

GUIDELINES: Collection and Use of Social Security Numbers

1. INTRODUCTION

Pursuant to SAM 01.D.06, the duties of the Privacy Officer include, in part, the issuing of guidelines with regard to the use of social security numbers (“SSN”). This document provides guidelines for the protection of the confidentiality of SSN. As provided by section 2.5 of SAM 01.D.06, it is the responsibility of each component university of the University of Houston System (the “System”) to adhere to these guidelines.

2. PURPOSE

The purpose of these guidelines is to protect the confidential nature of SSN without creating unjustified obstacles to the conduct of the business of the component universities and the provision of services to its many constituencies. Nothing in these guidelines is intended to prohibit or restrict the collection, use, and maintenance of SSN as required by applicable law.

These guidelines are based on public policy and privacy issues and not on convenience or past practices. Nevertheless, the financial burdens and the potentially disruptive nature of reprogramming and immediate conversions of business and information systems must be balanced with the potential risk to individual privacy from the collection, maintenance, and use of SSN.

3. DEFINITIONS

- 3.1. **Employee:** Both full-time and part-time positions at a component university, whether the position is filled or to be filled by a regular or temporary worker, and including student workers and faculty.
- 3.2. **Student:** Means an individual who is or who has been in attendance at a component university. It does not include persons who have been admitted but do not attend any university within the University of Houston System. For the purpose of these guidelines “attendance” includes attendance in person or by correspondence (including electronic correspondence) or the period during which a person is working under a work-study program.
- 3.3. **Individual:** Any person who does not fit the definition of an employee or student and whose social security number is collected by a component university.
- 3.3. **SSN Coordinator(s):** Each component university should designate individual(s) within the organization to serve as the component university’s SSN Coordinator(s). The reporting structure for the SSN Coordinator(s) shall be determined by the component university. The responsibilities of the SSN Coordinators are listed in section 9.4.

4. USE AND COLLECTION OF SSN

- 4.1. The use of SSN as an individual's primary identification number shall be discontinued, unless applicable law requires such use. The SSN may continue to be stored as a confidential attribute associated with an individual.
- 4.2. If the collection and use of SSN is permitted, but not required, by applicable law, the institution shall use and collect SSN only as reasonably necessary for the proper administration or accomplishment of the component university's business, governmental, and educational purposes, including, but not limited to:
 - a. As a means of identifying an individual for whom a unique identification number is not known; and
 - b. For internal verification or administrative purposes.
- 4.3. Except in those instances in which a component university is legally required to collect a SSN, an individual shall not be required to provide their SSN, nor shall the individual be denied access to the services at issue if the individual refuses to disclose their SSN. An individual, however, may volunteer their SSN as an alternate means of locating a record or accessing services. Examples of federal and state laws that require the collection or use of SSN are included in Exhibits A and B. Questions about whether a particular use is required by law should be directed to the component university's SSN Coordinator(s).
- 4.4. A component university may, but is not required to, designate only selected offices and positions as authorized to request that an individual disclose their SSN.
- 4.5. Each component university shall:
 - a. Assign a unique identifier for each then-current student, employee, research subject and patient; and
 - b. Assign a unique identifier for each future student, employee, research subject, patient, alumnus, donor, contractor and other individuals who become associated with the component university at the earliest possible point of contact with the component university.
- 4.6. The unique identifier shall be used in all future electronic and paper data systems to identify, track and serve individuals associated with the component university. The unique identifier shall:
 - a. Be a component of a system that provides a mechanism for the public identification of individuals;

- b. Be permanent and unique within the component university and remain the property of, and subject to the rules of, the component university;
 - c. Not be derived from the SSN of the individual; or, in the alternative, if the unique identifier is derived from the social security number, it must be computationally infeasible to ascertain the social security number from the corresponding unique identifier.
- 4.7. All component university services and electronic business systems shall rely on the identification services provided by the unique identifier system.

