

University of St. Thomas Policy for the Collection of Social Security Numbers for All University Students.

Policy: A Social Security Number must be provided by the student at the time the student submits a confirming deposit or other notification of intent to enroll in a university program. International students that do not have an assigned Social Security Number will be assigned a unique alternate number by the International Student Services Office.

Rationale: The University of St. Thomas (UST) creates a unique student identification number for each individual who has requested information from the university. The assigned student number permits students to apply to St. Thomas without providing a Social Security Number (SSN). However, a Social Security Number must be collected at the point the student confirms their intent to enroll. The admission file will be reviewed and an admission decision will be made without a Social Security Number.

The university must have a Social Security Number to comply with the federal IRS requirement for the completion of a 1098-T Payment Statement for every student who paid tuition. Section 6109 of the Internal Revenue Code requires the student to provide their SSN so the 1098-T can be filed. Failure of the student to provide a correct SSN will result in inaccurate tax reporting and could subject the student to IRS penalties.

The University of St. Thomas is in contact with agencies/services that require a sharing of student data. All of these agencies/services require a SSN as the student identifier. The agencies/services include, but are not limited to Veteran Affairs, National Student Clearinghouse, Independent Loan and Guarantor Verification, Cross-Registrations with ACTC schools, State Agencies Verifications and Credentials Verifications for Federal agencies(FBI, CIA, etc.), TransferTrack (used for Student Right-to-Know Act and IPEDS Graduation Rate Survey), and Minnesota Higher Education Services Office. Much of this information is shared electronically with thousands of records at a time.

Protection of Student Information: To carry out university business, some UST employees must have access to the student record system. Access is granted to employees on a need basis and is approved by formal request to the employee's business manager or department authorized person. Prior to the access being granted, employees must complete appropriate classroom or on-line system training and sign the UST Privileged Access and Confidentiality Agreement. This agreement specifically calls attention to the privilege they have been granted and states that in the course of carrying out their job responsibilities employees will not disclose private information without proper authorization, and will not access, report on, extract or disclose information that is not required in their normal job functions and responsibilities. The agreement (signed by all employees granted access to the student record system) extends beyond electronic access and is applied equally to information stored in both information systems and on university paper records.

Policies and procedures are in place and reviewed on a regular basis to ensure the protection of all sensitive data. UST is committed to protecting the privacy of all members of the St. Thomas community.