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**OFFICE OF  
THE INSPECTOR GENERAL**

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**SOCIAL SECURITY ADMINISTRATION**

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**KINDERGARTEN THROUGH 12<sup>TH</sup> GRADE  
SCHOOLS' COLLECTION AND USE  
OF SOCIAL SECURITY NUMBERS**

July 2010

A-08-10-11057

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**AUDIT REPORT**

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## Mission

By conducting independent and objective audits, evaluations and investigations, we inspire public confidence in the integrity and security of SSA's programs and operations and protect them against fraud, waste and abuse. We provide timely, useful and reliable information and advice to Administration officials, Congress and the public.

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The Inspector General Act created independent audit and investigative units, called the Office of Inspector General (OIG). The mission of the OIG, as spelled out in the Act, is to:

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- Review and make recommendations regarding existing and proposed legislation and regulations relating to agency programs and operations.
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## SOCIAL SECURITY

### MEMORANDUM

Date: July 22, 2010

Refer To:

To: The Commissioner

From: Inspector General

Subject: Kindergarten Through 12<sup>th</sup> Grade Schools' Collection and Use of Social Security Numbers (A-08-10-11057)

### OBJECTIVE

Our objective was to assess kindergarten through 12<sup>th</sup> grade (K-12) schools' collection and use of Social Security numbers (SSN) and the potential risks associated with current practices.

### BACKGROUND

Millions of children enroll in K-12 schools each year. To assist in this process, K-12 schools may collect and use SSNs for various purposes. Although no single Federal law regulates overall use and disclosure of SSNs by K-12 schools, the *Privacy Act of 1974*, *Social Security Act*, and *Family Educational Rights and Privacy Act of 1974* (FERPA), contain provisions that govern disclosure and use of SSNs. See Appendix B for more information on the specific provisions of these laws. Additionally, the Office of Management and Budget (OMB) issued a memorandum in 2007 on safeguarding against and responding to disclosure of personally identifiable information, including SSNs.<sup>1</sup> Federal agencies are required to reduce the volume of collected and retained personally identifiable information to the minimum necessary,<sup>2</sup> including establishment and implementation of plans to eliminate unnecessary collection and use of SSNs.<sup>3</sup>

We reviewed relevant State laws, policies, and practices regarding K-12 schools' collection and use of SSNs. We also contacted selected State educational agencies to identify steps States have taken to limit K-12 schools' collection and use of SSNs. In

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<sup>1</sup> OMB, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information* (M-07-16), May 22, 2007.

<sup>2</sup> *Id.* at 2.

<sup>3</sup> *Id.* at Attachment 1, § B.2.a.

addition, we identified incidents in which K-12 schools inadvertently and/or improperly disclosed students' SSNs. See Appendix C for additional details regarding the scope and methodology of our review.

## **RESULTS OF REVIEW**

Despite the increasing threat of identity theft, our review of State laws and school policies and practices disclosed that K-12 schools' collection and use of SSNs was widespread.<sup>4</sup> We determined that many K-12 schools used SSNs as the primary student identifier or for other purposes, even when another identifier would have sufficed. In addition, there has been a growing trend among State Departments of Education to establish longitudinal databases, which may include SSNs, of K-12 children in a State to track students' progress over time. While some State laws may require that K-12 schools collect SSNs in some instances, we believe some do so as a matter of convenience—because SSNs are unique identifiers and most students have an SSN. However, we do not believe administrative convenience should ever be more important than safeguarding children's personal information.

We believe the unnecessary collection and use of SSNs is a significant vulnerability for this young population.<sup>5</sup> Recent data indicate the number of children under age 19 whose identities have been stolen is growing. This is particularly troubling given that some of these students may not become aware of such activity until they apply for a credit card or student loan. Because of the numerous incidences of identity theft and the recognition that SSNs are linked to vast amounts of personal information, some States have taken steps to limit the collection and use of SSNs. We are encouraged by these efforts and believe that State and local educational systems should seek additional ways to limit their collection and use of SSNs and implement stringent controls to protect SSNs when collected.

### **K-12 SCHOOLS' COLLECTION AND USE OF SSNs**

We determined that many K-12 schools used SSNs as primary student identifiers to help in recordkeeping and tracking students throughout their school years. For example, we identified laws in 7 States<sup>6</sup> that required that K-12 schools obtain students'

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<sup>4</sup> This issue was first discussed in a prior SSA OIG audit, *State and Local Governments' Collection and Use of Social Security Numbers* (A-08-07-17086), September 2007.

<sup>5</sup> For the 2009/2010 school year, the National Education Association (NEA) estimated there were more than 49 million K-12 students in over 15,000 school districts nationwide. See NEA, *Rankings & Estimates: Rankings of the States 2009 and Estimates of School Statistics 2010*, December 2009.

<sup>6</sup> The States were Alabama, Arkansas, Florida, Georgia, Kentucky, Virginia, and West Virginia. Although these States require an SSN for enrollment, they also may provide alternative numbers for individuals who refuse to provide their SSN or who are not eligible for an SSN.

