

 <p>RHODE ISLAND COLLEGE</p> <p>OFFICIAL POLICY</p>	<p><i>Bio-Demographic Data Collection and Use</i></p>	<p>EFFECTIVE DATE: 2014/03/26</p> <p>REVISION HISTORY: Originally established 2007/02/13</p>
<p>RESPONSIBLE OFFICE: Information Services</p>	<p>POLICY OWNER: Assistant VP for Information Services</p>	<p>SUPERSEDES: 2007 version, policy with same title</p>

PART 1. RATIONALE

Rhode Island College recognizes the concern for individual privacy and the risk of identity theft. Of particular concern are Social Security numbers and dates of birth. Social Security numbers are classified as private data; their confidentiality is covered under federal and state law. While Social Security numbers have been replaced by a unique “person” identifier, or key, (termed the EMPLID, for “Employee Identification Number”) in the college’s administrative systems, this policy is intended to address specific issues related to the use of Social Security numbers, date of birth, and other bio-demographic data in college systems, including self-service applications and departmentally administered systems.

PART 2. SCOPE

This policy applies to all college systems.

PART 3. DEFINITIONS

<p>IRS Form 1098-T</p>	<p>Form 1098-T provides a taxpayer with information on tuition and fees paid in a given tax year. Certain taxpayers may use this information as a deduction on federal income tax returns.</p>
<p>Need to know</p>	<p>Information that, without which, the employee cannot fulfill her or his job responsibilities.</p>

PART 4. STATEMENT OF POLICY

Bio-Demographic Data Collection and Use

- A. Social Security Numbers
 - 1. The college is required to obtain Social Security numbers from all students and employees in order to comply with Internal Revenue Service regulations, federal student financial aid processing, Office of Institutional Research and Planning analyses, and a limited number of other business transactions. While Social Security numbers will be collected and retained as authorized by law, they will not be used for routine identification or authentication purposes.
 - 2. The college will not collect or use the Social Security numbers of individuals except where required by law.
 - 3. Social Security numbers will only be used for the purpose for which they were collected.

4. The college will use a unique information system-generated identifier, the EMPLID, for routine identification and authentication purposes (e.g., college ID cards).
5. Social Security numbers will not be used as the primary key in college databases.
6. Access to Social Security numbers will be restricted to those with a need to know.
7. Social Security numbers must be stored in a secure manner. Social Security numbers shall not be stored on portable devices that are not encrypted or on devices attached to the college's network that are not secured by proper authentication. Encryption will be required for transmitting Social Security number data.

B. Other Personally Identifiable Information

1. The college is required to obtain the following information from all students and employees in order to comply with Internal Revenue Service regulations, federal student financial aid processing, state-mandated system-wide data collection, Office of Institutional Research and Planning analyses, and a limited number of other business transactions:
 - a. name
 - b. date of birth
 - c. home address
 - d. mailing address
 - e. sex
 - f. previous degrees
 - g. state of residence
2. These data will not be used for routine identification or authentication purposes.
3. The college will not use these data except where required by law or business necessity.
4. Access to these data elements will be restricted to those with a need to know.
5. These data will be stored in a secure manner.

PART 5. PROCEDURES

Procedures for Collection of Bio-Demographic Data

- A. All business offices that are responsible for creating "new records" in the PeopleSoft system shall request students, faculty, and staff to provide the following information:
 1. full name
 2. date of birth
 3. social security number

4. home address
 5. mailing address
 6. sex
 7. previous degrees
 8. state of residency (required for students and classified employees only)
- B. Faculty and staff must provide the information as a condition of working at the college. Students may not be denied the right to enroll if they refuse to provide their Social Security numbers, but if they do not provide their Social Security number, they must be advised that:
1. they are not eligible to work at the college
 2. no IRS form 1098-T, which may enable them or a family member to obtain a tax deduction, will be filed for them
 3. their academic record may not be accepted by the [National Student Clearinghouse](#)
- C. For students who do not provide a Social Security number, an identification number using a 99+EMPLID format will be created. Students who have been previously enrolled at the college and do not provide their Social Security number must provide their EMPLID number to re-enroll.
- D. All business offices that are responsible for creating “new records” shall request the following additional information:
1. home and/or mobile phone number
 2. birth name
 3. race
 4. personal email address
- E. Provision of information listed in Section 5.D. is strictly voluntary.

PART 6. GUIDELINES

N/A

PART 7. RESPONSIBILITIES

Responsible Official	List of Responsibilities
All college personnel who collect, use, and/or have access to bio-demographic data for students or employees	Strict adherence to this policy

PART 8. CONTACTS

Subject	Office or Position	Telephone Number	E-Mail
Policy Clarification	Assistant Vice President for Information Services	(401) 456-8200	avpis@ric.edu

PART 9. POLICY ENFORCEMENT

Violation(s)	Any breach of Part 4 of this policy.
Potential consequences	Potential consequences include but are not limited to: under FERPA, penalties for uncorrected violations may lead to a cutoff of federal funding. The state Privacy Act allows for plaintiffs to sue for damages. Under the college's Responsible Computing policy, those responsible for a policy violation may be subject to curtailment of computing privileges and may also be subject to disciplinary action.
Where to report violations	Assistant Vice President for Information Services, (401) 456-8200, avpis@ric.edu

PART 10. FORMS/TEMPLATES/REFERENCE DOCUMENTS

Form, Template, or Document <i>(use hypertext if available)</i>
Family Educational Rights and Privacy Act of 1974 (FERPA)
Gramm-Leach-Bliley Act , 15 USC, Subchapter I, Sec. 6801-6809, Disclosure of Nonpublic Personal Information
College Records policy
Responsible Computing policy
Rhode Island Access to Public Records Act [R.I.G.L. 38.2]
Rhode Island Privacy Act [R.I.G.L. 9-1-28.1]