

## Responses of State FOA Contacts to Social Security Number Information Request

Update November 1, 2011

Agency	Context of collection	Treatment, release, protection, etc.
Maine Criminal Justice Academy, DPS	collects SSNs in a "notice of employment/termination" form that it uses.	Generally speaking, as a matter of policy, law, or both, the department would not intentionally disseminate SSNs it collects, to the general public.
Maine Emergency Medical Services, DPS	collects SSNs in certain license application forms that are used by that office.	Generally speaking, as a matter of policy, law, or both, the department would not intentionally disseminate SSNs it collects, to the general public.
Maine State Police, DPS	may collect SSNs in its incident investigation reports.	Generally speaking, as a matter of policy, law, or both, the department would not intentionally disseminate SSNs it collects, to the general public.
Maine State Police Traffic Division, DPS	SSNs in its inspection technician applicant form.	Generally speaking, as a matter of policy, law, or both, the department would not intentionally disseminate SSNs it collects, to the general public.
Maine State Police, State Bureau of Identification, DPS	collects SSNs that are submitted to that bureau on, e.g., fingerprint cards and court documents; the bureau maintains the SSNs as "unique identifier" information.	Generally speaking, as a matter of policy, law, or both, the department would not intentionally disseminate SSNs it collects, to the general public.
Bureau of Capitol Police, DPS	2 may collect SSNs as a principal identifier "in the Master Names Files of the IMC Records Management Software," as well as in bureau incident investigation reports.	Generally speaking, as a matter of policy, law, or both, the department would not intentionally disseminate SSNs it collects, to the general public.
The Gambling Control Board, DPS	collects SSNs in the license application form used by the board.	Generally speaking, as a matter of policy, law, or both, the department would not intentionally disseminate SSNs it collects, to the general public.

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The State Fire Marshal's Office, DPS	may collect SSNs in its incident investigation reports.	Generally speaking, as a matter of policy, law, or both, the department would not intentionally disseminate SSNs it collects, to the general public.
Department of Marine Resources	obtains SSNs as part of its marine resources licensing system. It is a line item on virtually all applications.	Along with all other data, it is then entered into our licensing database: MRLEN. We do not have a written policy regarding the release of SSNs. Although by unwritten policy we do not release SSNs when licensing info requests are made. However anyone with access to MRLEN has access to these numbers
State Treasurer, as Unclaimed Property Administrator	<ul style="list-style-type: none"> <li>• Collects and maintains records that may contain SSN pursuant to 33 MRSA §1958, sub-§2, (b)</li> <li>• Collects SSNs from claimants, not only for verification but also in the event an Internal Revenue Service for 1099 must be issued</li> <li>•</li> </ul>	Maintain in paper reports and on a data based and is used to verify claimant ownership to specific property
Treasurer	Old accounting system included payee's SSN when Treasurer collected vendor codes for stop payments and reissues of state-issued checks. Since accounting system has been updated, SSNs are not part of the vendor code and are no longer collected or stored	
Department of Inland Fisheries and Wildlife	Collects SSNs from license applicants although required only from commercial licenses Also assign a MOSES ID number they can use in place of SSN	Any SSNs collected are exempt from FOA as provided in 1 MRSA §402, sub-§3, ¶N
Department of Inland Fisheries and Wildlife, Warden Service	Common practice to record SSN in a law enforcement investigation and record it in our LE records management system	This is protected privacy act information and would be redacted electronically from any records prior to release (if not covered by one of exceptions in CHRIA)

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State Planning Office	Don't deal with information that contains SSN - any information requested that would deal with employee information is referred to the Bureau of Human Resources	
Ethics Commission	Uses a customized version of the State's vendor form and EFT form which must be completed by publicly funded legislative and gubernatorial candidates - both require either SSN or EIN	Work closely with DPFS in DAFS to set up candidates in State's AdvantageME system as vendors to receive funds under the Maine Clean Election Act. Copy at DPFS and at Ethics Commission Practice is to redact SSNs or bank account numbers from copies of forms in response to other requests
Department of Conservation: Administration	<ul style="list-style-type: none"> <li>• The number is on every job application and becomes, with the addition of two suffix zeroes the employee's identification number</li> <li>• Now have separate vendor number that gets used for expense account vouchers Human Resources collects SSNs for all employees</li> <li>• SSNs appear on all job applications, and the application of the ultimate hire goes on file</li> <li>• Worker's comp forms</li> <li>• Travel reimbursement vouchers</li> </ul>	Employee identification number shows up on every payroll distribution printout
Department of Conservation: Forest Policy and Management	SSN or TIN required for all reimbursements to state "vendors", which includes recipients of cost share funds for Forest Stewardship Plans. Used to create a vendor code	<ul style="list-style-type: none"> <li>• Vendor code used on all subsequent documents whenever reimbursements are needed</li> <li>• SSNs and TINs that are collected for cost share payments are protected as confidential by statute (12 MRSA §8005, sub-§§1 and 2)</li> <li>• SSNs and TINs we collect reside in a database that is not viewable by the outside world; only a small number of employees can access the database</li> </ul>