SSNs and schools in at least 26 other States<sup>7</sup> that collected students' SSNs at registration, even though no State law required that they do so.<sup>8</sup> We also identified K-12 schools that included students' SSNs on such documents as enrollment applications, student profiles, graduation forms, transcripts, tests, athletic participation forms, and educational research data. In addition, we identified an elementary school poster contest in which students' SSNs were requested on entry forms attached to the back of posters.<sup>9</sup> We believe such practices increase the risk of SSN misuse and unnecessarily subject students to the possibility of identity theft.

In addition to K-12 schools' collection and use of SSNs, there is a growing trend among State Departments of Education to establish longitudinal databases of all K-12 children within a State to track students' progress over time, according to a recent university study.<sup>10</sup> The study found that privacy protections for these databases were generally lacking in the majority of States. Furthermore, the study reported that at least 32 percent of States warehoused children's SSNs, and over 80 percent of States apparently failed to have data retention policies and were likely to hold student information indefinitely. In addition, several States outsourced the data-warehousing function without any protections for privacy in vendor contracts. While we recognize there are some legitimate reasons for data collection in K-12 educational systems (for example, tracking school improvement), we question the need for States to collect SSNs, especially when States also assign a unique identification number to students in these databases. Until States stop collecting SSNs and redact existing SSNs, we encourage States to implement stringent security measures when establishing such databases.

The coordinator of the Statewide Longitudinal Data Systems Grant Program<sup>11</sup> told us the U.S. Department of Education does not instruct States to collect SSNs when establishing longitudinal databases. Although 28 (56 percent) States collect SSNs, he agreed they may not need to continue this practice because all States now assign a unique identification number to students in these databases. According to the grant program coordinator, the primary reason some States collect K-12 students' SSNs is to allow States to track students as they move to post-secondary education systems and enter the workforce. While he acknowledged that privacy protections may vary among

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<sup>7</sup> The States were Connecticut, Delaware, Hawaii, Illinois, Iowa, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Mississippi, Missouri, Nebraska, Nevada, New Hampshire, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin, and Wyoming.

<sup>8</sup> We do not suggest that these are the only States in which K-12 schools collect SSNs at registration.

<sup>9</sup> Although instructions state that SSNs may be redacted on the copy of the entry form affixed to the back of the poster, we question the need to obtain such information before award and prize selection.

<sup>10</sup> Joel R. Reidenberg et al., Fordham Law School Center on Law and Information Policy, *Children's Educational Records and Privacy*, October 2009.

<sup>11</sup> This U.S. Department of Education grant program is designed to aid State education agencies in developing and implementing longitudinal data systems to enhance the ability of States to efficiently and accurately manage, analyze, and use education data, including individual student records.

States, he believes that most States understand the importance of having safeguards in place to protect personally identifiable information and are working to do so.

### **POTENTIAL RISKS ASSOCIATED WITH COLLECTING AND USING SSNs**

K-12 schools' collection and use of SSNs entail certain risks. Each time a student provides his/her SSN, the potential for a dishonest individual to unlawfully gain access to, and misuse, the SSN increases. Identity thieves often target children because they have clean credit histories, and their records may be used for years before they realize their identity has been used for criminal activities. Since 2005, 40 school-related breaches of children's personally identifiable information (including SSNs) have been reported.<sup>12</sup> Because many K-12 schools still use SSNs as the primary student identifier, students' exposure to such activity remains. We believe the following examples illustrate K-12 students' risk of exposure to identity theft and fraud.

- In March 2009, 8 individuals were indicted and arrested for breaking into about 50 public schools in Puerto Rico and stealing personal identification documents (including SSN cards) from as many as 12,000 students, teachers, and school administrators. The documents were stolen for sale to illegal immigrants interested in using the identities of U.S. citizens. The documents were sold as sets (SSN cards and birth certificates), originals or copies, starting at \$150 or \$40, respectively.
- In December 2009, a North Carolina school system accidentally sent out about 5,000 postcards with students' SSNs printed on the front.
- In September 2009, 15 boxes containing hundreds of students' confidential records (including birth certificates and SSN cards) were dumped on the sidewalk in front of their former New York high school.
- In October 2008, more than 400 identification cards were recalled from a Maryland high school when officials realized that student SSNs had been printed on some of them, even though the school system assigned students distinct identification numbers. The school system also appears to use SSNs in student lunch codes.
- In November 2009, documents from a Texas school district's lunch program for 2003 to 2006 were left at a television news station with a note attached claiming the documents were found at a recycling center. Students' SSNs were visible on the documents.

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<sup>12</sup> As of December 2008, only 44 States required notification of security breaches involving personal information. As such, all breaches may not have been reported.

## **SOME STATES HAVE TAKEN STEPS TO LIMIT SSN COLLECTION AND USE**

The increase in identity theft and the recognition that SSNs are linked to vast amounts of personally identifiable information have led some States to limit SSN collection and use in K-12 schools.<sup>13</sup> We identified four States that had enacted laws to prohibit K-12 schools or State educational agencies from using SSNs as primary student identifiers.<sup>14</sup> In addition, we identified four other States that had policies and practices that restricted the collection and/or use of SSNs in K-12 schools.<sup>15</sup> Education officials in these States confirmed that there was no need to use SSNs as student identifiers when other unique identifiers were sufficient to track K-12 students. The following examples illustrate some of the steps States have taken to limit SSN collection and use in K-12 schools.

