



## Secure Handling of Social Security Numbers Policy

### Approved Uses of SSNs - Appendix B

The primary uses and reasons for collecting a SSN include the following:

- **Enrollment:** Those wishing to enroll in academic offerings at Northwestern University - both credit and non-credit - are required to provide a SSN for secondary identification purposes. IRS regulations do require the University to request a SSN as a Taxpayer ID number for use in tax reporting. In addition, any student applying for Financial Aid or Student Loans must provide a SSN to the University.

If a person enrolling in a Northwestern University academic offering - credit or non-credit - refuses to provide a SSN, certain services, such as transcripts, enrollment verification, tax reporting, financial aid and other services may not be available to the individual, and Northwestern University cannot guarantee a complete academic record for the individual.

Historic hardcopy academic records may contain a student's SSN, as SSN was previously used as the student ID.

- **Employment:** A SSN must be provided on I-9's in accordance with the Immigration Reform and Control Act of 1986 (IRCA), as overseen by Human Resources Payroll Division .
- Any person employed by the University must provide a SSN as the taxpayer ID number as directed by the IRS. This includes all employees, including part-time and student employees. Providing the SSN is a condition of employment. Applicants for employment must also provide a SSN, if requested, for mandatory background checks.
- **Employee Benefits:** If required by a benefits provider, the SSNs of dependents/beneficiaries may be collected to receive service. Northwestern University may also release an employee's SSN to benefit providers.

- **Payment for Personal or Professional Services:** Any person providing services to the University as a independent contractor, invited speaker (honorarium) or research subject for which payment will be made, must provide a SSN as the taxpayer ID number per IRS regulations. These taxpayer ID numbers will be stored in the accounts payable system as part of the vendor record.
- **Planned Giving Donors:** Donors participating in planned giving programs must provide a SSN as the taxpayer ID per IRS regulations.
- **Insurance Providers:** The SSNs of faculty, staff and students continue to be the patient identifier for many health care providers. For example, to enable payment of medical bills, student SSNs are shared with Chickering, the insurance company providing health coverage.
- **Bursar's Office – American Express Corporate Card Program:** The SSN is required by the American Express Corporate Card system. NU verifies the cardholder's employment and provides the SSN to American Express for use in cross-referencing within NU's Human Resources system and the Bursar's Office database for purposes of account maintenance and reporting.
- **Office of Alumni Relations and Development (OARD):** The Office retains the student records of alumni. Currently, records with SSN data are retained within imaged records and within the BSR Advance system.
- **Student Health Services:** The department requires and uses SSN as a primary identifier within its systems, due in large part to the required interaction with insurance companies (e.g., Aetna's The Chickering Group) and health care and service providers (e.g., Evanston Northwestern Healthcare).
- **University Police:** Department personnel collect SSN data during an arrest as required by the Illinois State Police and Federal Bureau of Investigation (FBI). Additionally, UP maintains copies of fingerprint cards that contain SSN data, and the "arrest" module of the records database stores SSN data.