

BRANCH COUNTY

Social Security Numbers Policy and Procedure

Effective March 1, 2006

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COUNTY OF BRANCH

SOCIAL SECURITY NUMBERS POLICY AND PROCEDURE

PURPOSE

Branch County is required by Michigan's Social Security Number Privacy Act (Act 454 of 2004) to control how it obtains, uses, disseminates and disposes of records which contain Social Security numbers. The Act also requires Branch County to establish, publish and enforce a policy regarding the use, disclosure and disposal of records which it creates or obtains in the course of its business and which contain Social Security numbers. This Policy and Procedure sets forth Branch County's standards and practices for how much information is gathered, stored, disclosed and ultimately disposed of.

POLICY

It is the policy of Branch County that Social Security numbers obtained from employees, vendors, contractors, customers or others are confidential information. Social Security numbers will be obtained, retained, used and disposed of only for legitimate business reasons and in accordance with the law and this Policy and Procedure. A copy of Act 454 of 2004 is attached for reference.

PROCEDURE

A. Obtaining Social Security numbers

Documents or other records containing Social Security numbers are to be requested, obtained or created only for legitimate business reasons consistent with this policy. Such reasons include, but are not limited to:

1. Applicants may be required to provide a Social Security number for purposes of a pre-employment background check.
2. Copies of Social Security cards may be obtained for purposes of verifying employee eligibility for employment in accordance with the Immigration Reform and Control Act.
3. Social Security numbers may be requested from employees for tax reporting purposes (i.e. IRS Form W-4), for new-hire reporting, or for purposes of enrollment in Branch County employee benefit plans.
4. Social Security numbers may be obtained from contractors or vendors for tax-reporting purposes (i.e. IRS Form 1099).

5. Customers/clients may be asked to provide Social Security numbers for tax reporting purposes or for purposes of establishing a customer-specific account or other record.

B. Retention and Access to Social Security numbers

1. All records containing Social Security numbers (whether partial or complete) will be maintained in secured files.
2. All paper records containing Social Security numbers must be stamped “Confidential,” “Controlled Document,” or with some similar identifying mark.
3. Only personnel who have a legitimate business reason to know will have access to records containing Social Security numbers.
 - a. Employees whose job entails regular access to records containing Social Security numbers will be trained in the legal requirements and the requirements of this Policy and Procedure.
 - b. Where a record containing a Social Security number is to be disseminated to persons outside of Branch County, to persons with the County who are not authorized or trained in this Policy and Procedure, or where the Social Security number is not relevant to the purpose for which the record is being shared, the Social Security number shall be redacted or otherwise rendered unreadable.
4. Employees using records containing Social Security numbers will take appropriate steps to secure such records when not in immediate use. Such steps may include:
 - a. Placing such records in a locked desk or file drawer when not in use.
 - b. Using password protection or screen-savers on computers and computerized records to prevent unauthorized access to or viewing of such records by others.
5. Inactive records containing Social Security numbers will be retained in accordance with the requirements of state and federal laws and then destroyed in a manner that continues to ensure their confidentiality. For purposes of this Policy and Procedure, “inactive records” are those where there is no longer a current employer, supplier, or customer relationship.

C. Unauthorized Use/Disclosure of Social Security numbers

Any employee who obtains, uses or discloses Social Security numbers for unauthorized purposes or contrary to the requirements of this Policy and Procedure shall be subject to discipline up to and including discharge. Branch County will cooperate with appropriate law enforcement or administrative agencies in the apprehension and prosecution of any person who obtains, uses, or discloses Social Security numbers for unlawful reasons.