

Planning for the Elimination of Social Security Numbers (SSNs) as Primary Identifiers

Federal and state law requires the collection of your Social Security number (SSN) for certain purposes (e.g., IRS reporting forms). However, widespread use of an individual's SSN is a major privacy concern. With incidents of identity theft increasing, steps to secure an individual's SSN become more important.

A large number of colleges and universities use Social Security numbers (SSNs) as primary identifiers for faculty, staff, and students, which exposes institutions to risk because of changing legal and security environments. Therefore, many institutions are planning for the migration away from SSN use as a primary identifier. Undertaking such a task raises issues, challenges, and opportunities for any institution.

EDUCAUSE has identified resources concerning the elimination of Social Security Numbers (SSNs) as primary identifiers that may be useful to the higher education community. Many of these resources have been contributed by EDUCAUSE members. If you would like to include additional resources on this page, send the information to contribute@educause.edu.

Federal Government Resources

Electronic Communications Privacy Act (ECPA) of 1986 <link to: http://www.gsa.gov/attachments/GSA_PUBLICATIONS/extpub/5.pdf>
Public Law 99-508, passed by the 99th Congress.

Family Educational Rights & Privacy Act (FERPA), 20 U.S.C. § 1232g; 34 CFR Part 99 <link to: <http://www.ed.gov/policy/gen/reg/ferpa/index.html>>
FERPA is a Federal law that protects the privacy of student education records. This Department of Education page describes how the regulations apply to educational agencies or institutions.

Federal Trade Commission (FTC) Identity Theft Resource Page <link to: <http://www.consumer.gov/idtheft/>>
The FTC has developed this site as a national resource for Identity Theft. It provides a list of steps to take for individuals who believe that their identity has been stolen. Resources include an Identity Theft survey, affidavit, statistics, and other helpful links.

Gramm-Leach-Bliley Act (GLB Act) of 1999 <link to: <http://www.senate.gov/~banking/conf/confprt.htm>>
Public Law 106-102, passed by the 106th Congress.

Health Insurance Portability and Accountability Act (HIPAA) of 1996 <link to: <http://aspe.hhs.gov/admsimp/pl104191.htm>>
Public Law 104-191, passed by the 104th Congress.

The Privacy Act of 1974, 5 U.S.C. § 552a, (As Amended) <link to: <http://www.usdoj.gov/04foia/privstat.htm>>

The Privacy Act of 1974, as amended, states that “It shall be unlawful for any Federal, State or local government agency to deny to any individual any right, benefit, or privilege provided by law because of such individual's refusal to disclose his social security account number.”

Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 (USA PATRIOT Act or USAPA) <link to:

<http://www.epic.org/privacy/terrorism/usapatriot/>>

The USA PATRIOT Act made significant amendments to over 15 statutes, including FERPA and ECPA. The Electronic Privacy Information Center (EPIC) site provides an introduction and overview of the act, as well as a history and other resources.

State Government Resources

Arizona State Law, A.R.S. §15-1823, Effective 6/30/02 <link to:

<http://www.azleg.state.az.us/FormatDocument.asp?inDoc=/ars/15/01823.htm&Title=15&DocType=ARS>>

Arizona State Law, A.R.S. § 44-1376, Effective 1/1/05 <link to:

<http://www.azleg.state.az.us/FormatDocument.asp?inDoc=/legtext/46leg/1R/laws/0137.htm>>

California Department of Consumer Affairs: “Your SSN: Controlling the Key to Identity Theft” <link to: <http://www.privacy.ca.gov/sheets/cis4english.htm>>

California State Law, SB 1386 (Chaptered), Effective 7/1/03 <link to:

http://info.sen.ca.gov/pub/01-02/bill/sen/sb_1351-1400/sb_1386_bill_20020926_chaptered.html>

Maryland State Law, SB199, Amending Article § 10-624, Effective 10/1/00 <link to:

http://mlis.state.md.us/cgi-win/web_statutes.exe?gsg&10-624>

Maryland State Law, SB199, Amending Article § 10-633, Effective 10/1/00 <link to:

http://mlis.state.md.us/cgi-win/web_statutes.exe?gsg&10-633>

Maryland State Law, HB37, Article § 15-110, Effective 7/1/01 <link to:

http://mlis.state.md.us/cgi-win/web_statutes.exe?ged&15-110>

Rhode Island Public Law, Title 16 § 16-38-5.1, Effective 7/18/01 <link to:

<http://www.rilin.state.ri.us/PublicLaws/law01/law01411.htm>>

Association and Non-governmental Organization Resources

Center for Democracy and Technology Privacy Legislation Chart <link to:

<http://www.cdt.org/legislation/108th/privacy/>>

This chart shows current legislation affecting Social Security Number privacy and identity theft.