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Department of Conservation: Forest Protection	<p>When the Forest Protection Division applies for reimbursement from other jurisdictions for sending fire crews out of state, it submits SSN of each ranger on the crew</p> <p>Collect SSNs of civilian fire crews who supplement staff on deployments</p>	
Public Utilities Commission	Does not collect SSNs	
Maine Health Data Organization	<ul style="list-style-type: none"> <li>• Collect SSNs of patients as part of the data submissions of the hospitals (90-590 CMR Chapter 241).</li> <li>• Encrypted SSNs are also submitted by health insurers and TPA's as part of the MHDO's claims database.</li> </ul>	<ul style="list-style-type: none"> <li>• The SSNs are used internally and not for public distribution. In fact, 22 MRSA Section 8707 (1) expressly prohibits the MHDO from releasing any direct identifiers (which are defined under 90-590 CMR Chapter 125) to the public.</li> <li>• The only exception to this is the release of direct identifiers (which can include SSNs) to the ME CDC for use in an investigation or research project of substantial public health importance.</li> <li>• The SSNs stay encrypted and are encrypted again before release to the public.</li> </ul>
Public Advocate	<p>The only time that I can recall that a form other than a state agency form or state retirement form has received someone's social security number is when an individual was financing or refinancing a mortgage and the bank sends along their already completed bank form for you, the employer to review to approve and say that their job is in good standing and yes that do make what they are claiming.</p> <p>What follows is a list of where social security numbers are used within the Public Advocate Office:</p> <ul style="list-style-type: none"> <li>• Retirement papers - forms</li> <li>• Life insurance/beneficiaries – forms</li> </ul>	<ul style="list-style-type: none"> <li>• The Public Advocate Office does not make it a practice to provide anyone outside of this office with anyone's social security number.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Direct hire applications – forms</li> <li>• Position detail reports</li> <li>• Human resource profile</li> <li>• Dental forms</li> <li>• Health Insurance forms</li> <li>• Payroll reports</li> <li>• Voluntary Cost Savings applications/forms</li> </ul>	
Finance Authority of Maine	<p>Following categories of records in which SSNs are collected pursuant to FAME’s mission, business and education finance, as well as employee-related purposes:</p> <ul style="list-style-type: none"> <li>• Credit reports</li> <li>• Account, loan and grant applications and servicing forms</li> <li>• Tax returns</li> <li>• Financial statements</li> <li>• Loan and grant records</li> <li>• Accounts payable documentation</li> <li>• Employment, including employee benefit and payroll records</li> </ul>	<p>Policies and procedures to ensure that SSNs are not inappropriately released:</p> <ul style="list-style-type: none"> <li>• Avoidance of unnecessary collection of such personal information</li> <li>• Secure e-mail and electronic transmission capabilities</li> <li>• Confidentiality and privacy policies, including review of all permitted information planned to be sent out prior to release</li> <li>• Locked file-rooms and office cabinets</li> <li>• Screening of agents and vendors an related contract provisions requiring continued confidential treatment and security of such information</li> <li>• Safe destruction practices</li> <li>• Limited employee access to such data</li> <li>• Employee training</li> <li>• Statutory provisions generally prohibiting release of confidential information</li> </ul>

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Office of Information Technology	<p>Not “collected” by OIT, but OIT administers information systems</p> <p>SSNs exist within 112 databases or tables today in ten different departments</p> <ul style="list-style-type: none"> <li>• 82 instances = DHHS, DAFS and MDOL</li> <li>• Federal regulation and transactions related to payments, expenditures and taxes are basic reasons</li> <li>• SSN is a unique identifier, a reporting key field along with name for tax and client services, and is used as a “de-duplicator” (a mechanism to match similar names to a single person) to assure accurate processing and to thwart fraud</li> </ul>	<ul style="list-style-type: none"> <li>• 32 systems have external access by non-state users (most often the person who is assigned the SSN) - all but two within DHHS, DAFS and MDOL</li> <li>• Allows a citizen to authenticate himself or herself as they do business with or report activity</li> <li>• Heavily protected and extra care taken to assure compliance with Federal and State law</li> </ul> <p>(More detail withheld to avoid disclosing the individual IT applications, potentially making them more susceptible to attempts to penetrate security)</p>
DAFS, Bureau of General Services	<p>Central Fleet and Central Services</p> <ul style="list-style-type: none"> <li>• Employees who must be tested for Class II license provide SSN on the form</li> </ul>	
	<p>Leased space -</p> <ul style="list-style-type: none"> <li>• A few older leases have the SSN identified in the lease as the Vendor Information Number - number used in remitting payment to the landlord</li> <li>• No longer keeps SSNs or VINs on file - all new leases use Vender Ids</li> </ul>	<ul style="list-style-type: none"> <li>• Leases available for inspection by the public, but prior to the visit a copy of the document is reviewed and SSNs redacted</li> </ul>
	<p>Planning, Design and Construction</p> <ul style="list-style-type: none"> <li>• Do not collect SSN for own processes</li> <li>• Must collect payroll information to satisfy Title 26, §1311 (wage and benefit record of contractor) and contracting agency (BGS or others) receives records that initially have such personal information</li> </ul>	<ul style="list-style-type: none"> <li>• BGS Rule Chapter 150 outlines the process by which SSNs are prohibited from being transferred to the State agency</li> </ul>

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	<p>Purchases</p> <ul style="list-style-type: none"> <li>SSNs and/or federal Employer Identification Numbers (EIN) are collected for purposes of confirming vendor's identities when they register in the State Controller's AdvantageME/Vendor Self Service financial accounting and procurement system. SSN collected only vendors who are independent contractors within an EIN, which is a small percentage</li> <li>Procurement cards formerly required full SSN, but now use only last four digits</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>Once a vendor's identity has been confirmed, the system assigns a separate vendor-specific Vendor/Customer Number (VCN) that is not based on SSN or EIN. VCN used on contract documents and purchase orders</li> <li>SSN used on contracts when no EIN prior to 7/1/07 - those documents scanned into FORTIS document management system, which is available to state agencies who have Purchases' permission to access. When public requests copies of contracts, we provide copies without redacting SSN</li> </ul>
	<p>Risk Management</p> <ul style="list-style-type: none"> <li>Does not collect SSN except as required for federal income tax reporting purposes</li> </ul>	<ul style="list-style-type: none"> <li>When collected, SSNs kept in claim files that are not accessible to anyone other than staff of Risk Management, the State's Archivist and Attorney General; also kept in database accessible by only Risk Management staff</li> </ul>
<p>DAFS, Division of Financial and Personnel Services - Service Centers</p>	<ul style="list-style-type: none"> <li>Personnel and payroll records and reports - all expenditures relating to payroll payments require a SSN for identification purposes</li> </ul>	<ul style="list-style-type: none"> <li>SSN are blackened and permanently covered on any documents required to be scanned</li> </ul>
	<ul style="list-style-type: none"> <li>Eye examination and reimbursement form - require SSN for identification and payment</li> </ul>	<ul style="list-style-type: none"> <li>Used for internal purposes only</li> </ul>
	<ul style="list-style-type: none"> <li>Travel expense vouchers - recent change in procedure has eliminated need for SSNs on travel expense reimbursement forms - employees TAMS ID number is now used as the unique identifier for payment purposes</li> </ul>	