5. NOTIFICATION OF INDIVIDUALS

- 5.1. Each time a component university requests that an individual disclose his or her social security number, the component university shall provide the notice required by Section 7 of the Federal Privacy Act of 1974 (5 U.S.C. § 552a), which requires that the component university inform the individual whether the disclosure is mandatory or voluntary, by what statutory or other authority the number is solicited, and what uses will be made of it.
 - a. The notice shall use the applicable text from Exhibit C included in these guidelines or such other text as may be approved by the SSN Coordinator(s) of the component university in consultation with the Privacy Officer.
 - b. It is preferable that the notice be given in writing, but if at times it will be given orally, the component university shall implement procedures to assure and document that the notice is properly and consistently given.
 - c. Existing stocks of forms need not be reprinted with the disclosure notice; the notice may be appended to the form. Future forms and reprints of existing stock shall include the notice printed on the form.
- 5.2. In addition to the notice required by the Federal Privacy Act, Section 559.003 of the Texas Government Code requires that when the SSN is collected by means of a printed or electronic form the component university must state on the form or prominently post on the Internet site in connection with the form that, with few exceptions, the individual is entitled to be informed about the information that the component university collects on them. In addition to those requirements, Sections 552.021, 552.023 and 559.004 of the Texas Government Code state the individual is entitled to receive and review the information the component university requests from them and have the component university correct any inaccurate information that has been collected.

6. PUBLIC DISPLAY OF SSN

- 6.1. Grades may not be publicly posted or displayed in a manner in which all or any portion of either the SSN or the unique identifier identifies the individual associated with the information.
- 6.2. The SSN may not be displayed on documents that can be seen by the general public (such as time cards, rosters, and bulletin board postings) unless required by law. This section does not prohibit the inclusion of the SSN on transcripts or on materials for federal or state data reporting requirements
- 6.3. If a component university sends materials containing SSN through the mail, it shall take reasonable steps to place the SSN on the document so as not to reveal the number in the envelope window. In the alternative, the component university may leave the SSN field blank and ask the individual to complete and return the document. (In that event, however, the component university must include the notice required in Section 5 above).
- 6.4. The component university shall prohibit employees from sending SSN over the Internet or by e-mail unless the connection is secure or the SSN is encrypted or otherwise secured. The component university shall require employees sending SSN by fax to take appropriate measures to protect the confidentiality of the fax (such measures may include confirming with the recipient that the recipient is monitoring the fax machine).
- 6.5. Each component university shall comply with Section 35.58 of the Texas Business and Commerce Code, pertaining to printing an individual's SSN on a card or other access device.

7. CONTROL OF ACCESS TO SSN

- 7.1. The component university shall limit access to records containing SSN to those employees who need to see the number for the performance of the employees' job responsibilities.
- 7.2. The component university shall monitor access to records containing SSN by the use of appropriate measures as reasonably determined by the component university.
- 7.3. The component university shall protect the security of records containing SSN during storage using physical and technical safeguards (such safeguards may include encrypting electronic records, including backups, and locking physical files).

- 7.4. Records containing SSN should not be stored on component university or personal computers or other electronic devices that are not secured against unauthorized access.
- 7.5. SSN may not be shared with third parties except:
 - a. As required or permitted by law; or
 - b. With the written consent of the individual; or
 - c. Where the third party is the agent or contractor for the component university and the safeguards described in Section 7.6. are in place to prevent unauthorized distribution; or
 - d. As approved by the Privacy Officer.
- 7.6. When SSN are shared with a third party that is the agent or contractor for the component university, a written agreement should be entered into to protect the confidentiality of the SSN as required by these guidelines. The component university should hold the third party accountable for compliance with the provisions of the written agreement through regular monitoring or auditing. The written agreement should:
 - a. Prohibit the third party from disclosing the SSN, except as required by law; and
 - b. Require the third party to use adequate administrative, physical, and technical safeguards to protect the confidentiality of records or record systems containing SSN.