EPIC (Electronic Privacy Information Center) SSN Resource Page <link to: <http://www.epic.org/privacy/ssn/>>

This site offers information on hot topics, controversies, and court cases regarding privacy and Social Security Numbers.

Identity Theft Resource Center (ITRC) <link to: <http://www.idtheftcenter.org/index.shtml>>

ITRC is a national organization dedicated to helping people to prevent and recover from identity theft. Resources include FAQs, scams and consumer alerts, and current laws.

Privacy Rights Clearinghouse Identity Theft Resources <link to: <http://www.privacyrights.org/identity.htm>>

This site provides links to identity theft fact sheets, publications, and other informational sites.

Privacy Rights Clearinghouse SSN Fact Sheet <link to: <http://www.privacyrights.org/fs/fs10-ssn.htm>>

“Your Social Security Number: How Secure Is It?” is a fact sheet that provides an information resource for consumers nationwide. The organization notes that this page should not be used as legal advice.

Institutions Planning for the Elimination of Social Security Numbers (SSNs) as Primary Identifiers

- Arizona State University Office of General Counsel Legal Information: Social Security Numbers <link to: <http://www.asu.edu/counsel/brief/socialsecurity.html>>
- Drexel University Policy for Personal ID Number <link to: <http://www.drexel.edu/IRT/policies/UniversityID.html>>
- Georgia Institute of Technology ID Number Information Page <link to: <http://www.gtids.gatech.edu>>
- Stony Brook University Policy <link to: <http://naples.cc.sunysb.edu/Prov/registrarweb.nsf/pages/studentss>>
- University of Arizona Policies and Procedures <link to: <http://info-center.ccit.arizona.edu/~policy/ssn.shtml>>
- University of California-Los Angeles (UCLA) Policy <link to: http://www.adminvc.ucla.edu/appm/public/app_0602_0.HTML>
- University of Florida Identification Numbers FAQ <link to: <http://www.it.ufl.edu/ufid/nutshell.html>>
- University of Illinois AITS (Administrative Information Technology Services) Guidelines <link to: http://www.ait.s.uillinois.edu/security/ssn_guidelines.html>
- University of Illinois SSN Policy <link to: <http://www.ssn.uillinois.edu>>
- University of Illinois at Urbana-Champaign ILSCO (Illinois Library Computer Systems Organization) SSN Masking Program <link to: http://www.ilcso.uiuc.edu/Web/Docs/SSN_suppression.html>

- University of Iowa Policy <link to:
<http://cio.uiowa.edu/Policy/FinalDraft/UniversityIDPolicyV1.3.htm>>
- University of Michigan Standard Practice Guide <link to:
<http://spg.umich.edu/pdf/601.14.pdf>>
- University of Michigan-Flint Student ID Conversion <link to:
<http://www.flint.umich.edu/notice/>>
- University of Texas-Austin Data Theft & Identity Protection Information <link to:
<https://www.utexas.edu/datatheft/ssnprivacy.html>>
- University of Washington SSN Conversion Project <link to:
<https://www.washington.edu/computing/USES/campus/neweid/>>
- Western Kentucky University SSN Protection Plan Summary <link to:
<http://www.wku.edu/Dept/Support/Tech/reports/ssnprotectsummary.pdf>>

Resources from the EDUCAUSE Information Resources Library

- Data Security <link to:
http://www.educause.edu/asp/doclib/lib_term_detail.asp?Term_ID=586&BREADCRUMB=1,101,180,586&MODE=expand>
- Gramm-Leach-Bliley Act (GLB Act) <link to:
http://www.educause.edu/asp/doclib/lib_term_detail.asp?Term_ID=673&BREADCRUMB=1,104,640,673&MODE=expand>
- Gramm-Leach-Bliley Act (GLB Act) Current Issues page <link to:
<http://www.educause.edu/issues/issue.asp?issue=glb>>
- Health Insurance Portability and Accountability Act of 1996 (HIPAA) Current Issues page <link to:
<http://www.educause.edu/issues/issue.asp?issue=hipaa>>
- IT Security for Higher Education: A Legal Perspective <link to:
<http://www.educause.edu/ir/library/pdf/CSD2746.pdf>>
- Legislation Tracking Chart: 108th Congress <link to:
<http://www.educause.edu/ir/library/excel/net0015a.xls>>
- Privacy <link to:
http://www.educause.edu/asp/doclib/lib_term_detail.asp?TERM_ID=188&BREADCRUMB=1,101,180,188&MODE=expand>