

Chapter 320, Records and Archives

Section 22, Collection and Confidentiality of Social Security Numbers

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Responsible Department: Campus Counsel

Source Document: California Civil Code Section 1798.85

I. Purpose

This section explains the requirements of the Federal Privacy Act and amendments regarding requests by the University for Social Security numbers as well as California Civil Code section 1798.85 regarding confidentiality of Social Security numbers. This section also outlines policy and procedures for assuring that the requirements of those laws are met.

II. Background

The Federal Privacy Act restricts the circumstances under which the University may ask persons for their Social Security numbers. Persons may not be required to provide their Social Security numbers (although they may be asked to volunteer the information) unless obtaining the number is required by Federal law, State law, or a regulation that was in effect prior to January 1, 1975. California Civil Code section 1798.85 limits the University's use of Social Security numbers. The intent of the amendments is to protect Social Security numbers from being stolen and to prevent identity theft.

III. Policy

A. Approval of requests for disclosure of Social Security numbers

1. University departments are authorized to collect Social Security numbers in the following situations:
 - a. Collection of Social Security numbers from employees
Employees are required to provide their Social Security numbers on payroll/personnel, UC-sponsored health insurance, and retirement forms.
 - b. Collection of Social Security numbers from students
Students are required to provide their Social Security numbers for admission, registration, financial aid, and student housing contract purposes.
 - c. Collection of Social Security numbers from patients
Patients are required to provide their Social Security numbers on inpatient and outpatient registration forms.
2. Other forms that request disclosure of Social Security numbers, and proposals by departments to collect Social Security numbers for any purpose, must be approved in advance by the Information Practices Coordinator in consultation with University Counsel and must be strictly voluntary. Individuals who decline to disclose the number in situations other than those listed above may not be denied any rights, benefits, or privileges.

B. Disclosure statements

1. All forms upon which persons are either required or requested voluntarily to provide their Social Security numbers must contain or have appended to them a statement explaining the University request and its purpose. The disclosure statement must be approved in advance by the Office of Campus Counsel.

C. Confidentiality of Social Security numbers

1. A person's Social Security number is personal information and may not be redisclosed or used for any purpose other than the purpose for which it was collected, except as provided in the applicable policies pertaining to access to information (see [Sections 320-20](#) and [320-21](#)).
2. Pursuant to California Civil Code section 1798.85 the University is prohibited from:
 - a. Publicly posting or publicly displaying an individual's Social Security number.
 - b. Printing an individual's Social Security number on any card required for the individual to access products or services provided by the University.
 - c. Requiring an individual to use his or her Social Security number to access an Internet Web site, unless a password or unique personal identification number is also required to access the site.
 - d. Printing an individual's Social Security number on any materials that are mailed to the individual, unless state or federal law requires the social security number to be on the document to be mailed.
 - 1) Notwithstanding this paragraph, Social Security Numbers may be included in application forms sent by mail, including documents sent as part of an application or enrollment process, or to establish, amend or terminate an account, contract or policy, or to confirm the accuracy of the Social Security number.
 - 2) A Social Security number that is permitted to be mailed under this section may not be printed, in whole or in part (e.g., the last four digits), on a postcard or other mail not requiring an envelope, or visible on the envelope or without the envelope having been opened.
 - e. Encoding or embedding the Social Security number in or on a card or document, including, but not limited to, using a bar code, chip, magnetic strip, or other technology, in place of removing the Social Security number as an effort to comply with these new provisions.

IV. Further Information

For further information contact the Information Practices Coordinator, Office of Campus Counsel, (530) 754-6295.

V. References and Related Policies

- A. [California Civil Code Section 1798.85](#).
- B. [Business & Finance Bulletin RMP-8](#), Legal Requirements on Privacy of and Access to Information, 7/1/92.
- C. UC Davis Policy and Procedure Manual:
 1. [Section 310-22](#), UC Davis Cyber-Safety Program.
 2. [Section 320-20](#), Privacy of and Access to Information.
 3. [Section 320-21](#), Privacy and Disclosure of Information from Student Records.