



**THE GEORGE  
WASHINGTON  
UNIVERSITY**  
WASHINGTON, DC

**Responsible University Official:**

Chief Information Officer

**Responsible Office:** Division of  
Information Technology

**Last Revised Date:** July 24, 2008

## **SOCIAL SECURITY NUMBER AND Gwid USAGE**

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### **Policy Statement**

All university departments and units must use the George Washington Identification Number (Gwid) as the primary Identifier for all university purposes except when use of the Social Security Number (SSN) is required. When use of the SSN is required, departments and units are responsible for instituting practices and procedures to protect the confidentiality of SSN data, whether on paper or in electronic format.

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### **Reason for Policy**

The purposes of this policy are to promote use of the Gwid where the SSN is not required; to provide consistent and clear guidelines for use of SSN data where required; and to eliminate unnecessary storage and use of SSNs in university documentation, practices and systems. All of these objectives are designed to protect the confidentiality and prevent the unauthorized or accidental disclosure of SSNs.

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### **Who is Governed by this Policy**

Faculty, staff, students, alumni and contractors

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## Policy

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The SSN is regulated data and must be handled and secured in a manner consistent with the [Information Security Policy](#). Please refer to the Information Security Policy for the specific policy requirements for the storage, handling, and transmission of SSNs and other regulated data.

At the time a new person record is created in a university Enterprise System, a unique GWid is created automatically. After establishment of the GWid, that number must be used as the primary Identifier for that person for all university systems, reports and processes, except when use of SSNs is required by law or other external requirement, or is deemed essential for internal purposes. See Appendix A for examples of appropriate, currently approved uses for SSNs.

Departments and individuals requesting identifying information from individuals, generating reports, extracting information from Enterprise Systems, or otherwise using personally identifying information must examine their forms, processes and practices to determine whether the use of SSNs is essential or whether use of the GWid and/or some other form or combination of identifying information will suffice. If a school or division believes that it should obtain or use SSNs for a purpose not listed in Appendix A, a request for such use must be reviewed and approved by a Vice Provost, Associate Vice President or equivalent or higher supervisor responsible for such school or division.

Schools or divisions authorized to collect SSNs must do so in accordance with the Information Security Policy. In addition, other reasonable measures must be taken, including: Requesting reports with only those data fields that are necessary to perform the job function; storing paper and electronic records appropriately and securely, retaining only appropriate and necessary evidence of the collection of that data (e.g. forms signed by the individuals); storing electronic records only in enterprise systems secured by the Division of Information Technology (IT) and in accordance with applicable government regulations; and destroying and deleting

unneded documents or data in accordance with the university's [Records Management Policy](#).

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## Definitions

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**ENTERPRISE SYSTEM** A computing system maintained by the Division of Information Technology that is used by more than one school or division and that contains financial, managerial, confidential or other sensitive or mission critical information. Examples of Enterprise Systems include *Banner*, the *Kronos* time reporting system, and *Oracle*.

**IDENTIFIER** A unique attribute assigned to facilitate and track within the university's departments and information systems information about a student, a faculty or staff member, or other person or entity associated with the university.

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## Related Information

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[George Washington University Privacy Policy Statement](#)  
[Information Security Policy](#)  
[Privacy of Student Records Policy](#)  
[Records Management Policy](#)

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## Contacts

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Contact	Telephone	Email
Compliance Office	(202) 994-3386	<a href="mailto:comply@gwu.edu">comply@gwu.edu</a>
IT Support Center	(202) 994-4948	<a href="mailto:ithelp@gwu.edu">ithelp@gwu.edu</a>

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## Document History

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- **Last Reviewed Date:** April 4, 2017
- **Last Revised Date:** July 24, 2008

- **Policy Origination Date:** March 31, 2005

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## **Who Approved This Policy**

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Louis H. Katz, Executive Vice President and Treasurer

Beth Nolan, Senior Vice President and General Counsel

*This policy, as well as all [university policies](#), are located on the [Office of Compliance and Privacy Office's](#) home page.*

# **Appendix A: Examples of Appropriate Purpose for Use of SSNs**

## **Examples of Appropriate Purposes for Use of SSNs**

**Tax Reporting** – An SSN is required as a taxpayer ID for all tax information reported to the Internal Revenue Service, including wage and withholding data for full-time and part-time faculty and students (W-2's), for honoraria provided to guest lecturers, and for individuals working for the university as independent contractors (1099's). In addition, an SSN is required as a taxpayer ID when reporting annual tuition received from students to the Internal Revenue Service (1098T's).

**Financial Aid** – An SSN is necessary to obtain financial information and to identify and confirm the level of financial aid assistance.

**Human Resources** - The Immigration Reform and Control Act of 1986 (IRCA) requires the use of an SSN for I-9 forms. Certain benefit providers, such as health insurance companies, also may require an SSN for verification of eligibility and coordination of benefits.

**Law Enforcement** – Federal and state agencies often rely upon SSNs as the primary identifier for law enforcement, and for civil and criminal information purposes. In the event such agencies request SSN information using proper procedures, and the university has such information, it will be provided following review and approval by the Office of the Senior Vice President and General Counsel.