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	<ul style="list-style-type: none"> <li>Inmate records - used by the Service Center are for internal purposes only</li> </ul>	
DAFS, Bureau of Human Resources	Recruitment records <ul style="list-style-type: none"> <li>Employment Applications - for internal use only</li> <li>Certificate of Eligibles (certifications)</li> </ul>	<ul style="list-style-type: none"> <li>Applications               <ul style="list-style-type: none"> <li>Hard copy maintained within the BHR for three years and then destroyed</li> <li>On-line applications maintained in a secure database</li> </ul> </li> <li>Maintained within BHR for three years then destroyed</li> </ul>
	Personnel records <ul style="list-style-type: none"> <li>All State of Maine employees issued an employee number at the time of hire = SSN plus two trailing numbers</li> <li>Following forms have a space for SSN or Employee Number               <ul style="list-style-type: none"> <li>Employment eligibility verification form</li> <li>Personnel file authorization form</li> <li>Office notice of layoff</li> <li>Request for placement on the reemployment register</li> <li>New hire</li> <li>General employee information</li> <li>Termination form</li> <li>Retroactive personnel record adjustment worksheet</li> <li>Continuation of benefits coverage</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>BHR maintains a secure database of current and former employees' records and also fiche copies of older records</li> <li>Employee records released to the Maine Public Employees Retirement System (MePERS) in the form of paper copy, fiche or emailed images</li> <li>All personnel forms are for internal use only - if a document is requested for legal matters, the SSN is redacted by the AG's Office or the Office of Employee Relations</li> </ul>

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	<ul style="list-style-type: none"> <li>• Voluntary employee incentive program worksheet</li> <li>• Repayment of shutdown days</li> <li>• Voluntary employee incentive program application</li> <li>• Five percent salary option form</li> <li>• Retirement plan &amp; benefits options form</li> <li>• Register update form</li> <li>• Performance management form</li> <li>• Record of employee discipline</li> <li>• Request for placement on the transfer/demotion register</li> <li>• 3 month promotion report</li> <li>• Verification certification</li> <li>• Statement concerning your employment in a job not covered by Social Security</li> </ul>	
	<p>Other records</p> <ul style="list-style-type: none"> <li>• The four collective bargaining agreements with MSEA and the Maine State Law Enforcement Association require the State to transmit “employee data” including SSN, to the unions on a quarterly basis</li> </ul>	
	<p>Employee Health &amp; Benefits</p> <ul style="list-style-type: none"> <li>• All applications require SSN in order to access the employee record in payroll and make changes to benefit plan deductions; SSN is the only consistent identifier throughout all programs</li> <li>• Health, dental and vision plans use an ID number, but not SSN</li> <li>• Centers for Medicare and Medicaid Services require periodic reporting of employment status as</li> </ul>	<ul style="list-style-type: none"> <li>• Enrollment/change applications are maintained in office of Employee Health &amp; Benefits <ul style="list-style-type: none"> <li>• Maintained until employee terminates service or is deceased, and then maintained for two years, moved to Records Center for five years, then destroyed</li> <li>• Retiree health insurance applications are maintained in the office until death. At time of</li> </ul> </li> </ul>

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	<p>well as health plan coverage type - their forms use SSN</p>	<p>death, maintained for one year, moved to Records Center for 20 years, then destroyed</p> <ul style="list-style-type: none"> <li>• Monthly premium reports for health, dental and vision are maintained in the office <ul style="list-style-type: none"> <li>• Health and vision premium reports are kept for three years then destroyed</li> <li>• Dental is kept for two years, moved to Records Center for five years, then destroyed</li> </ul> </li> <li>• COBRA election forms - maintained in the office for one year, moved to the Records Center for two years, then destroyed</li> <li>• Deferred Compensation 457 Plan - maintained in the office and not destroyed</li> <li>• Billing Systems - databases, including SSNs, on server with the Office of Information Technology. Files can be transmitted from carriers to OIT and downloaded in the office</li> </ul>
	<p>Federal Drug Testing Custody and Control forms are used and maintained in the office; SSN are required for identification. Results of the tests also provide SSN as the means of identification</p>	<p>Federal Drug Testing Custody and Control forms</p> <ul style="list-style-type: none"> <li>• A third party issues numbers for the random tests and has no access to the SSNs of State employees in the pool</li> <li>• Results are matched with the custody and control forms - the database is maintained and secured in the office on BHR file server with OIT; related forms and results are filed in locked cabinets</li> </ul>
	<p>Workers' Compensation Division</p> <ul style="list-style-type: none"> <li>• SSN used as a means of identifying clients</li> <li>• Also use other identifiers such as Employee Number from Human Resources (SSN + 2 digits)</li> <li>• TAMS number (employee number assigned by employer)</li> </ul>	<ul style="list-style-type: none"> <li>• Forms and letters shared as necessary with the employee, employee's employer, attorneys, Workers' Comp Board and other state agencies as needed (such as AG, MDOL, Retirement, State Controller, medical providers, the employee's union) - usually sent through the mail or e-mail</li> </ul>

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	<ul style="list-style-type: none"> <li>• WC Division claim number</li> <li>• WC Board claim number</li> <li>• HICN number</li> </ul>	<ul style="list-style-type: none"> <li>• A number of contractual agencies/ vendors that receive SSN <ul style="list-style-type: none"> <li>• Medical case management agencies</li> <li>• Surveillance companies</li> <li>• Medical bill auditors</li> <li>• Law firms (ours and claimants')</li> <li>• 10-day medical provider network</li> </ul> </li> <li>• Claims management program is on a secure server and is accessed by "departmental designees" in all departments of State government</li> <li>• Electronically submit data using FTP and sending from and to secure websites <ul style="list-style-type: none"> <li>• Matrix Rx</li> <li>• MSIGA (Maine State Guarantee Authority)</li> <li>• Workers' Comp Board</li> <li>• Eastside Wellness sites</li> <li>• MePERS</li> <li>• ISO Claim Search</li> <li>• OSHA</li> <li>• Advantage (State's accounting database)</li> <li>• CMS Section 111 (Federal Mandate by Centers for Medicare)</li> </ul> </li> </ul>
	<p>Forms that contain SSN</p> <ul style="list-style-type: none"> <li>• Employment Status Report</li> <li>• Employee's Return To Work Report</li> <li>• Request for Expedited Proceeding</li> <li>• Limited Certificate Authorizing Written</li> <li>• Certificate Authorizing Release</li> <li>• Lump Sum Settlement</li> <li>• Statement of Compensation Paid</li> <li>• Employer's Supplemental Report</li> </ul>	

