

Management of Sensitive Information

Why do we collect Social Security Numbers?

In order to verify the identity of an individual, The Courtyards must collect Social Security Numbers which are the only precise identifier of an individual. No other information –be it full name, address, birthday, etc.—is as accurate at identifying an individual as a Social Security number. This precision is vital when reporting derelict accounts to our collections agency which then uses the Social Security Number to report the non-payment to a credit scoring agency.

Our ability to ensure consistent payment is dependent upon our ability to have credible outside enforcement. In addition to providing financial assurance to our organization, a Social Security Number provides financial security to the residents and their guarantors. Given that The Courtyards experiences a high rate of resident turnover, we often have many residents with a similar name. Since the Social Security Number is the most unique identifier of an individual, it ensures that the account being sent to collections matches the person who owes the funds.

What documents require a Social Security Number?

- Student's Social Security Number is required only on the front page of the Lease.
- Guarantor's Social Security Number is required only on the Continuing Guarantor of Lease form.

Who has access?

Only management and staff have access to Social Security Numbers. All staff members must pass a background check prior to employment.

How do we secure documents?

Social Security Numbers are never stored electronically. Documents containing Social Security Numbers are stored in locked file cabinets to which only management and staff have access. The filing cabinets are located in our office, which is secured with a monitored alarm system.

What happens when the Lease ends?

After a resident who is clear of any balance has moved out and his/her lease has ended, Social Security Numbers on the Continuing Guarantor of Lease and the resident's Lease are blacked out. If the resident owes The Courtyards funds, their file continues to be securely held in the office. Once their balance is paid off, the Social Security Numbers on the Continuing Guarantor of Lease and the resident's Lease are blacked out. If the balance remains unpaid, the Social Security Numbers on the Continuing Guarantor of Lease and the resident's Lease are blacked out after the account is sent to our collection agency.

Annually, past resident files are digitally archived by an outside contractor, saved to DVD, and the hardcopies are destroyed. Archiving is completed for a full lease year. A lease year is only archived once we ensure that all accounts are either settled or in collections and all Social Security Numbers are blacked out.

Is there an alternative to providing Social Security Numbers on the documents?

The Guarantor has two alternatives to providing his/her Social Security Number on the Continuing Guarantor of Lease form.

- 1.) The full base rent of the lease may be paid in certified funds (certified check or money order) at the time of the lease signing. Since the Guarantor's role is primarily to ensure financial obligations are met for the lease, certified payment in-full satisfies the primary financial responsibility for the lease.
- 2.) Prior to the lease signing, the student can request a credit and income verification. In this instance, a credit check would be completed on the potential resident (not his/her Guarantor) and the student would be required to provide proof of income showing his/her ability to pay the rent installments. A request for the credit check must be submitted to the Leasing Agent via e-mail at office@umdcourtyards.com and a \$25 fee for the credit check must be paid in certified funds (certified check or money order) 14 days prior to the leasing appointment.

The student, as the lease holder, does not have an alternative to providing his/her Social Security Number on the front page of the lease.