8. PROTECTION OF SSN AND SECURITY SAFEGUARDS

- 8.1. Each component university shall require its employees to secure records containing SSN in accordance with the component university's security plan.
- 8.2. Records or media (such as disks, tapes, hard drives) containing SSN shall be discarded:
 - a. In a way that protects the confidentiality of the SSN, such as shredding, reformatting, erasing, or otherwise modifying the material to make it unreadable or indecipherable; and
 - b. In accordance with the component university's records retention schedule.
- 8.3. All systems acquired or developed after June 1, 2007 must comply with the requirements stated below.

- a. The system must use the SSN only as a data element or alternate key to a database and not as a primary key to a database;
- b. The system must not display SSN visually (such as on monitors, printed forms, system outputs) unless required by law or permitted by these guidelines; and
- c. Name and directory systems must be capable of being indexed or keyed on the unique identifier, once it is assigned, and not on the SSN.

9. PROTECTION AND CONFIDENTIALITY OF SSN

9.1. Each component university shall deliver training to its employees on the confidentiality of SSN and as provided in these guidelines. The content of the training should be developed by the component university's SSN Coordinator(s) in consultation with the Privacy Officer. The training may be delivered electronically to employees through the utilization of a web-based application such as WebCT. The training on the confidentiality of SSN as provided in these guidelines may accompany the training on additional subjects such as compliance with the Family Educational Rights and Privacy Act ("FERPA") and the Gramm-Leach-Bliley Act ("GLB Act"). Following the initial training of employees, subsequent training shall be in accordance with the following schedule, or more frequently as determined by the component university:

- a. To all employees once every two years; and
 - b. To each new, temporary or contract worker within 30 days after the date of hire.
- 9.2. The component university shall require employees with access to SSN to acknowledge their awareness of these guidelines and the component university's internal policies and procedures for the protection of the confidentiality of SSN. The component university, at its option, may require this acknowledgment from all employees.
- 9.3. Each component university shall establish a schedule for risk assessments and audits of systems containing SSN.
- 9.4. The responsibilities of each SSN Coordinator shall include the following:
- a. Develop and implement a written security plan for records and record systems that contain SSN. The security plan shall include administrative, physical, and technical safeguards.
 - b. Coordinate with the other component university SSN Coordinators to develop System-wide educational materials for the training required by

- these guidelines and to develop System-wide Web pages to serve as resource materials;
- c. Review and approve the proposed use of SSN in any new electronic system to be acquired or developed by the component university;
 - d. Oversee the implementation of and monitor compliance with these guidelines at the component university;
 - e. Meet periodically with the other SSN Coordinators to ensure uniformity across the System in the implementation of these guidelines;
 - f. Provide support, guidance and problem resolution with these guidelines and applicable component university policies and procedures;
 - g. Serve as the intermediary between departments within the component university and the Privacy Officer with respect to matters pertaining to the collection, use or disclosure of SSN, the preparation of disclosure notices for requests for SSN that are not covered by pre-approved disclosure notices, and contractual provisions governing releases of SSN to third parties. Requests for releases of SSN pursuant to the Public Information Act are not governed by this document and will be handled in accordance with System Administrative Memorandum 03.H.02 and the applicable policies of the component university;
 - h. Designate the component university office to be responsible for maintaining and administering the unique identifier;
 - i. Maintain a list of pre-approved third parties to whom the component university may release SSN; and
 - j. Maintain a record set of pre-approved disclosure notices to be used when SSN are requested and pre-approved contractual provisions for use when a component university releases SSN to a third party that is the agent or contractor for the component university.
- 9.5. The component university shall require employees to report promptly inappropriate disclosure of SSN to their supervisors, who shall report the disclosure to the SSN Coordinator(s). Reporting by the employee may be anonymous, in accordance with the component university's compliance program, if the employee so chooses. Retaliation against an employee who in good faith reports an inappropriate disclosure of SSN is prohibited. If the supervisor and SSN Coordinator(s) determine that SSN were inappropriately disclosed and individuals have been put at risk of identity theft or other harm as a result of the disclosure, the component university shall take all reasonable steps to promptly notify the individuals affected.