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	<ul style="list-style-type: none"> <li>• Wage Statement</li> <li>• Schedule Of Dependent(s) and Filing</li> <li>• Memorandum of Payment</li> <li>• Discontinuance or Modification of Comp</li> <li>• Consent Between Employer and Employee</li> <li>• Certificate Authorizing Release of Benefits</li> <li>• Certificate of Discontinuance or Reduction</li> <li>• Notice of Controversy</li> <li>• Request for Independent Med Exam</li> <li>• Employer's First Report of Occ. Injury</li> <li>• Restoration of Sick or Vacation Time</li> <li>• State of Maine New Vendor/Vendor Up</li> <li>• Worker's Compensation Reimbursement</li> <li>• WC - Lost Time Tracking</li> <li>• Transitional Duty Plan Form</li> <li>• Return to Work Referral Form</li> <li>• ER or EE Petition Package</li> <li>• Affidavit Regarding Lump Sum Settlement</li> <li>• Employee's First Report of Injury</li> <li>• Designee's Supplemental Report</li> <li>• Request For Medical Case Management</li> <li>• Request For Surveillance</li> <li>• Memo To Transfer Med Records</li> <li>• Widow(Er) Update</li> </ul>	
DAFS, Maine Revenue Services	<p>MRS processes tax returns and other tax related documents year round; SSN is used as the unique identifier for individuals and some businesses; uniform identifier that is also used by other states, the IRS and other state agencies within Maine State Government</p> <ul style="list-style-type: none"> <li>• SSN required when tax forms are filed and, in some cases, when corresponding with MRSA regarding a</li> </ul>	<ul style="list-style-type: none"> <li>• Federal and state law require strict confidentiality of taxpayer information, including SSNs</li> <li>• Except for purposes of tax processing and administration or when dealing with the taxpayer or the taxpayer's authorized representative, and except as authorized by Title 36, section 191, subsection 2, taxpayer information may not be divulged,</li> </ul>

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	<p>specific amount</p> <ul style="list-style-type: none"> <li>• When corresponding with the taxpayer, MRS generally asks for identifying information other than the SSN, such as notice numbers or electronic confirmation numbers, so as to minimize the use of SSN whenever possible</li> </ul>	<p>discussed or otherwise released</p> <ul style="list-style-type: none"> <li>• Generally, SSNs not printed on tax forms, assessments, refund checks or tax correspondence issued by the bureau <ul style="list-style-type: none"> <li>• Exception: certain compliance-related assessments that legally require the taxpayer's identification number and for certain sales tax and withholding income tax forms when a sole proprietor uses their SSN as the business identification number (MRS discourages this practice)</li> </ul> </li> <li>• All tax information is kept on site at secure MRS facilities</li> <li>• All paper tax returns are scanned and stored electronically and the originals are shredded on site</li> <li>• Taxpayers that file electronically do so over a secure internet connection; that information is also stored electronically</li> <li>• Certain paper files relating to compliance and criminal investigation cases are stored in a locked vault at the MRS secure building site that requires a pass key to gain access and has outside/entrance surveillance cameras and security guard presence 24-hours a day</li> <li>• The IRS periodically reviews MRS policy and procedure to ensure compliance with the safeguard requirements for confidential taxpayer information.</li> <li>• New employee and periodic confidentiality training is required for all MRS employees and contractors.</li> <li>• Security envelopes are used for MRS correspondence, including return envelopes.</li> <li>• Browsing of taxpayer records either paper or electronic system is prohibited, subject to dismissal</li> </ul>

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		<p>and monetary penalties.</p> <ul style="list-style-type: none"> <li>• Other agencies with whom MRS corresponds for tax administration purposes, including the IRS, other Maine agencies and other states, must also abide by the strict confidentiality requirements.</li> <li>• MRS has an established policy in the event of an inadvertent disclosure of confidential taxpayer information.</li> </ul>
<p>DAFS, Bureau of Lottery and Alcoholic Beverages</p>	<p>Lottery Ticket claims</p> <ul style="list-style-type: none"> <li>• If someone claims a winning ticket of \$600 and over, the Bureau requires the claimant to provide their SSN on the claim form; Bureau issues a W2G tax form and files with the IRS</li> <li>• Use SSN at time of claim to determine if an offset for nonpayment of taxes and/or child support or overpayment for unemployment benefits must be made against the claimant</li> </ul> <p>Lottery agent licensing</p> <ul style="list-style-type: none"> <li>• Application form asks for owner's SSN so Bureau can run a credit check</li> </ul>	<ul style="list-style-type: none"> <li>• SSN are not released to the public for any reason and the forms are filed in a secure location. If any of the forms are no longer needed, they are shredded</li> </ul>
<p>DAFS, Office of the State Controller</p>	<p>Maintains SSNs in both the accounting division for the payments to vendors and the payroll division for payments to employees. SSN is required to be maintained within systems for tax reporting to the IRS</p>	
	<p>Accounting System Usage</p> <ul style="list-style-type: none"> <li>• SSN stored in the accounting system on the vendor record</li> <li>• SSN field on vendor form</li> <li>• New vendors often established through their business activities with other department; new</li> </ul>	<ul style="list-style-type: none"> <li>• Although the vendor record is available to many users of the system, the SSN is masked (cannot be seen or accessed) to any users except employees of OSC</li> <li>• Only time the accounting system extracts SSN is when processing the 1099/W-2 forms that are</li> </ul>

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	<p>vendor form mailed to OSC for verification</p>	<p>mailed to vendors</p> <p>Prior to July 1/2007 and the new accounting system, the SSN was part of the vendor identification number and was a required element on all invoices submitted for payment. Those invoices have been scanned and stored within a FORTIS database as required documentation for audit. Documents are available to authorized uses within the OSC and other agencies.</p>
	<p>Payroll Usage SSN is a significant data element with the HR/Payroll system</p> <ul style="list-style-type: none"> <li>• Used as the employee number in addition to all tax-related reporting</li> <li>• The employee number (in the case of Human Resource System - SSN + 2 digits) is necessary to complete various payroll notifications, transfers and transactions <ul style="list-style-type: none"> <li>• Some requested by employee (direct deposit)</li> <li>• Required by law (wage garnishment or tax levies)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Within HR/Payroll, all employees authorized to work on payroll or personnel transactions have access to the system</li> <li>• All employees of OSC and employees within the Bureau of the Budget and Bureau of Human Resources have access</li> <li>• Entities receiving payroll information that includes SSN: <ul style="list-style-type: none"> <li>• Federal government <ul style="list-style-type: none"> <li>• IRS reporting of wages</li> <li>• US Savings Bond purchases</li> <li>• Student loan garnishments</li> </ul> </li> <li>• State agencies <ul style="list-style-type: none"> <li>• MDOL , Employment Security for employment data</li> <li>• Maine Revenue Services for wage reporting and state tax levies</li> <li>• DHHS for child support assignments</li> <li>• Employee Health and Benefits for health and dental data</li> </ul> </li> </ul> </li> <li>• External vendors (such as Anthem, Delta Dental, Unions per contract, Deferred Compensation per employee request)</li> </ul>

