SOCIAL SECURITY NUMBER
AND GWid USAGE POLICY

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 security of SSN data, whether in paper or electronic format.

Reason for Policy/Purpose

The purposes of this policy are to prevent unauthorized and unnecessary disclosure of SSNs; 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.

Who Needs To Know This Policy

Faculty, staff, students, alumni and contractors

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Policy/Procedures

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 a verifiable, secure manner, and must take reasonable measures to protect SSNs once collected. These reasonable measures include: 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 unneeded documents or data in accordance with the university’s Records Management Policy.

Website Address for This Policy

GW University Policies

Contacts

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<tr>
<th>Subject</th>
<th>Contact</th>
<th>Phone</th>
<th>e-mail</th>
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<tr>
<td>Use of SSNs and GWids</td>
<td>Compliance &amp; Privacy Office</td>
<td>(202) 994-3386</td>
<td><a href="mailto:comply@gwu.edu">comply@gwu.edu</a></td>
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Reporting Security Incidents

Information Security and Compliance Services, Division of IT
(703) 726-4262 abuse@gwu.edu

Security Questions

Information Security and Compliance Services, Division of IT
(703) 726-4262 infosec@gwu.edu

IT Support Center
(202) 994-4948 ithelp@gwu.edu

Appendices

Appendix A  Examples of Appropriate Purposes for Use of SSNs

Definitions

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.

Related Information

George Washington University Privacy Policy Statement
Information Security Policy
Privacy of Student Records Policy
Records Management Policy
GWid Best Practices: http://gwid.gwu.edu/BestPractices/
SOCIAL SECURITY NUMBER AND GWid USAGE POLICY

Who Approved This Policy

Louis H. Katz, Executive Vice President and Treasurer  
Steven Lerman, Provost and Executive Vice President for Academic Affairs  
Beth Nolan, Senior Vice President and General Counsel

History/Revision Dates

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Appendix A

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.