

## Illinois State Police Merit Board Identity Protection Policy

The Illinois State Police Merit Board (ISPMB) adopts this Identity Protection Policy pursuant to the Identity Protection Act (5 ILCS 179/1 et seq.). The Identity Protection Act requires each local and State government agency to draft, approve, and implement an Identity Protection Policy to ensure the confidentiality and integrity of Social Security numbers (SSNs) it collects, maintains, and uses. It is important to safeguard SSNs against unauthorized access because SSNs can be used to facilitate identity theft. The Identity Protection Act was passed in part to require local and State government agencies to assess their personal information collection, maintenance, and usage practices, and make necessary changes to those practices to ensure confidentiality.

### **Social Security Numbers Protections Pursuant to Law**

Whenever a person is asked to provide the ISPMB with a SSN, the ISPMB shall provide that person with a statement of the purpose or purposes for which the data is being collected and will be used. The ISPMB shall also provide the statement of purpose upon request. A sample of such statement is attached to this Policy.

The Illinois State Police Merit Board shall not:

1. Publicly post or publically display in any manner a person's SSN. "Publicly post" or "publicly display" means to intentionally communicate or otherwise intentionally make available to the general public.
2. Print a person's SSN on any card required for the person to access products or services provided by the ISPMB.
3. Require a person to transmit a SSN over the Internet, unless the connection is secure or the SSN is encrypted.
4. Print a person's SSN on any materials that are mailed to the person, through the U.S. Postal Service, any private mail service, electronic mail, or any similar method of delivery, unless State or federal law requires the SSN to be on the document to be mailed. However, SSNs may be included in applications and forms sent by mail, including, but not limited to, any material mailed in connection with the administration of the

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Unemployment Insurance Act, any material mailed in connection with any tax administered by the Department of Revenue, and 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 SSN. A SSN that is permissibly mailed will not be printed, in whole or in part, on a postcard or other mailer that does not require an envelope or be visible on an envelope without the envelope having been opened.

5. Encode or embed a SSN in or on a card or document, including, but not limited to, using a bar code, chip, magnetic strip, RFID technology, or other technology, in place of removing the SSN as required by the Identity Protection Act.

In addition, the ISPMB shall not<sup>1</sup>:

1. Collect, use, or disclose a SSN from an person, unless:
  - a. Required to do so under State or federal law, rules, or regulations, or the collection, use, or disclosure of the SSN is otherwise necessary for the performance of the ISPMB's duties and responsibilities;
  - b. The need and purpose for the SSN is documented before collection of the SSN;  
and
  - c. The SSN collected is relevant to the documented need and purpose.
2. Require a person to use his or her SSN to access an internet website.
3. Use the SSN for any purpose other than the purpose for which it was collected.

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### **Requirement to Redact Social Security Number**

The ISPMB shall comply with the provisions of any other State law with respect to allowing the public inspection and copying of information or documents containing all or any portion of a person's SSN. The ISPMB shall redact SSNs from the information or documents before allowing the public inspection or copying of the information or documents.

When collecting SSNs the ISPMB shall request each SSN in a manner that makes the SSN easily redacted if required to be released as a part of a public records request.

### **Employee Access and Responsibility to Report any Breach of Security - Social Security Numbers**

The ISPMB directs that only employees who are required to use or handle information or documents that contain SSNs will have access to such information or documents. All employees who have access to SSNs in the course of performing their duties shall be trained to protect the confidentiality of such data. Training will include instructions on proper handling of information that contains SSNs from the time frame of collection through the destruction of the information.

<sup>1</sup> These prohibitions do not apply in the following circumstances:

1. The disclosure of SSNs to agents, employees, contractors, or subcontractors of a governmental entity or disclosure by a governmental entity to another governmental entity or its agents, employees, contractors, or subcontractors if disclosure is necessary in order for the entity to perform its duties and responsibilities; and if disclosing to a contractor or subcontractor, prior to such disclosure, the ISPMB must first receive from the contractor or subcontractor a copy of the contractor's or subcontractor's policy that sets forth how the requirements imposed under this Act on the ISPMB to protect an person's SSN will be achieved.

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2. The disclosure of SSNs pursuant to a court order, warrant, or subpoena.
3. The collection, use, or disclosure of SSNs in order to ensure the safety of State and local government employees and all persons working in or visiting a State or local government agency facility.
4. The collection, use, or disclosure of SSNs for internal verification or administrative purposes.
5. The disclosure of SSNs by the ISPMB to any entity for the collection of delinquent child support or of any State debt or to a governmental agency to assist with an investigation or the prevention of fraud.
6. The collection or use of SSNs to investigate or prevent fraud, to conduct background checks, to collect a debt, to obtain a credit report from a consumer reporting agency under the federal Fair Credit Reporting Act, to undertake any permissible purpose that is enumerated under the federal Gramm Leach Bliley Act, or to locate a missing person, a lost relative, or a person who is due a benefit, such as a pension benefit or an unclaimed property benefit.

## Illinois State Police Merit Board General Statement of Purpose **For the Collection of Social Security Numbers**

The Identity Protection Act, 5 ILCS 179/1 et seq., requires each local and State government agency to draft, approve, and implement an Identity Protection Policy. Each policy shall include a requirement to provide a requestor with a statement of the purpose or purposes for which the agency is collecting, maintaining, and using a person's Social Security number (SSN).

This statement of purpose is being provided to you because you have been asked by the Illinois State Police Merit Board to provide your SSN or because you requested a copy of this statement.

You are being requested to submit/provide your SSN for one or more of the following reasons:

- Permitting services
- Internal verification
- Administrative services including payroll processing and hiring
- Debt collection
- Registration/application/grant processing
- Compliance with Federal and State tax law and regulations
- Vendor services, such as executing contracts and/or billing

The Illinois State Police Merit Board will only use your SSN in accordance with the Illinois State Police Merit Board's Identity Protection Policy, available on the Illinois State Police Merit Board's website at <http://www.illinoistrooper.com>, or upon request to Chief Legal Counsel 217/785-2620