UCPPD Review
Process Document

Background
The University Committee for the Protection of Personal Data (UCPPD) must approve the access, use, or disclosure of Social Security Numbers (SSNs) or partial SSNs to ensure that legal, regulatory, and policy requirements are met. This applies to both vendor access and access within the University. The committee will also review the use of other Personal Identifying Information (PII) upon request or at the committee’s discretion.

The committee does not evaluate the level of security risk for requests but relies on the Information Security Office risk assessment and data steward(s) risk acceptance as inputs for the committee decision.

The process to request a UCPPD review is outlined below.

Determine if UCPPD Approval is Required
Does the project involve the access, use, or disclosure of SSNs (four or more digits)?

- If no, UCPPD approval is not required.
- If yes, UCPPD approval is required. The next section explains what information the committee needs to review the request.

Contact privacy@unc.edu if there are questions about whether UCPPD approval is required.

Submit a Request*
1. The requestor must collect the required documentation:
   a. Brief description of the engagement or project.
   b. A copy or screenshot of the form being used to collect SSN.
   c. Date approval is sought and why.
   d. All applicable data steward approvals, PDF copies of email are sufficient.
   e. Security Risk Assessment, see the Risk Assessment Program FAQ for additional information.
2. Submit the packet via email to privacy@unc.edu.
3. The Privacy Office will review the request for completeness and contact the requestor with the meeting date for committee review. Additional information may be required before committee review.
   a. Requests must be submitted at least 10 business days before a committee meeting to be considered, as the schedule allows, for that month’s agenda. The meeting schedule and deadlines for submission are available on the UCPPD website.
   b. The business owner (which may be a different than the requestor) must attend the committee meeting to discuss the request. While not required or recommended, if absolutely necessary, up to two (2) additional members of the business unit may attend to support the submission to the committee. No vendors or salespersons are allowed in this meeting.
Committee Review*

1. Each business owner will have 15 minutes with the committee. The business owner will give a five-minute (maximum) overview of the request and then the committee will ask questions.
2. The business owner will leave the meeting and the committee will discuss the request and vote on approval.
3. The Privacy Office will contact the requestor within five business days with the committee decision. The committee may decide that additional information is required. In that case, the requestor will be asked to submit the additional information and potentially return to present at the next meeting.
4. If the additional information is not supplied within 30 days, the request will be closed without approval. Upon reasonable request, additional time may be granted by the committee.

Process Overview

Determine if UCPPD Approval is Required → Submit Request → Schedule Review → Attend Committee Meeting → Make & Share Decision

Key:
- Requestor responsibilities
- UCPPD responsibilities