- 9.6. Component universities shall adopt procedures applicable to employees and students to implement these guidelines. The procedures shall stipulate that a person who fails to comply with these guidelines may be subject to appropriate disciplinary action, including discharge or dismissal in accordance with the component university's policies and procedures, and shall include the following:
- a. Employees and students shall comply with these guidelines and related component university policies and procedures;
 - b. Employees may not request disclosure of a SSN if it is not necessary and relevant to the purposes of the component university and the particular function for which the employee is responsible;
 - c. Employees and students may not disclose SSN to unauthorized persons or entities;
 - d. Employees and students may not seek out or use SSN relating to others for their own interest or advantage; and
 - e. Employees responsible for the maintenance of records containing SSN shall observe all component university-established administrative, technical, and physical safeguards in order to protect the confidentiality of such records.

EXHIBIT A
FEDERAL STATUTES AND REGULATIONS
THAT MANDATE OR AUTHORIZE THE USE OF SOCIAL SECURITY NUMBERS

(Last revised February 13, 2008)

Note: The chart below contains brief summaries of selected statutes and regulations. It is intended as a reference only and does not necessarily include all applicable laws and regulations. The reader is advised to consult with legal counsel.

General Purpose	Authorized or Required Use	Statute or Regulation
Blood donation	Authorizes states and political subdivisions to require that a blood donor provide his or her social security number.	42 U.S.C. §§ 405(c)(2)(D)(i), 1320b-11
Blood donation	Authorizes states to require a donor to provide his or her social security number and requires states to provide the social security number to request data from Blood Donor Locator Service.	20 C.F.R. § 401.200
Charitable contributions	Requires a donee to include on the donee's information return the donor's social security number if the donee disposes of a charitable contribution (other than cash or publicly traded securities) within two years of the gift.	26 C.F.R. § 1.6050L-1
Classified information	Requires employers licensed by the Nuclear Regulatory Commission to obtain authorization form from NRC in order for employees to access classified information and to identify employees by name and social security number.	10 C.F.R. § 25.17
Contracts and grants	Requires those doing business with a federal agency to furnish social security numbers to the agency (for example, lenders in a federal guaranteed loan program and applicants for federal grants, licenses, or permits).	31 U.S.C. § 7701(c)

General Purpose	Authorized or Required Use	Statute or Regulation
Contracts and grants	Department of Defense regulation regarding pre-award procedures: requires the collection of social security number from each grant recipient to enable department to check for delinquent accounts as required by 31 U.S.C. § 7701.	32 C.F.R. § 22.420
Contracts and grants	With respect to certain federal and federally assisted construction contracts, requires reports to include employees' social security numbers for equal employment opportunity reports.	41 C.F.R. § 60-4.3
Employment	Authorizes an employer to examine an alien's social security number card for verification of eligibility for employment.	8 U.S.C. § 1324a(b); 8 C.F.R. § 274a.2
Employment	Requires an employer to furnish for the State Directory of New Hires the social security number of an employee.	42 U.S.C. § 653a
Employment	Requires employer to include social security number in annual report of wages of individual.	20 C.F.R. § 404.452
Employment	Requires an employee to provide the employer with the employee's social security number.	26 C.F.R. § 31.6011(b)-2
Employment	Requires the employer to include the employee's social security number on the Form W-2.	26 C.F.R. § 31.6051-1
Employment	Requires employers to use the employee's social security number on required reports pertaining to deferred vested retirement programs.	26 C.F.R. § 301.6057-1