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Department of Professional and Financial Regulation	<p>Occupational and professional licenses</p> <ul style="list-style-type: none"> <li>Title 10, §8003, sub-§4-A: An individual who applies for a license shall provide that individual's SSN on the application, which must be recorded</li> <li>Title 36, §175, sub-§1: every department, board, commission, division, authority, district or other agency of the State issuing or renewing a license or other certificate of authority to conduct a profession, trade or business shall annually, on or before April 1st, provide to the State Tax Assessor a list of all licenses or certificates or authority issued or renewed; information to include SSN or federal identification number of licensees</li> </ul>	<ul style="list-style-type: none"> <li>Written advice from four Assistant Attorneys General and a consent decree in the U.S. District Court for the District of Maine have all taken the position that SSN collected by PFR pursuant to 36 §175, sub-§1 are confidential tax records that fall within the prohibition against non-disclosure contained in 36 §191, sub-§1</li> </ul>
	<p>The Office of Licensing and Registration has authority under state law to collect SSNs from licensure applicants and applicants for license renewal. SSNs of applicants are entered into the Agency Licensure Management System, the central licensing data base. If the agency ceased collecting SSNs, there would be no equally reliable way to identify licensees for licensing purposes. Cost of removing SSNs would be prohibitive.</p>	<p>Taking steps now to enhance the security of the licensing database (ALMS) by adding features to mask SSNs to eliminate the potential for inadvertent release of the confidential information</p>
		<p>Internal policy: Treatment of Social Security Numbers and other Personal Information by Agencies within the Department.</p> <ol style="list-style-type: none"> <li>PFR employees should not disclose or release SSNs contained in agency files. PFR employees receive frequent requests for copies of license applications and lists of licensees. Employees should redact any SSNs before sending out documents responsive to these requests.</li> </ol>

Agency	Context of collection	Treatment, release, protection, etc.
		<ol style="list-style-type: none"> <li>2. Each agency should designate an attorney or manager responsible for processing and responding to requests for personal information, including FOA requests. If a PFR employee receives a request from the public to review or copy documents containing personal information, the employee shall ask that the request be in writing. In addition, all responses to such requests shall be reviewed by the designated attorney or manager.</li> <li>3. In processing a public or FOA request, each agency should redact information protected by statute. In addition, the agency should determine whether the request can be responded to without supplying other personal information. Each agency may have specific information which is protected by law or regulation.</li> <li>4. When posting information on PFR's website, agencies should <i>not</i> post personal information, such as <b>home addresses</b> and <b>telephone numbers</b>. An exception to this rule would be in cases in which such information is directly applicable to a licensee's business, such as when a home address is also a business address or a home telephone number is also a business telephone number. Under no circumstances should SSNs be posted.</li> <li>5. Each agency should use its best efforts when collecting information to provide notice regarding whether the information will be treated as public or confidential information.</li> </ol>
DPFR, Office of Securities	Collects SSNs of individuals applying for licenses as agents or investment advisor representatives; also collects SSNs for those seeking license as broker-dealer or investment advisor if individual does not have	<p>32 MRSA § 16607, sub-§ 2, ¶ E specifically designates SSNs in possession of Office of Securities as nonpublic and not subject to disclosure; as a result:</p> <ul style="list-style-type: none"> <li>• SSNs redacted in hard copy; reports printed from</li> </ul>

Agency	Context of collection	Treatment, release, protection, etc.
	<p>Central Registration Depository number (CRD) is national database used by all 50 states and federal government to license or register agents and investment advisor representatives</p>	<p>CRD database exclude SSNs</p> <ul style="list-style-type: none"> <li>• SSNs collected as part of investigations and examinations would be redacted if records are disclosed pursuant to court order</li> </ul>
<p>DPFR, Bureau of Financial Institutions</p>	<p>The Bureau obtains SSNs in a variety of ways.</p>	<ul style="list-style-type: none"> <li>• As with other sensitive financial information, once an SSN is provided to the Bureau, it is a confidential record under 9-B M.R.S.A. 226 (the personal identifying information of consumers and governing body organizers of financial institutions is confidential).</li> </ul>
	<p>1) Applications.  The Bureau collects SSNs in its Financial and Biographical reports submitted as part of two Bureau applications/filings:  (A) Application to establish a new financial institution and  (B) Notice of Change in Control of a financial institution.  Both of these applications/filings are federal interagency (i.e., FDIC, FRB, OCC) filings. The SSNs are used to obtain background checks on potential principal owners, organizers, directors and executive officers of new and/or existing state-chartered financial institutions.</p>	<ul style="list-style-type: none"> <li>• The SSNs are accorded confidential treatment (by both the Bureau and the federal agencies) and are separated from public documents.</li> <li>• The protection- Confidential status under Title 9-B; Locked file room after business hours.</li> </ul>
	<p>2) Records of financial institution examinations.  In the process of examining Banks and credit unions, examiners obtain loan and deposit trial balances, usually in electronic form, that often contain sensitive information about customers, including SSN's.</p>	<ul style="list-style-type: none"> <li>• The protection: Confidential Status under Title 9-B; Electronic encryption; Locked file room after business hours.</li> </ul>

