



The Privacy Task Force was formed to conduct research into protecting personal information and privacy at St. Louis Community College. The Privacy Implementation Team was formed to review those recommendations and to implement procedures necessary to ensure protection of personal information of all district faculty, staff and students.

The CIAC IT Standing Committee congratulates the Privacy Implementation Team on the completion and success of this project. The members of this team are: Steve Brady, Denise Coyne, Cathye Dierberg, Mark Doering, Dave Goslik, Herb Gross, Christy L Jaeger, Susan Lore, Frank LoRusso, Joan McCready, Tina Odo, Lauren Roberds, Matt Roberts, Susan Roesch, Laura Sterman, Lee Vermeiren, and Lisa Winterer.

The specific recommendations addressed by this team are:

1. The College should continue to obtain the SSN or ITIN from all entering students as part of their permanent record. However, a SLCC alternate primary identifying number will be assigned and used for all purposes that do not require the SSN/ITIN. The SSN/ITIN will only be provided to those entities that require it for financial aid, tax and other administrative reporting. The alternative number will serve as the key to the student's electronic file.
 - a. All new, reentry and transfer students will be assigned an alternative primary identifying number.
 - b. All current students will receive a new primary identifier and will have to obtain a new student ID card.
 - c. All prior students will be assigned a new primary identifier.
2. The College should continue to require the SSN or ITIN from all employees at the time of employment. However, a SLCC alternate primary identifying number will be assigned and used for all purposes that do not require the SSN/ITIN. The SSN/ITIN will only be provided to those entities that require it for tax reporting, insurance providers, and retirement programs. The alternative number will serve as the key to the employee's electronic file.
 - a. All new employees will be assigned an alternative identifying number.
 - b. All current employees will receive a new primary identifier and will be required to obtain a new staff ID card.
 - c. All prior employees will be assigned a new primary identifier.
3. The College should continue to require the SSN from individuals who are entered as vendors in Banner. However, a SLCC alternative primary identifying number will be assigned and used for all purposes that do not require the SSN. The College needs to review the use of the EIN for business entities that are vendors in Banner.
4. The SSN field should be masked from view on Banner screens to everyone except select staff that need access to fulfill their job responsibilities.
5. The SSN field should be removed from hard copy College forms, except where specifically required, and be replaced with a field for the primary identifying number.
6. Materials printed from Banner, either individually or in a batch, should never include the SSN, except where specifically required.
7. The College should develop a formal policy for SSN use and publish such on its website and other appropriate College documents. Appropriate disclosure statements should be available for those instances when the College requests the SSN.
8. College administrative procedures should be amended to include appropriate methods for the handling and disposal of hard copy personally identifiable information.
9. Training on FERPA, HIPPA, and all other privacy acts should be developed and be required annually for all categories of employees. This should include an online component for current staff. Also, a brochure outlining appropriate College procedures should be developed and distributed to all employees for reference when handling personal information.
10. The SLCC Privacy Policy and Website Terms and Conditions provided by General Counsel should be available on the College's public website.
11. The College should not electronically transmit SSNs over the public internet by unencrypted email, non-secure web forms or any other unencrypted manner.
12. Reports that are published for general use from Hyperion (Brio), Banner or other College computer applications should not include SSNs except where specifically required.
13. The College should review, based on banking practices, the issue of electronic retention of credit card numbers.