General Purpose	Authorized or Required Use	Statute or Regulation
Explosive materials and weapons of mass destruction	Provides that it is a federal crime to import, manufacture, or deal in explosive materials without federal license. Requires a person who purchases, distributes, or receives explosive materials to furnish his or her social security number to the Attorney General. Requires an employer to submit personal information about employees who will possess explosive materials via federal license.	18 U.S.C. § 842(f)
General	Authorizes states to collect and use social security numbers in administering any tax, general public assistance, driver license, or motor vehicle registration law.	42 U.S.C. § 405(c)(2)(C)(i)
Health care	Requires that, as a condition of eligibility for Medicaid benefits, applicants for and recipients of such benefits furnish their social security numbers to the state administering the program.	42 U.S.C. § 1320b-7(a)(1)
Health care	Requires states to obtain parents' social security numbers before issuing a birth certificate, unless good cause exists for not doing so.	42 U.S.C. § 405(c)(2)(C)(ii)
Health care	Requires social security numbers on death certificates.	42 U.S.C. § 666(a)(13)
Health care	Authorizes manufacturers and distributors to use social security numbers for tracking life sustaining or life supporting medical devices used outside a medical facility if failure of the device would result in serious adverse health consequences.	21 C.F.R. §§ 821.25, 821.60, 821.55
Health care	Requires that organ procurement organizations maintain records of organ donors by obtaining personal identifying information, including social security number of donor.	42 C.F.R. § 486.330

General Purpose	Authorized or Required Use	Statute or Regulation
Health care education	Requires hospitals that incur indirect costs for graduate medical education programs to furnish the social security number for each resident.	42 C.F.R. § 412.105
Health care education	Requires that hospitals that receive Medicare payment for direct graduate medical educational activities identify residents by social security number.	42 C.F.R. § 413.75
Nuclear reactors	Requires holder of Nuclear Regulatory Commission license to operate nuclear power reactor to have FBI perform criminal history check on employees and authorizes holder to obtain identification information including social security number.	10 C.F.R. § 73.57
Radiation safety	Requires employers licensed by the Nuclear Regulatory Commission to provide radiation exposure data and authorizes the employer to use the social security number as identifying data.	10 C.F.R. § 19.13
Radiation safety	Requires employers with Nuclear Regulatory Commission license to notify employees regarding overexposure to radioactive materials and identify employees by social security number.	10 C.F.R. § 20.2203
Radiation safety	Requires employers licensed by Nuclear Regulatory Commission to report medical event and radiation dose to embryo/fetus/nursing child and identify persons by name and social security number.	10 C.F.R. §§ 35.3045, 35.3047
Radiation safety	Requires Department of Energy contractors operating sites or facilities licensed by Nuclear Regulatory Commission to issue reports to employees regarding radiation exposure at DOE sites or facilities and requires identification of employees by name and social security number.	10 C.F.R. § 835.801

General Purpose	Authorized or Required Use	Statute or Regulation
Radiation safety	Requires employee to furnish appropriate identifying data, such as the social security number, to receive reports.	41 C.F.R. §§ 50-204.33, 50-204.36
Student loans	Requires an institution to verify the borrower's social security number. Requires the use of a common financial aid form whereby institutions of higher education collect the information on the form, including the social security number of parents of dependent children seeking federal financial assistance. Requires a student to submit social security number to receive any grant, loan or work assistance. Requires institutions of higher education to verify social security number in the national student loan database and to include the social security number in certain reports and in loan assignments.	20 U.S.C. §§ 1078, 1078-2(f), 1090(a)(7), 1091(a)(4)(B), 1092, 1092b; 34 C.F.R. §§ 668.16, 668.33, 668.36, 674.41, 674.42, 674.50, 682.604, 685.304
Student loans	Requires social security number for certain student loan applications for the health professions, such as doctors and nurses participating in the Health Education Assistance Loan Program (HEAL). Requires schools to give notice regarding any change in status of student, to identify students by social security number, and to maintain current records on students, including verification of social security number and the student's citizenship.	42 C.F.R. §§ 57.206, 57.306, 60.51, 60.53, 60.56

General Purpose	Authorized or Required Use	Statute or Regulation
Tax matters	Requires that the social security number be the taxpayer identification number and requires that a person who must file a return, statement, or other document under the Internal Revenue Service Code include the social security number as the taxpayer number (withholding and annual reporting on Forms W-2 and 1099 are included in this requirement).	26 U.S.C. §§ 3402, 6051, 6103, 6109; 26 C.F.R. §§ 301.6109-1, 301.7701-11

EXHIBIT B

TEXAS STATUTES AND REGULATIONS

THAT MANDATE OR AUTHORIZE THE USE OF SOCIAL SECURITY NUMBERS

(Last revised February 19, 2008)

Note: The chart below contains brief summaries of selected statutes and regulations. It is intended as a reference only and does not necessarily include all applicable laws and regulations. The reader is advised to consult with legal counsel.