Agency	Context of collection	Treatment, release, protection, etc.
	Examination work product (known as Workpapers and usually in paper form), and Suspicious Activity Reports made by financial institutions, may also contain this sensitive information.	
	3) Consumer complaints.  Though not requested by the Bureau, a consumer occasionally sends along documents related to a consumer complaint or inquiry that contain an SSN.	<ul style="list-style-type: none"> <li>The protection: Confidential status under Title 9-B; The Bureau has begun redacting the SSNs and currently locks the complaint storage cabinet.</li> </ul>
	4) Personnel records.  The Human Resources Service Center B instructs us to retain employment applications for 2 years in a locked file cabinet. These applications as well as existing employee files contain SSNs.	<ul style="list-style-type: none"> <li>The protection: As per instructions of Human Resources, files are kept in a locked cabinet.</li> </ul>
DPFR, Bureau of Insurance	<p>The Bureau of Insurance uses social security numbers (SSNs) in several ways:</p> <ul style="list-style-type: none"> <li><b>Applications.</b> There are existing uniform licensing applications/forms developed by the National Association of Insurance Commissioners (NAIC) that allow a person to submit one uniform, electronic application to each state where the person wants to do business. Such applications use SSNs. Maine law requires applicants for insurance producer or business entity licenses to use NAIC applications.</li> </ul>	
	<ul style="list-style-type: none"> <li><b>Identity verification.</b> Maine law also requires insurance companies to submit a uniform license application. Both the insurance company license application and the forms filed in connection with</li> </ul>	

Agency	Context of collection	Treatment, release, protection, etc.
	<p>changes of ownership include biographical forms for the principal owners and managers. The biographical form uses the SSN to ensure that a proper background check is conducted. Because insurance products pay in the future, it is critical to protect the insurance consumers from fly-by-night and other unscrupulous operators. The SSN is used to help verify the identity of an individual and to conduct a thorough background check. This helps to ensure that insurance companies are operated by people without a history of civil/criminal violations.</p>	
	<ul style="list-style-type: none"> <li>• <b>Investigation.</b> SSNs are used in the Bureau's individual investigations and in multi-state investigation/enforcement actions.</li> </ul>	
		<ul style="list-style-type: none"> <li>• Recognizing the importance to protect SSN information, the Bureau has confidentiality agreements with other states and the NAIC. Furthermore, national databases in which SSNs are housed are searchable by SSN, but the SSN is not disclosed in the search results. SSNs are redacted prior to the release of information publicly.</li> <li>• SSNs are not available on the "find a licensee" function on our website</li> </ul>
DPFR, Consumer Credit Protection		<ul style="list-style-type: none"> <li>• We carefully review and manually delete all such numbers before any required release (such as in response to a FOIA request).</li> </ul>
<ul style="list-style-type: none"> <li>• Consumer Complaint Resolution</li> </ul>	<p>On complaint forms, especially for credit reporting complaint Necessary to resolve many types of complaints especially credit reporting agency complaints</p>	

Agency	Context of collection	Treatment, release, protection, etc.
	Critical 9-A MRSA §6-106 and 10 MRSA §1328(1)(A)	
<ul style="list-style-type: none"> <li>Registration of Loan Originators/Officers</li> </ul>	Application for Registration/Licensing State and federal SAFE Acts; 9-A MRSA 6-105-A To create unique identities for computer system (tracking in licensing system) Necessary	
<ul style="list-style-type: none"> <li>Licensing of Collection Agencies</li> </ul>	On license applications for sole proprietors and partnerships Background Checks Necessary 32 MRSA 11031(3)(A) (together with fingerprint cards)	
<ul style="list-style-type: none"> <li>Compliance examinations (audits)</li> </ul>	Staff reviews consumer loan documents as part of compliance exam process To conduct exams (audits) to check for compliance with Maine laws. Incidental to reviewing confidential consumer documents during examinations (unavoidable). Necessary 9-A MRS, Section 6-106,	
<ul style="list-style-type: none"> <li>Registration of Consumer Reporting Agencies</li> </ul>	1) At time of application for registration 2) Examination (audit) Investigations if necessary Facilitates investigations 10 MRSA §1328(1)(G)	
<ul style="list-style-type: none"> <li>Debt Mgmt Service Provider</li> </ul>	1) At time of application for registration 2) Examination (audit) Background check for sole proprietors/partners Necessary	

Agency	Context of collection	Treatment, release, protection, etc.
	32 MRSA §6173(2)	
<ul style="list-style-type: none"> <li>• Foreclosure Purchasers</li> </ul>	1) Application 2) Examination (audit) Identification/Background checks Necessary 32 MRSA §§6191-6200	
<ul style="list-style-type: none"> <li>• Exchange Facilitators</li> </ul>	At time of application for license Identification/Background checks Moderate 10 MRSA §1395 <i>et seq.</i>	
<ul style="list-style-type: none"> <li>• New Filers (MCCC1) - Sales Finance, General Creditors, Car Dealers, Mobile Home Dealers, Rent-to-Own, Pawn Brokers and Loan Servicers</li> </ul>	Application/Notification requests FEIN (company) or SS # (proprietor or partner) Identification Moderate 9-A MRS, §6-202	
<ul style="list-style-type: none"> <li>• Insurance Premium Finance Companies</li> </ul>	Application/Notification Requests Identification Moderate 9-A MRS §2-302	
<ul style="list-style-type: none"> <li>• Litigation Funding Providers</li> </ul>	Sole proprietor, partnerships, corporate officer, LLP, shareholder or LLP partners Identification/Examination/Investigation Necessary	
<ul style="list-style-type: none"> <li>• Loan Brokers</li> </ul>	1) At time of application for license; 2) During compliance exams/investigations Background checks/ Compliance exams	

Agency	Context of collection	Treatment, release, protection, etc.
	Necessary 9-A MRS §10-201	
<ul style="list-style-type: none"> <li>Payday Lender</li> </ul>	Sole proprietor, partnerships, corporate officer, LLP, shareholder or LLP partners Sole proprietor, partnerships, corporate officer, LLP, shareholder or LLP partners Background checks/Compliance exams Necessary 9-A MRS §1-201; 2-302 9-A MRS §1-201; 2-302	
<ul style="list-style-type: none"> <li>Supervised Lender</li> </ul>	Sole proprietor, partnerships, corporate officer, LLP, shareholder or LLP partners Identification/Examination/Investigation Necessary 9-A MRS §2-302	
<ul style="list-style-type: none"> <li>Payroll Processor</li> </ul>	At time of application for Sole proprietor, partnerships. Identification/Examination/Investigation Necessary 10 MRS, §1495 <i>et seq.</i>	
<ul style="list-style-type: none"> <li>Repossession Company</li> </ul>	At time of licensing and during exam (audit) (together with fingerprints) Identification/Examination/Investigation Necessary 32 MRS, §11001 <i>et seq.</i>	
Department of Audit	Collects SSNs in certain audits to identify specific individuals who are part of sample and population being tested; information used to link and track data through different electronic information systems  Examples include audits of state payroll and pension	<ul style="list-style-type: none"> <li>Small electronic files containing SSNs asked to be provided with password protection; larger files transmitted by compact disc</li> <li>Precautions taken to keep sensitive information confidential within secure building outside of State</li> </ul>

