

# **MACOMB COUNTY HUMAN RESOURCES POLICY**

## **SOCIAL SECURITY NUMBER DISCLOSURE**

With respect to the social security number of an employee or other individual, Macomb County will not do any of the following:

Publicly display more than 4 sequential digits of the social security number.

Use more than 4 sequential digits of the social security number as the primary account number for an individual.

Visibly print more than 4 sequential digits of the social security number on any identification badge or card, membership card, permit or license.

Require an individual to use or transmit more than 4 sequential digits of their social security number to gain access to an internet website or a computer system or network unless the connection is secure, the transmission is encrypted or a password or other unique personal identification number or other authentication device is also required to gain access to the internet website or computer system or network.

Include more than 4 sequential digits of the social security number in or on any document or information mailed or otherwise sent to an individual if it is visible from outside of the envelope/packaging with or without manipulation.

Include more than 4 sequential digits of the social security number in any document or information mailed to a person, unless one of the following apply:

State or federal law, rule regulation, or court order authorizes, permits or requires that a social security number appear in the document.

The document is sent as part of an application or enrollment process initiated by the individual.

The document is sent to establish, confirm the status of, service, amend, or terminate an account, contract, policy, employee, health insurance benefit or to confirm the accuracy of a social security number of an individual who has an account, contract, policy or health insurance benefit.

The document or information is mailed by the County under any of the following circumstances:

The document or information is a public record and is mailed in compliance with the freedom of information act, 1976 PA 442, MCL 15.231 to 15.246.

The document or information is a copy of a public record filed or recorded with the County Clerk or Register of Deeds office and is mailed by that office to a person entitled to receive that record.

The document or information is a copy of a vital record recorded as provided by law and is mailed to a person entitled to receive that record.

The document or information is mailed by or at the request of an individual whose social security number appears in the document or information or at the request of their parent or legal guardian.

**EXCEPTIONS TO PROHIBITED SOCIAL SECURITY NUMBER DISCLOSURE:**

The above prohibitions to the disclosure of all or more than 4 sequential digits of a social security number do not apply to any of the following:

A use of more than 4 sequential digits of a social security number that is authorized or required by state or federal statute, rule, or regulation, by court order or pursuant to legal discovery or process.

A use of more than 4 sequential digits of a social security number by a law enforcement agency, court, or prosecutor as part of a criminal investigation or prosecution, or providing more than 4 sequential digits of a social security number to a law enforcement agency, court or prosecutor as part of a criminal investigation or prosecution.

This Policy does permit the use of more than 4 sequential digits of the social security number as the primary account number for an individual; or including all or more than 4 sequential digits of a social security number in any document or information mailed to a person, if the use is in accordance with any of the following:

An administrative use of more than 4 sequential digits of the social security number in the ordinary course of business, by a person, vendor or contractor of a person, to do any of the following:

Verify an individual's identity, identify an individual, or do another similar administrative purpose related to an account, transaction, product, service or employment or proposed account, transaction, product, service or employment.

Investigate an individual's claim, credit, criminal or driving history.

Detect, prevent or deter identity theft or another crime.

Lawfully pursue or enforce a person's legal rights, including, but not limited to, an audit, collection, investigation or transfer of a tax, employee benefit, debt, claim, receivable, or account or an interest in a receivable or account.

Lawfully investigate, collect, or enforce a child or spousal support obligation or tax liability.

Provide or administer employee health insurance or membership benefits, claims, retirement programs or to administer the ownership of shares of stock or other investments.

A use of more than 4 sequential digits of a social security number as a primary account number that meets both of the following:

The use began before March 1, 2005.

The use is ongoing, continuous and in the ordinary course of business. If the use is stopped for any reason, this subsection no longer applies.

### **CONTROL OF ACCESS TO SOCIAL SECURITY NUMBERS:**

Access to records containing social security numbers is limited to employees who need to see those records for the performance of their duties.


Employees' access to records containing social security numbers may be determined through the use of electronic audit trails.

During storage, electronic records containing social security numbers shall encrypt the social security numbers. Records in other media that contain social security numbers shall be stored in locked cabinets or otherwise secured against unauthorized access.

**DISPOSAL OF DOCUMENTS THAT CONTAIN SOCIAL SECURITY NUMBERS:**

Discarding or destroying records in any medium containing social security numbers must be done so in a way that protects the confidentiality of social security numbers. It shall be accomplished by shredding, erasing, or otherwise modifying that portion of the record containing a social security number to make it unreadable or undecipherable, before the record is discarded.

Approved:

  
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Office of County Executive

7-1-22

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Date

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