

# CLINTONDALE COMMUNITY SCHOOLS

35100 Little Mack – Clinton Township, Michigan 48035 - 586-791-6300 – [www.clintondaleschools.net](http://www.clintondaleschools.net)

## BOARD POLICY

### *Series 3000: Operations, Finance, and Property*

#### **3100 General Operations**

##### **3113 Social Security Numbers**

The District's use, storage, and transmission of social security numbers will comply with this Policy and applicable law. As used in this Policy, "social security number" means more than 4 sequential digits of a person's social security number.

###### A. Social Security Number Confidentiality

1. District personnel may access another person's social security number only to the extent necessary to perform District job duties.
2. Any physical, non-digital document or physical copy of a digital document, containing a person's social security number, if practical, should be stored in a secure area when not in use.
3. Any application, software program, electronic document, or other digital means through which a person has access to a social security number must be password protected.
4. District personnel and Board members will not intentionally disclose a social security number or a document containing a social security number to another person unless (a) that person is authorized to receive social security numbers under subsection B of this Policy, or (b) the disclosure is necessary to comply with applicable law, subpoena, or court order.
5. To share a document containing a social security number with a person not authorized to receive a social security number under subsection B, District personnel must make reasonable efforts to redact social security numbers from the document.
6. District personnel authorized to receive social security numbers will make reasonable efforts to destroy each document containing a social security number when it is no longer needed by shredding or incinerating it, subject to record retention requirements. See Policy 3502.
7. The District will not display a social security number on its checks.

###### B. District Personnel Authorized to Receive Social Security Numbers

1. The following persons may receive a social security number in the course of performing their duties:
  - Superintendent;

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- Chief business official;
  - Chief human resources official.
2. If District personnel or a Board member encounters a document in the District's possession containing a social security number of another person in the course of performing District duties, that person should give the document to a person authorized to receive social security numbers.

#### C. FOIA Requests

The District will make reasonable efforts to redact social security numbers from all documents produced in response to a FOIA request.

#### D. Penalties

1. A Board member who knowingly violates this Policy may be censured by the Board.
2. An employee who knowingly or negligently violates this Policy may be subject to discipline. See Policies 4309, 4408, 4506, and 4607.

***Legal authority: 5 USC 552a; 42 USC 405; MCL 445.81 et seq.***

***Date adopted: 10/23/23***

***Date revised:***