Agency	Context of collection	Treatment, release, protection, etc.
	information, tax revenues, vocational rehabilitation and Medicaid	<p>House complex, including workpapers with SSNs or other sensitive information kept in locked briefcases; spreadsheets containing SSNs encouraged to be viewed on computer and not printed out in written form; and SSNs never shared in written findings</p> <ul style="list-style-type: none"> <li>• After audits are completed, SSNs are redacted from electronic files and blacked out in written records to preserve confidentiality in those audit records required to be retained for certain period</li> <li>• Once retention period is over, electronic and paper audit files are permanently deleted or shredded; compact discs are destroyed by breaking them</li> </ul>
Department of Education	<p>SSNs collected as part of following computer systems:</p> <ul style="list-style-type: none"> <li>• Infinite Campus State Edition Student Information</li> <li>• Infinite Campus State Edition Staff Information</li> <li>• Maine Education Data Management System (MEDMS)</li> <li>• Maine Adult Education Management Information System</li> <li>• General Education Development (GED) System (Legacy)</li> <li>• Child Development Services (Case-E)</li> <li>• Licensing and Certification</li> </ul> <p>SSNs are also in possession of DOE as part of information submitted by individuals:</p> <ul style="list-style-type: none"> <li>• Job applications and related forms</li> <li>• Private school approval applications and annual</li> </ul>	<p>Security for SSNs collected by DOE provided by OIT in accordance with Computer Matching and Privacy Protection Act Agreement between Social Security Administration and State –data is confidential, but may be shared with authorized agencies; is not disclosed to public as part of FOA requests</p>

Agency	Context of collection	Treatment, release, protection, etc.
	<p>reports include staff names and SSNs</p> <ul style="list-style-type: none"> <li>• Home school parents required to submit name and SSN of certified teachers working with them</li> <li>• Certificates of employment of school superintendents</li> <li>• State Board of Education members vendor forms</li> <li>• Teacher certification applications and renewal applications include name and SSN</li> </ul>	
Maine State Housing Authority		
<ul style="list-style-type: none"> <li>• Homeownership</li> </ul>	Participating lenders load info into lender online. Info feeds to Emphasys' Applied Oriented Database (AOD).	<p>Information stored:</p> <ul style="list-style-type: none"> <li>• Lender Online - Encrypted software.</li> <li>• Paper files - Files locked. Staff locks confidential info work in progress in bins in locked room over night.</li> <li>• AOD Database - Password Protected (AOD Database)</li> <li>• Fortis</li> </ul> <p>Share info with servicers – SSN not included. Sent thru secure email server.</p>
<ul style="list-style-type: none"> <li>• Development</li> </ul>	Electronic copies of closing docs. AOD Database	<p>Information stored:</p> <ul style="list-style-type: none"> <li>• Fortis</li> <li>• AOD Database - AOD is password protected. Limited access in department</li> </ul>
<ul style="list-style-type: none"> <li>• Homeless <ul style="list-style-type: none"> <li>• Rental Assistance Coupon Plus (RAC+) Program</li> </ul> </li> </ul>	Applications for program	<p>Information stored:</p> <ul style="list-style-type: none"> <li>• File cabinets - Locked cabinets</li> <li>• Emphasys' Elite Database - Password protected database</li> <li>• Housing counselor work stations - Locked stations/offices</li> </ul>
<ul style="list-style-type: none"> <li>• Shelters</li> </ul>	Homeless Prevention and Rapid Re-Housing Program (HPRP) initiatives	HUD requests info be stored in the Homeless Management Information System (HMIS)
<ul style="list-style-type: none"> <li>• Homeless Management Information System</li> </ul>	Thru RAC+, Continuum of Care, Grant processes and input by partner agencies	HMIS Database Users have individual passwords – track usage.

Agency	Context of collection	Treatment, release, protection, etc.
(HMIS)		<p>Vendor contracts – required to safeguard under the Health Insurance Portability and Accountability Act.</p> <p>Training required before getting password.</p> <p>Info available for viewing only by user who entered it.</p> <p>Contracts govern interagency info.</p> <p>System maintained by company that maintains 90% of HMIS systems in the nation.</p> <p>Internal info does not contain SSNs. Kinney manages process to remove SSNs. Limited access.</p>
<ul style="list-style-type: none"> <li>Asset Management</li> </ul>	<p>Potential access to SSNs thru HUD’s Housing and Development Software (HDS) System or copies from management review.</p> <p>Signature Cards.</p>	<p>HDS System - Scanned to Fortis and paper copy shredded</p> <p>Paper - Signature card info in locked cabinet.</p>
	<p>Section 8 Applications</p> <p>Owner (landlord) information</p>	<p>Emphasys’ Elite software: In computer – accessed by internal users and section 8 agents. Approx 25 people access by security (password protected) and sign rules of behavior form.</p> <p>Paper Files: Paper includes copies of SS cards - locked in cabinet in secure area</p> <p>Anything printed with any identifying information is shredded.</p> <p>Anything sent electronically is encrypted and utilizes a secured file transfer system which is password protected.</p> <p>Info also obtained from HUD site – HUD blocks out all but last 4 digits of SSN and date of birth.</p> <p>W-9s for owners kept secured in Finance</p>
<ul style="list-style-type: none"> <li>Energy and Housing Services (EHS)</li> </ul>		
<ul style="list-style-type: none"> <li>Low Income Housing and Energy Assistance Program (LIHEAP)</li> </ul>	<ul style="list-style-type: none"> <li>LIHEAP Applications – SSNs are required for all family members to avoid duplication of benefits</li> </ul>	<p>Maine Energy Assistance and Conservation (MERAC) Database: Individual access limited to what the individual entered in the system</p> <p>MaineHousing monitors for compliance (client info locked up and not easily accessible to other parties)</p> <p>Data is de-identified for programming purposes to eliminate</p>