General Purpose	Authorized or Required Use	Statute, Regulation, or Other Authority
Contracts	Requires that the bid or application to provide property, materials, or services to a state agency, or to receive a state funded grant or loan include the name and social security number of the individual, sole proprietor, and each partner, shareholder, or owner with an ownership interest of 25%.	Texas Family Code §§ 231.006, 231.302
Education	Pertains to reports to the Texas Higher Education Coordinating Board in the "CBM Reporting Series." Requires the disclosure of student and faculty social security numbers in reports to the Coordinating Board with respect to data that institutions of higher education are required to report. The reporting manual permits an assigned 9-digit number if the student does not have a social security number. The reporting manuals are on the board's website at: http://www.thecb.state.tx.us/DataAndStatistics/	CBM Reporting Manuals
Education	Requires that complaints involving improper conduct against an educator within a school, including a charter school, be addressed to the State Board for Educators Certification and include the educator's name and social security number.	19 Tex. Admin. Code § 249.14
Employment	Entitles institutions of higher education to obtain criminal history record information for evaluating applicants for employment in security sensitive positions. The Department of Public Safety may require institutions of higher education to submit an individual's social security number for identification purposes.	Texas Government Code §§ 411.094, 411.086
Employment	Requires an employer to take notice of a court order or writ for spousal maintenance, which may be combined with a child support order, and withhold income for child support payments and remit the payment with certain information, including the payor's name and social security number and the payee's name and social security number, unless the payment is transmitted to the payee by electronic funds transfer.	Texas Family Code §§ 8.152, 158.203
Employment	Requires an employer to furnish to the State Directory of New Hires a report of all new hires that contains certain information from the employee's W-4 form, including social security number.	Texas Family Code § 234.001; 1 Tex. Admin. Code § 55.303

General Purpose	Authorized or Required Use	Statute, Regulation, or Other Authority
Employment	Requires payroll reports to the State Comptroller for agencies that do not use Uniform Statewide Payroll/Personnel System to include employee's name and social security number.	34 Tex. Admin. Code § 5.41
Employment	Requires employer to report to the State Comptroller the name and social security number of the employee from whose salary or wages a deduction for the employee's membership in employee organizations is made.	34 Tex. Admin. Code § 5.46
Employment	Requires agencies that allow deductions for payment to credit unions to include in report to the State Comptroller the name and social security number of each employee for whom deductions were made.	34 Tex. Admin. Code § 5.47
Employment	Requires deduction for contributions to charitable organizations form from employee to employer to include social security number. Cancellation also requires that the employer provide the employee's social security number to the State Comptroller.	34 Tex. Admin. Code § 5.48
Employment	Requires employers that are interested in shared work programs to obtain approval from the Texas Workforce Commission and include the names and social security numbers of employees involved in the plan.	Texas Labor Code § 215.022
Health care	Requires that reports to the Department of Health's cancer registry pursuant to the Texas Cancer Incidence Reporting Act include name and social security number of individual with cancer.	25 Tex. Admin. Code § 91.4
Health care	Requires that the form of birth certificates that is completed and filed by hospitals to include social security numbers of parents.	Health and Safety Code § 192.002
Health care	Enables state to provide medical assistance (including all health care, services and benefits authorized or provided under federal law) on behalf of needy individuals and enables state to obtain all benefits for those persons under the Social Security Act. Requires health insurers to maintain files that include the name, address, and social security number of each subscriber or policyholder covered by insurer. With respect to Medicaid health service, requires health insurers to maintain a file system that contains information for each policyholder or subscriber, including the social security number.	Texas Human Resources Code, Ch. 32 & § 32.042; 1 Tex. Admin. Code § 354.2341
Health care education	Requires that complaints about nurses be forwarded to the Board of Nursing Examiners and include the name and social security of the nurse. Requires nursing program to maintain records to include social security number of enrolled students in nursing program.	Texas Occupations Code Ch. 304; 22 Tex. Admin. Code §§ 213.13, 215.8
Law Enforcement	Requires an agency's chief administrator to report changes affecting an officer's licensure to the Texas Commission on Law Enforcement and include the licensee's name and social security number. Requires licensure of academy trainers of police cadets and requires academy to provide the name and social security number of proposed training coordinator and any academy staff instructors.	37 Tex. Admin. Code §§ 211.29, 215.3

