



THE GEORGE
WASHINGTON
UNIVERSITY
WASHINGTON DC

Responsible University Official:
Assistant Vice President for University
Compliance & Privacy
Responsible Office: Compliance &
Privacy Office
Origination Date: March 31, 2005

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 University is committed to assisting members of its community in maintaining their privacy and to reducing the visibility and use of SSNs in University systems and practices. 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 in Banner. 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 use of SSNs is really essential, or whether use of the Gwid and/or some other form or combination of identifying information will suffice. If a department or unit 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 an Associate Vice President or equivalent or higher supervisor responsible for that department or unit.

Departments or units 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 Information Systems and Services 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

Subject	Contact	Phone	e-mail
Use of SSNs and Gwids	Compliance & Privacy Office	(202) 994-3386	comply@gwu.edu

SOCIAL SECURITY NUMBER AND Gwid USAGE POLICY

Reporting Security Incidents	Information Security Office, ISS	(202) 994-7803	abuse@gwu.edu
Security Questions	Information Security Office, ISS http://infosec.gwu.edu	(202) 994-7803	infosec@gwu.edu
Help Desk Website	http://helpdesk.gwu.edu		

Definitions

Enterprise System A computing system maintained by Information Systems and Services that is used by more than one department, 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

[Data Classification Security Policy](#)

[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/>

Family Educational Rights and Privacy Act of 1974 (FERPA)

Health Insurance Information Portability and Accountability Act (HIPAA)

The Immigration and Control Act of 1986 (IRCA)

Social Security Act of 1935

Who Approved This Policy

Robert A. Chernak, Senior Vice President Student and Academic Support Services

Louis H. Katz, Executive Vice President and Treasurer

Donald R. Lehman, Executive Vice President for Academic Affairs

Beth Nolan, Senior Vice President and General Counsel

John F. Williams, Provost and Vice President for Health Affairs

History/Revision Dates

Origination Date: March 31, 2005

Last Amended Date: July 24, 2008

Next Review Date: July 31, 2010

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, for honoraria provided to guest lecturers, and for individuals working for the University as independent contractors.

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 Vice President and General Counsel.