Agency	Context of collection	Treatment, release, protection, etc.
		connection to live data
<ul style="list-style-type: none"> <li>Weatherization</li> </ul>	<p>LIHEAP Application determines eligibility of persons receiving weatherization.</p> <p>Noted on form that collects energy use of household during billing phase.</p>	Paper – filed; Cabinet in room that is locked nightly.
<ul style="list-style-type: none"> <li>Housing Services (Home repair, elderly, etc)</li> </ul>	Application for services	<p>Electronic - Limited access (to EHS personnel)</p> <p>Paper – file cabinet - Cabinet in room that is locked nightly. Limited access (to EHS personnel); Cabinet in room that is locked nightly.</p>
<ul style="list-style-type: none"> <li>Finance</li> </ul>	<p>Vendors: Accounts Payable, Tenant Based rent, section 8, LIHEAP,HPRP</p> <p>Employee SSN</p>	<ul style="list-style-type: none"> <li>Emphasys’ Elite Database -</li> <li>Quickbooks</li> <li>Emphasys’ AOD Accounts Payable (A/P) System</li> </ul> <p>Emphasys/Elite Database,Quickbooks,AOD, A/P System – password protected, limited access</p> <ul style="list-style-type: none"> <li>Paper files: Paper files locked in cabinets in locked room with limited access</li> <li>Current payroll system is online: Payroll system is secure offsite. Does not allow SSNs to be shown</li> <li>Required by IRS to bulk send 1099 info electronically: FISC report received with name and SSN. Will not change. Finance blocks identifying info and shreds original report.</li> <li>Excel Files from other departments: Excel files are uploaded to IRS site which is password</li> </ul>
<ul style="list-style-type: none"> <li>Loan Servicing</li> </ul>	Access to info pre-loaded by Lenders/Serviceers	<ul style="list-style-type: none"> <li>Serviceers load SSN in Systems: Serviceers obligated and required to keep info secure and comply with State and Fed Regulations. MaineHousing annually performs quality control review to verify safe harbor.</li> <li>Loans loaded into Lender Online. Loads to AOD Database. Purchase detail loaded into AOD Database.</li> </ul>

Agency	Context of collection	Treatment, release, protection, etc.
		<p>AOD Database is password protected.</p> <ul style="list-style-type: none"> <li>• Staff locks work stations and keeps files in locked cabinets.</li> <li>• Access limited to default unit. No info to outside partners unless specifically requested by legal to do so and personally identifiable info is blanked out.</li> <li>• Info sent electronically is encrypted.</li> </ul>
<ul style="list-style-type: none"> <li>• Executive</li> </ul>	<p>For Commissioner – W-9 completed to reimburse expense logs</p>	<ul style="list-style-type: none"> <li>• Excel spreadsheet – Finance - Password protected excel spreadsheet in finance</li> <li>• Paper W-9s stored in locked lateral file in finance - Paper W-9s stored in locked lateral file</li> <li>• AOD accounts payable system - Password protected AOD accounts payable system</li> </ul>
<ul style="list-style-type: none"> <li>• Human Resource</li> </ul>	<p>SSN for employee benefit forms</p>	<p>Electronically &amp; Paper :</p> <ul style="list-style-type: none"> <li>• Sent via secure e-mail with 1<sup>st</sup> 6 digits of SSN blocked.</li> <li>• Recipient required to retrieve information for benefit forms from a secure site within our system that is password protected. Any paper is kept in a locked cabinet.</li> </ul>
<ul style="list-style-type: none"> <li>• Legal</li> </ul>	<p>from outside counsel for real estate closings (Real estate transfer tax, 1099 and W-9 forms)</p>	<p>Electronically in directories: Limited access to legal directory  Paper copies in designated filing room.  Closing binders scanned and retained in Fortis.</p> <p>SSNs redacted when responding to Freedom of Access requests.</p>
<ul style="list-style-type: none"> <li>• Treasury</li> </ul>	<p>Request for signature and social security numbers on signature cards for bank accounts</p>	<p>Finance: Locked cabinet in Finance</p>
<ul style="list-style-type: none"> <li>• Audit</li> </ul>		<p>Access to all directories (read only). Any info requested is asked to have personally identifiable info redacted.</p> <p>Working with Sage Data Security – independent party – to identify areas needing improved security</p>
<ul style="list-style-type: none"> <li>• Facilities</li> </ul>	<p>Request for offsite storage</p>	<p>Offsite at One Weston Court (secured building/secured room): Access limited to individuals accompanied by either the Internal Auditor or the facilities manager who physically</p>

Agency	Context of collection	Treatment, release, protection, etc.
	Record disposal for onsite	pull the record. Facilities manager logs in database who has record and when it is returned. Once files are approved for destruction, shredding on site comes to One Weston Court with facilities manager in attendance and shreds the records on site.  Onsite; Shredded on site
<ul style="list-style-type: none"> <li>Information Services (IS)</li> </ul>	(don't receive info directly)	Establishes security features for electronic records and educates staff  Encryption. Secure sites. Encrypt back up tapes that leave the site Contracted with external security firm to advise on good/better/best practices (evolving)
<ul style="list-style-type: none"> <li>Communications and Planning Unit (CPU)</li> </ul>	SSN of staff for Integrated Disbursement and Information System (IDIS) Access  Access to databases (AOD, RAC+, EHS)	Sent to HUD. Do not retain copies. SSNs redacted on any info retracted Password protected Limited access Mutual agreement not to include SSNs when sharing data
<p>Secretary of State</p> <ul style="list-style-type: none"> <li>Bureau of Corporations, Elections and Commissions</li> </ul>	Uniform Commercial Code - collection of SSNs required by federal law (Federal Food Security Act of 1985, §1324 requires an effective filing statement, used for recording a notice of a security interest in farm products, to provide the SSN or federal Internal Revenue Service taxpayer identification number (FEID) of the debtor on UCC filings recorded in CEC of SOS	The information is available on the images of the UCC filings and in the database = available to the public  No statute or rule to redact SSN or FEIN on UCC filings
<ul style="list-style-type: none"> <li>Bureau of Motor Vehicles</li> </ul>	BMV is required to collect and verify SSNs for driver licenses and identification cards (29-A MRSA §1301)  Motor carriers who register in the International Fuel Tax Agreement program use their SSNs if they do not have a FEID (29-A MRSA §525)	Personal information in BMV records, including SSN, is confidential (29-A MRSA §256)

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