General Purpose	Authorized or Required Use	Statute, Regulation, or Other Authority
Radiation safety	Pertains to requirements for possession and use of a source of radiation, including the maintenance of appropriate records that show the radiation exposure of certain individuals. Requires reports of certain overexposures to radiation to include name and social security of individual exposed. Requires reports of radiation exposures over the occupational dose to be reported to Texas Commission on Environmental Safety and include name and social security number of overexposed individual.	30 Tex. Admin. Code §§ 336.352, 336.405
Retirement programs	Authorizes a public retirement system to require a person to provide a person's social security number as the system considers necessary.	Texas Government Code § 815.503
Unemployment compensation	Requires records of employees and reports to Texas Workforce Commission to include employee names and social security numbers.	40 Tex. Admin. Code §§815.106, 815.107
Workers' compensation	Requires the social security number for a wide variety of reports and requests pertaining to workers' compensation claims.	Texas Labor Code §§ 402, 409, 413, 402.087; 28 Tex. Admin. Code §§ 41.15, 42.30, 102.8, 120.1, 120.4, 122.2, 122.5, 122.100, 131.3, 134.504

Exhibit C

Sample Disclosures

Disclosure for the employment process.

Federal law requires the University to report income and Social Security Numbers (“SSN”) for all employees to whom compensation is paid. Employee SSN are maintained and used by the University for payroll, benefits, internal verification, and administrative purposes, to verify employment, and to conduct background checks for security sensitive positions. The University reports SSN to Federal and State agencies or their contractors as authorized or required by law and for benefits purposes. Further disclosure of your SSN is governed by the Public Information Act (Chapter 552 of the Texas Government Code) and other applicable law.

Disclosure for the student application process.

Disclosure of your Social Security Number (“SSN”) is requested for the student records system of The University of Houston (the “University”) and for compliance with Federal and State reporting requirements. Federal law requires that you provide your SSN if you are applying for financial aid. Although an SSN is not required for admission to the University, failure to provide your SSN may result in delays in processing your application or in the University’s inability to match your application with transcripts, test scores, and other materials. Student SSN are maintained and used by the University for financial aid, internal verification, and administrative purposes, and for reports to Federal and State agencies as required by law. The privacy and confidentiality of student records is protected by law and the University will not disclose your SSN without your consent for any other purposes except as allowed by law.

General mandatory disclosure.

Disclosure of your Social Security Number (“SSN”) is required of you in order for The University of Houston to [state intended use of SSN], as mandated by [Federal] [State] law. Further disclosure of your SSN is governed by the Public Information Act (Chapter 552 of the Texas Government Code) and other applicable law.

General voluntary disclosure.

Disclosure of your social security number (SSN) is requested from you in order for The University of Houston to [state intended use of SSN]. No statute or other authority requires that you disclose your SSN for that purpose. Failure to provide your SSN, however, may result in [state what may happen if the individual fails to provide SSN]. Further disclosure of your SSN is governed by the Public Information Act (Chapter 552 of the Texas Government Code) and other applicable law.