

Approved: February 17, 2026
Resolution No. 26-371

1. **PURPOSE.** It is the policy of Gratiot County to fully protect the confidentiality of Social Security Numbers to the most practicable extent. No person shall knowingly acquire, disclose, transfer, or use the Social Security Number of any employee or other individual unless in accordance with the procedures and rules established by this policy and pursuant to federal and state law.

2. **AUTHORITY.**
 - 2.1. Authority to establish rules and regulations in reference to the management of the interest and business concerns of the county is vested with the Gratiot County Board of Commissioners (MCL 46.11(m)). Policies shall be subject to revision or termination by the Board at its discretion.

 - 2.2. The Michigan Social Security Number Privacy Act (MCL 445.81, *et seq.*) requires adoption of a privacy policy to assure confidentiality.

3. **APPLICATION.** This policy applies to all County employees.

4. **RESPONSIBILITY.** It shall be the responsibility of the County Administrator, Department Heads, Elected Officials and Agencies of Gratiot County to administer this policy.

5. **DEFINITIONS.**
 - 5.1. ***“Publicly display”*** means to exhibit, hold up, post, or make visible or set out for open view, including, but not limited to, open view on a computer device, computer network, website, or other electronic medium or device, to members of the public or in a public manner.

6. **POLICY.**
 - 6.1. **Public Display.** Social Security Numbers shall not be placed on identification cards, badges, timecards, employee rosters, bulletin boards, or any other materials or documents designed for public display.

- 6.2. Access. Only persons authorized by the department head or elected official shall have access to Social Security Numbers.
- 6.3. Mailed or Transmitted Documents. County documents containing Social Security Numbers shall only be sent in cases where state or federal law, rule, regulation, or court order or rule authorizes, permits, or requires that Social Security Numbers appear in the document. Documents containing Social Security Numbers that are sent through the mail shall not reveal the number through the envelope window or otherwise be visible from outside of the envelope or package. Social Security Numbers shall not be sent through email unless the connection is secure or the number is encrypted. No person shall be required to send his or her Social Security Number by email unless the connection is secure or the number is encrypted.
- 6.4. Public Records. Where a Social Security Number is disclosed within a document subject to release under the Freedom of Information Act, the Social Security Number shall be redacted.
- 6.5. Storage and Disposal. All documents or files that disclose Social Security Numbers shall be stored in a physically secure manner. Social Security Numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access. Documents or other materials containing Social Security Numbers shall not be thrown away in the trash but shall be discarded or destroyed only in a manner that protects their confidentiality such as shredding.
- 6.6. Information Collected. Social Security Numbers should only be collected when required by federal or state law or otherwise permitted under the Michigan Social Security Number Privacy Act.
- 6.7. Accountability. Any person who fails to comply with this policy shall be subject to discipline, up to and including discharge.
- 6.8. Interpretation. This policy shall be interpreted and construed in accordance with the Michigan Social Security Number Privacy Act.
7. **ADMINISTRATIVE PROCEDURES**. Each elected official and department head shall be responsible for development of any administrative procedures necessary to comply with this policy and the Michigan Social Security Number Privacy Act.
8. **ADMINISTRATOR AND LEGAL COUNSEL REVIEW**. The Administrator shall approve all new and amended policies as to substance. The County Civil Counsel shall approve all new and amended policies as to legal content. These approvals shall accompany draft policies and amended policies submitted to the Board of Commissioners for consideration and approval.