



## MEMORANDUM

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To: Vice Chancellors and Director of Athletics  
Cc: Academic and Administrative Department Managers

Allen C. Meadors, Ph.D., FACHE *Acm*  
Chancellor

December 11, 2007

Re: Limiting and documenting collection of Social Security numbers

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As you know, inappropriate disclosure of Social Security numbers can create serious risk of harm to the affected individuals and potential liabilities for the University. North Carolina law strictly limits the situations in which UNC Pembroke may collect, store and transmit Social Security numbers. The institution has a statutory obligation, on an annual basis, to evaluate its use of Social Security numbers and other confidential personal identifying information and to report to the General Assembly about the results of that evaluation. With the goal of fulfilling those requirements and avoiding inappropriate and illegal handling of Social Security numbers, I direct department managers/chairs to implement and oversee the following actions in their departments effectively immediately:

Stop collecting Social Security numbers from any individual (student, faculty or staff) **unless** collection is either (1) authorized by state or federal law or (2) imperative for the performance of the department's duties and responsibilities. The collection of Social Security numbers must be **essential for business operations**. Collecting Social Security numbers for convenience or ease of administration is not permissible.

If the department manager thinks that collection of Social Security numbers is essential for business operations, s/he must first determine whether the collection of a redacted Social Security number (using only the last four digits of the Social Security number) is sufficient for departmental business. If any person's identifying number (other than the Banner ID number) is necessary, collection of redacted Social Security numbers is encouraged wherever possible.

Department managers who collect Social Security numbers must ensure that the numbers are not inadvertently disclosed or communicated to other University employees or departments that do not need these numbers for their business operations.

If a department receives a document from another university department, and the document contains a Social Security number that is not essential to the operations of the receiving department, the receiving department must redact the Social Security number.

- Department managers who fail to comply with this directive may be subject to appropriate disciplinary action.

As part of the University's efforts to reduce unnecessary collection of Social Security numbers and, as required by State law, each department must document every situation in which collection of a Social Security number is essential for business operations. Every department that determines collection of the entire Social Security number is essential, must complete following **no later than February 18, 2008**:

If the department manager determines that there are situations in which the department must collect the entire Social Security number, then s/he must prepare a written memorandum to the appropriate division Vice Chancellor or Chancellor stating the need for and purpose of collecting and maintaining the Social Security number as well as the steps that the department will follow to secure these numbers. A form that can be used for stating this information will be sent to you and will be posted on the UCIS website. The collection of Social Security numbers must be approved in writing by the Vice Chancellor or Chancellor as the responsible data steward under UNCP's *Electronic Information Management and Security Policy*. A copy of the department manager's memorandum, along with the Vice Chancellor's or Chancellor's written approval, must be provided to UNCP's Chief Information Officer (CIO) by the stated deadline. Questions about this process can be directed to the CIO or University Counsel.

In summary, it is essential that department managers/chairs complete the following:

- (1) Determine whether collection of Social Security numbers is essential for departmental operations;
- (2) If collection is deemed essential for business operations, document the reasons supporting the determination and obtain the Vice Chancellor's approval in writing; and
- (3) If collection of Social Security numbers is not deemed essential for business operations, cease collection of those numbers.

I thank you all in advance for your cooperation and efforts to ensure the security of the confidential student and employee information with which we are entrusted.