

PRIVACY PROTECTION POLICY

Applicability: This policy applies to all Oak Hill employees.

I. General Provisions.

Oak Hill is committed to protecting the privacy and identity of its employees and program participants. As part of our compliance with *P.A. No. 08-167, An Act Concerning the Confidentiality of Social Security Numbers*, Oak Hill has established this policy to: (1) protect the confidentiality of Social Security Numbers and other personally identifying information (collectively referred to herein as Social Security Numbers (“SSNs”)); (2) prohibit unnecessary disclosure of SSNs and (3) limit access to SSNs. As used in this policy, the phrase “personally identifying information” includes, but is not limited to:, state identification numbers, passport numbers, alien registration numbers, drivers’ license numbers, student numbers, DDS/DSS/DCF numbers, home addresses and telephone numbers and health insurance identification numbers.

II. Prohibited Conduct.

No employee shall:

- Use an individual’s SSN in any correspondence, email, reports, or other document unless expressly permitted below;
- Transmit an individual’s SSN through email, intranet or internet communications, unless encrypted and required on the particular document by the state agency of cognizance;
- Leave open and unattended computer screens that contain SSN;
- Leave paper documents and correspondence containing an individual’s SSN unsecured.

III. Permitted Uses.

SSNs may be used and disclosed for the following purposes:

- Human resources administration, including payroll, preparation of tax documents, W-9’s and IRS forms
- Criminal, DCF and other background checks used during the hiring process
- Benefits applications, enrollment and claim forms, documents and reports, including health insurance, dental insurance, life insurance, disability insurance, workers compensation, pension and annuity information
- Verification of professional credentials
- Communications on behalf of program participants and students with state agencies of cognizance

- In connection with obtaining and providing health and welfare benefits for our program participants
- Education records
- Billing and financial reporting for services rendered
- When required by state contracts
- When required by private foundations and other grant-making authorities for the purpose of applying for or providing information concerning the use of grant monies
- The administration of gifts, bequests, trusts and endowment funds

IV. State-Issued Professional License Holders.

Employees who hold a professional license, registration or certificate issued by a state agency (e.g., teacher, nurse, social worker) shall pursue any violations of this policy through the state agency's existing statutory and regulatory authority.

V. Security Measures.

Once collected, departments with the authority to collect and use SSNs will implement and maintain practices that keep the information safe from individuals who have no work-related reason to access said information.

VI. Document Disposal.

All paper and electronic documents shall be disposed of in accordance with Oak Hill's Document Retention Policy.

VII. Civil Penalties for Violation.

State law makes an intentional violation of P.A. 08-167 subject to a penalty of \$500 for each such violation, provided that such civil penalty shall not exceed \$500,000 for any single event.

VIII. Disciplinary Action

Violation of this policy may subject employees to disciplinary action up to and including separation from employment.

Cross-Reference: Computer and internet Use
Confidentiality and Privacy
Protecting Documents and Data
Document Retention Policy

Approved: August 20, 2008