

POLICY NO. 90

**BOARD OF COUNTY ROAD COMMISSIONERS
OF THE COUNTY OF ST. CLAIR**

SUBJECT: SOCIAL SECURITY NUMBER PRIVACY POLICY

ADOPTED: November 1, 2005

In the ordinary course of business, the St. Clair County Road Commission obtains the Social Security Numbers (SSNs) of applicants and employees for identification and tax-related purposes. To the extent practicable, the Road Commission shall maintain the confidentiality of applicants' and employees' SSNs. SSNs will be used by the Road Commission as follows:

1. The Road Commission will use SSNs in the process of producing payroll, including any state or federal filing requirements, and, if required, for establishing, confirming the status of, servicing, amending, or terminating an account, contract, policy, or employee benefit, or to confirm the Social Security number of an individual who has an account, contract, policy, or employee benefit.
2. The Road Commission may use an employee's SSN to perform background checks or to investigate an individual's claim, credit, criminal, or driving history.
3. The Road Commission may use an employee's SSN to detect, prevent, or deter identity theft or other crime.
4. The Road Commission may use an employee's SSN for any other administrative purpose related to employment.

Information or documents that contain SSNs shall be stored in a physically secure manner. Access to information or documents that contain applicants' and employee's SSNs shall be limited to: Managing Director, Director of Internal Services, Human Resources Ad-Tech, Accounting Supervisor, and Payroll Clerk.

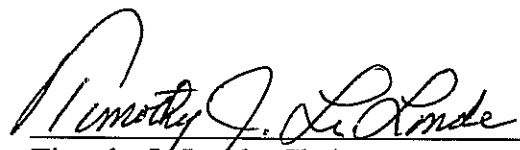
All unlawful disclosure of applicants' and /or employees' SSNs is prohibited. No employee of the Road Commission shall unlawfully acquire, disclose, transfer, or use the SSN of an applicant or another employee. The Road Commission will not publicly display more than four (4) sequential digits of any SSN unless required in the course of processing state and federal reports for purposes of wage reporting. SSNs shall not be placed on identification cards, badges, time cards, employee rosters, bulletin boards, or any other materials or documents designed for public display.

Road Commission documents containing an individual's SSN shall only be mailed to a person when state or federal law, rule, regulation, or court or rule authorizes, permits or requires that a SSN appear in the document or where the document is mailed at the request of the individual. Documents containing SSNs that are sent through the mail shall not reveal the number through the envelope window, nor shall the number otherwise be visible from outside the envelope or package.


SSNs shall not be sent through e-mail unless the connection is secure or the number is encrypted. No individual shall be required to send his/her SSN through e-mail unless the connection is secure or the number is encrypted. SSNs shall not be store on computers or other electronic devices that are not secured against unauthorized access.

Where a SSN is contained within a document subject to FOIA release, the SSN shall be redacted. Documents or other materials containing SSNs shall not be thrown away in the trash. They shall be discarded or destroyed only in a manner that protects their confidentiality, such as shredding.

Complaints concerning possible violation of this policy should be directed to the Managing Director. If the complaint is about the Managing Director, it should be directed to the Chair of the Road Commission Board. The recipient of the complaint and/or an appropriate designee will conduct an investigation. Any employee who is found to have violated this policy shall be subject to disciplinary action, up to and including discharge.



Timothy LaLonde, Chairman



Donald M. Maronde, Managing Director