

SSN Exemption Request

Exemption Request for the Use of Social Security Numbers (SSNs)

SSNs and other personal identity information are confidential data and the theft and/or unintentional compromise of such data has become a major issue in higher education. The Chancellor has charged UNK to eliminate all non-essential use of SSN by January 1, 2008. Exceptions must have the Chancellor's approval.

INSTRUCTIONS:

1. Complete the form online with the exception of the Department Head signature box.
2. Print the form using the print function in your browser and then click the Finish button.
3. Department Head signs the form and forwards to:

Deb Schroeder

Assistant Vice Chancellor for Information Technology Services

114 Otto Olsen

University of Nebraska Kearney

Kearney, NE 68849

Information Technology Services will review the form and forward it to the Chancellor for approval.

Purpose and Audience:

The University of Nebraska Kearney recognizes the increased concern about individual privacy and the risk of identity theft. The Social Security Number (SSN) is classified as private data. The protection and confidentiality of the SSN is covered under Regents policy, federal law, and state law. Historically, the SSN has been employed to help identify and match records. However, current directives discourage this practice and make use of the SSN subject to approval. This procedure is intended to specifically address issues related to the use of the SSN in

university systems, including self-service applications and departmentally administered systems. Our objectives are to:

1. Eliminate the collection of the SSN except where required by law.
2. Eliminate the use of SSN in data systems, including display pages and reports.
3. Require the use of an exemption request when using or storing the SSN.
4. Increase awareness about the concern for privacy and the risk of identity theft related to the disclosure of the SSN.

The University is required to collect the SSN for a variety of legally mandated activities (e.g., income tax reporting, federally supported financial aid). All such cases, including existing systems, must be documented, reviewed, and approved by the Assistant Vice Chancellor of Information Technology or designee.

One Request Per Application

An exemption request must be made for each application that you own, run, and/or utilize if that application uses SSNs. The application may be specific to the function of your office. It may be a "shadow system" with an associated data base and/or data files. It may be a test version of an application. Or it may be a Word document or Excel Spreadsheet. (State law prohibits the use of employee SSNs to identify employees except for those uses required for tax and benefit purposes.)

New Applications Require New Requests

An exemption request must be made for any new application that will utilize SSN. The exemption request should be submitted before the purchase of the application. A test version of an application will require its own exemption request.

Automatic Exemptions

Employees with accounts for accessing SAP/HR and SIS do not need to request exemptions for SAP/HR or SIS access. If you extract SSNs from SAP/HR and/or SIS and store those SSNs on electronic devices, such as your desktop, network storage, flash drive, or other mobile device, you must submit an exemption request.

Annual Renewal

Exemptions are granted for one year and will be reviewed annually. Exemptions must be submitted annually.

1. Department and physical campus address of the application:
2. Contact Person and Phone number:
3. Describe the application requiring SSNs.
4. List computing devices and systems your application uses. Describe where and how SSNs are transmitted, processed and/or stored. For example, what model of workstation or server running which operating system does the application run on? What software or database is used in the application? Are the SSNs encrypted at rest and in transit? If so, name the encryption technology or product. How are the SSNs transmitted to the application i.e. FTP, SFTP, email attachment, etc.?

5. Estimate the number of SSNs in this application. Describe the cohort. E.G. "3267 SSNs of 2007 graduating high school students in Nebraska who have expressed interest in admission to a program in our department."

6. Explain why NUID or some other identifier can not be used for this application.

7. Department Head Name

8. Department Head Signature

9. Date Signed

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Exemption Approved

Exemption Denied

Chancellor's Office Signature

Date Signed
