

MEMORANDUM

TO: Deans, Directors, Department Chairs

CC: HR Facilitators
Business Managers
Research Administration Support Group

FROM: Nancy Sutenfield, Vice Chancellor for Finance and Administration
Dan Reed, Vice Chancellor for Information Technology
Leslie Chambers Strohm, General Counsel

RE: Protections for Social Security Numbers and the
Adoption of the NC Identity Theft Protection Act

DATE: November 28, 2005

North Carolina has recently enacted a new law that implements the North Carolina Identity Theft Protection Act and that amends the Public Records Act. The Public Records Act amendment reinforces existing restrictions imposed by federal and state laws and UNC policy upon the collection and the use of social security numbers. The new law also requires state agencies, including the University, to submit an annual report to the General Assembly describing the agency's efforts to limit the collection and dissemination of social security numbers and other personal identifying information. The first report is due January 1, 2006.

In order to comply with the reporting requirement and to assist with our overall compliance efforts, we ask for your immediate assistance in providing the following information:

- An indication regarding whether your department issues ID cards or badges with social security number information embedded.
- A description of all forms or electronic templates that your department or unit distributes or maintains that request a person's social security number or any portion thereof.
- An indication of whether you distribute or maintain these forms or electronic templates on behalf of an outside vendor or third party and, if so, the identity of the outside vendors and/or third parties.
- A description of the purpose for collecting the social security number information and an indication as to whether individuals authorize the use of their social security number information for this purpose.
- An indication as to whether the disclosure of a person's social security number is mandatory or voluntary.
- An indication as to whether your department shares any of the social security numbers

you collect with outside vendors or third parties and, if so, the identity of these outside vendors and/or third parties and the purpose for sharing the social security number information.

- A description of the security measures that your department or unit has implemented to limit access to and disclosure of a person's social security number information (e.g., locked file cabinets, password-protected electronic files, encryption).

- A description of any plans you have to either require or discontinue the collection of a person's social security number (e.g., requesting a random personal identification (PID) number instead of a social security number).

By Friday, December 9, 2005, please forward this information to the Office of University Counsel via campus mail at CB #9105 or via email to legal@unc.edu. We recognize the effort that is involved in this inventorying process, and we have created a template document to assist you. The template is available online for downloading at <http://www.unc.edu/depts/legal/ssn>.

Please be advised that a Committee has been formed to review the information received by the Office of University Counsel and to issue recommendations regarding University-wide policy. As soon as the Committee has completed its work, additional compliance guidance will be provided. In the interim, if you have any questions about the current or future collection and use of social security numbers, please contact any of the following individuals:

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Thank you for your immediate cooperation and assistance. We expect this process to reinforce the University's continuing commitment to limit its collection and use of social security numbers.