

PERSONAL INFORMATION PRIVACY POLICY

I. Policy Section

11.0 Business Functions

II. Policy Subsection

11.2 Personal Information Privacy

III. Date of most recent changes

August 10, 2005

IV. Policy Statement

Grand Rapids Community College needs to use Social Security Numbers (SSN) and other confidential information in the normal course of business. We ensure, to the extent practicable, the confidentiality of this information including SSN. Individuals and departments that use SSN and other confidential information in the normal course of business will operate in strict confidence and follow the procedures set forth here within.

V. Reason for Policy

This policy is enacted to ensure compliance with the Michigan Social Security Act, the Federal Family Educational Rights and Privacy Act (FERPA), and Health Insurance Portability and Accessibility Act (HIPAA).

VI. Entities Affected by This Policy

Financial Institutions and offices, College Registrar Offices, Third Party Benefit Administrators and Insurance Companies, Government Entities such as Payroll, Wage, and Financial Aid.

VII. Who Should Read This Policy

All Staff that comes in contact with SSN and personal confidential information.

VIII. Related Documents

Michigan Social Security Act

Federal Family Educational Rights and Privacy Act (FERPA)

Health Insurance Portability and Accessibility Act (HIPAA) and related documents

Family Medical Leave Act (FMLA) and related documents

Americans with Disabilities Act (ADA) and related documents

Bullard-Plawecki – The Employee Right to Know Act

GRCC Policy – 14.3 Complaints Regarding Violations of Privacy and Confidentiality (HIPAA)

GRCC Policy – 14.4 Sanctions for Violations of Confidentiality: Refraining From Intimidating or Retaliatory Acts (HIPAA)
Freedom of Information Act (FOIA).
GRCC Policy (old format) – 3.4 Public Access to Records
GRCC Policy (old format) – 6.13 Board Access/Employee Personnel Records
GRCC Policy (old format) – 8.6 Privacy and Access to Student Records
GRCC College Catalog – Academic Policies
GRCC Acceptable Use Agreement (AUA)
Health Information Form
All recruiting/hiring resumes, applications, forms, etc.
Enrollment forms for medical, life, and other benefits
Non-Disclosure of Information Agreement
Confidentiality Agreement

IX. Contacts

Registrar
Director of Human Resources
Director of Payroll & Benefits
Executive Director of Financial Services
Executive Director of Student Financial Services
Director of Technology

X. Definitions

Confidential Information (CI): Social Security Number, birth date that includes year born, student records, personal financial information including credit card numbers, and all medical/health information.

GRCC: Grand Rapids Community College

XI. Procedures

Access to information in the possession of, or under the control of, GRCC must be provided based on the need to know, subject to state and federal privacy laws. Information must be disclosed only to people who have a legitimate business need for the information. Grand Rapids Community College will follow the following procedures in regards to Confidential Information (CI):

Access to CI

- Restrict access to CI to only those people that need to know and use SSN in normal business operations.
- All requests for any information about GRCC and its business must be referred to the contacts listed above, Communications Department, Campus Police, or the Registrar's Office as appropriate. Such requests include FOIA requests, subpoenas, questionnaires, surveys, and newspaper interviews.
- Any third party organization may be required to sign the GRCC Non-Disclosure of Information Agreement

Use of CI

- CI will only be used in the normal course of business. Unlawful disclosure of CI is strictly prohibited.
- CI will not be printed on any identification badge, card, or permit.
- CI will not be publicly posted or displayed.
- CI can only be electronically transmitted via the internet through encrypted mechanisms.
- Whenever practical, only the last four sequential numbers will be used in the Social security number
- Whenever practical, only the month and day of the birth date will be used
- Any discarded document that contains a CI must be shredded.
- Access to areas containing CI must be physically restricted to those people with a need to know. When not in use, CI must always be protected from unauthorized disclosure and should be stored in locked storage files.
- GRCC will send no mail to any individual containing the full SSN unless authorized by law. Exceptions to this are:
 - State or federal law, rule, regulation, or court order or rule authorizes, permits, or requires that a SSN 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, or employee or health insurance benefit or to confirm the accuracy of a SSN of an individual who has an account, contract, policy, or employee or health insurance benefit.
 - The document or information is a public record and is mailed in compliance with the FOIA.
 - 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 SSN appears in the document or information or his or her parent or legal guardian.
 - The document or information is mailed in a manner or for a purpose consistent with HIPAA.
- Any mail that contains documents with CI will not be visible on or, without manipulation, from outside the envelope or packaging.
- Use of student records will adhere to the restrictions of FERPA.
- Use of medical records will adhere to the restrictions of HIPAA.
- Students and Employees of GRCC may give permission to release CI. Permission must be in writing with signature.
- Personal telephone numbers or email addresses may be distributed in order to facilitate work schedules or business operations.

XII. Enforcement of Policy

All department leaders (vice president, director, etc.) will be responsible for the compliance of this policy within their department and staff.

Any individual that violates this policy may result in disciplinary action, up to and including, discharge of employment. Additionally, violators of this policy may also be subject to civil or criminal sanctions as provided for by law.

XIII. Forms

All human resources, payroll/benefits, student record forms that contain CI.
Release of Information Form
Non-Disclosure of Information Agreement
Confidentiality Agreement