

	FGCU POLICY 3.024	Responsible Unit: Human Resources
	Notification of Social Security Number Collection and Usage	

A. POLICY STATEMENT

Florida Gulf Coast University (FGCU) collects and uses social security numbers (SSN) of students and applicants for admission to Florida Gulf Coast University for limited purposes in performing its duties and responsibilities of administering federal and state financial aid and scholarship programs, including verification of eligibility and reporting metrics required by the Florida Board of Governors. FGCU also collects and uses employees’ social security numbers for the purpose of performing University duties and responsibilities. In order to protect the identity of applicants, students, and employees, FGCU will secure the social security numbers from unauthorized access and will not release it to unauthorized parties. Each student and employee shall be assigned a unique identification number, which is used for all associated employment and educational purposes.

B. REASON FOR POLICY

Florida law provides that public agencies, including FGCU, must notify individuals of the circumstances that would require the collection and use of SSNs. Section 119.071(5), Florida Statutes, specifically authorizes FGCU to disclose SSNs when it is necessary to perform its duties and responsibilities. This Policy provides the circumstances in which FGCU may collect and use SSNs and the legal authority for such collection and use. Where there is no specific legal authority provided, the authority is derived from section 119.071(5)(a)6, Florida Statutes, as related to FGCU’s duties and responsibilities.

C. PROCEDURES

1. Employees

- a. Upon hire, each employee shall be notified of the collection purpose and usage of their SSN. To ensure that an employee is properly linked to outside governmental entities such as the Internal Revenue Service (IRS), the SSN is used for any or all of the following legitimate business purposes:
 - 1) Completing and processing the federal I-9 (Department of Homeland Security) including E-Verification, if applicable, as required by the Immigration Reform and Control Act of 1986;
 - 2) Completing, processing, and distributing federal W4, W2, and 1099 (IRS), as required by the Internal Revenue Code under sections 3402(f)(2)(A) and 6109 and their implementing regulations;

- 3) Completing and processing federal social security taxes (FICA), as required by the Internal Revenue Code under sections 3402(f)(2)(A) and 6109 and their regulations;
 - 4) Completing and processing quarterly unemployment reports (Florida Department of Revenue);
 - 5) Completing and processing Florida Retirement Contribution Reports (Florida Division of Retirement), as permitted by section 119.071(5), Florida Statutes;
 - 6) Reporting work-related injuries (Florida Division of Risk Management), if applicable;
 - 7) Completing and processing direct deposit files (Bank of America, ACH), if applicable;
 - 8) Completing and processing 403(b) and 457(b) contribution reports, if applicable, as permitted by section 119.071(5)(a)6.g., Florida Statutes;
 - 9) Completing and processing group health, life, and dental coverage enrollment, if applicable, as permitted by section 119.071(5)(a)6.f., Florida Statutes;
 - 10) Completing and processing various supplemental insurance deduction reports, if applicable, as permitted by section 119.071(5), Florida Statutes; and
 - 11) Completing and processing immigration related documents, if applicable, as required by the Immigration and Control Act of 1986, 8 USC 1324.
 - 12) Reporting unclaimed property to the State of Florida, as required by section 717.117, Florida Statutes.
- b. It is a condition of employment that employees are required to provide their SSN to FGCU.

2. Students

- a. FGCU collects SSNs from applicants for admission to FGCU for the purpose of completing and processing verification of eligibility for financial aid and scholarship programs. To ensure applicants and students are properly linked to outside governmental agencies, such as the IRS, the SSN is used for any or all of the following legitimate business purposes:
 - 1) For use in student admission and enrollment and included as part of the student's demographic record, including to coordinate transition from one educational

institution to another, as may be required by section 483 and 484 of the Higher Education Act (HEA) of 1965, as amended;

- 2) For use in scholarships and financial aid, including as required by federal law for financial aid reporting, financial aid transactions, and federal work study, as may be required by section 483 and 484 of the Higher Education Act (HEA) of 1965, as amended;
- 3) Completing and processing Florida prepaid billing, third party billing, third party collections and student tax documents in the normal course of business, including identification as permitted by section 119.071(5)(a)7., Florida Statutes;
- 4) Completing and processing FAFSA verification to assure all aid is awarded to students according to federal, state, and institutional regulations and in the normal course of business, as permitted by section 119.071(5)(a)7., Florida Statutes;
- 5) Administering federal and state programs or loans, including verification of eligibility. These programs include, but are not limited to:
 - a) Financial aid and other related loan programs;
 - b) Scholarship programs, including Florida Bright Futures; and
 - c) Veterans administration benefits for qualified students;
- 6) For use in complying with IRS reporting requirements pertaining to the Hope Scholarship Credit and the Lifetime Learning Credit provided under federal regulations;
- 7) For use in preparing student enrollment reports required to be submitted to the National Student Loan Data System under federal law;
- 8) For use in providing official student transcripts to authorized third-parties (i.e. educational institutions and employers upon receipt of required releases) for student identification purposes;
- 9) For enrollment verification and eligibility for health insurance coverage, auto insurance coverage, and benefits, as requested by students;
- 10) For submitting reports to the Florida Board of Governors as required by section 483 and 484 of the Higher Education Act of 1965; or as necessary under section 1001.706, Florida Statutes; and
- 11) For reporting unclaimed property to the State of Florida as required by section 717.117, Florida Statutes.

Authority

*BOG Regulation 1.001, University Board of Trustees Powers and Duties;
Section 119.071(5), Florida Statutes*

History of Policy

*New 10/01/07; Amended 12/2008; Amended 10/27/09; Format Changed 09/10/19; Amended
06/10/21*

APPROVED

 */s/Michel V. Martin
Michael V. Martin, President

 June 10, 2021
Date