- No public educational institution in Rhode Island, including the State Department of Elementary and Secondary Education, may assign an individual identification number to a student that is identical to, or incorporates, the individual's SSN. In addition, no public educational institution may allow the public display of a student's SSN or any four or more consecutive numbers contained in the individual's SSN for any purpose.
- While a school board or governing body of a private school may assign a unique identification number to each K-12 student in Wisconsin, they may not assign a number that is identical to, or incorporates, the student's SSN. The identification number is intended to travel with the student throughout his/her academic career and is used for all required State reporting. This eliminates the need for school districts to use SSNs as student identifiers in their computer systems.
- Nebraska does not have a law that prohibits SSNs as student identifiers. However, school districts do not use SSNs as such because the Nebraska Department of Education assigns a Student ID, which is a 10-digit, randomly assigned number. Furthermore, Nebraska does not store SSNs in its data warehouse. An education official told us SSNs are not a universally used identifier for school purposes because it is too much trouble to protect the SSN at the State level.
- While there is no law in North Dakota prohibiting the use of SSNs as student identifiers, the Department of Public Instruction avoids using SSNs as student identifiers because of sensitivity issues. An education official told us the unique student identifier it uses sufficiently tracks students through the K-12 system, thus eliminating the need to use SSNs.

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<sup>13</sup> We do not intend to suggest that the States discussed below are the only States that have taken steps to limit SSN collection and use in K-12 schools.

<sup>14</sup> The States were New Hampshire, Ohio, Rhode Island, and Wisconsin. However, such laws may not prevent K-12 schools from collecting and using SSNs for other purposes.

<sup>15</sup> The States were Nebraska, North Dakota, Washington, and Wyoming.

In previous audits,<sup>16</sup> we identified instances in which colleges and universities used SSNs as the primary student identifier or for other purposes. However, numerous incidences of identity theft led some schools to reconsider the practice. In addition, some States enacted laws to regulate college and university use of SSNs. We are encouraged by those efforts and believe that State and local governments should afford the same protections to students in K-12 schools.

## CONCLUSION AND RECOMMENDATIONS

Despite the potential risks associated with using SSNs as primary student identifiers, many K-12 schools continue this practice. While we recognize that SSA cannot prohibit States or K-12 schools from collecting and using SSNs as student identifiers or for other purposes, we believe SSA can help reduce the threat of identity theft and SSN misuse by encouraging States and K-12 schools to reduce unnecessary collection of SSNs and improve protections and safeguards when collected. We recommend that SSA:

1. Coordinate with State Departments of Education and K-12 school systems to inform the education community about the potential risks associated with using SSNs as student identifiers or for other purposes.
2. Encourage State Departments of Education and K-12 schools to reduce unnecessary collection and use of SSNs and implement stringent safeguards to protect SSNs when collected.
3. Promote the best practices of States and K-12 schools that have taken steps to limit SSN collection and use.

## AGENCY COMMENTS AND OIG RESPONSE

SSA agreed with our recommendations. The Agency's comments are included in Appendix D.



Patrick P. O'Carroll, Jr.

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<sup>16</sup> SSA OIG, *Universities' Use of Social Security Numbers as Student Identifiers in Regions IV and X* (A-08-05-15034 and A-08-05-15033), December 2004 and March 2005, respectively.

# *Appendices*

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[APPENDIX A](#) – Acronyms

[APPENDIX B](#) – Federal Laws That Govern Disclosure and Use of the  
Social Security Number

[APPENDIX C](#) – Scope and Methodology

[APPENDIX D](#) – Agency Comments

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### Acronyms

|             |  |
|-------------|--|
| C.F.R.      | Code of Federal Regulations                              |
| FERPA       | <i>Family Educational Rights and Privacy Act of 1974</i> |
| K-12        | Kindergarten Through 12 <sup>th</sup> Grade              |
| NEA         | National Education Association                           |
| OIG         | Office of the Inspector General                          |
| OMB         | Office of Management and Budget                          |
| Pub. L. No. | Public Law Number  |
| SSA         | Social Security Administration                           |
| SSN         | Social Security Number                                   |
| U.S.C.      | United States Code                                       |

# Federal Laws That Govern Disclosure and Use of the Social Security Number

The following Federal laws establish a general framework for disclosing and using the Social Security number (SSN).

### *The Privacy Act of 1974*<sup>1</sup>

The *Privacy Act of 1974* (the *Privacy Act*) indicates, in part, that it is unlawful for any Federal, State, or local government agency to deny any individual any right, benefit, or privilege provided by law because of such individual's refusal to disclose his/her SSN, unless the disclosure is required by Federal statute or is to any Federal, State, or local agency maintaining a system of records in existence and operating before January 1, 1975, such disclosure was required under statute or regulation adopted before such date to verify the identity of an individual.<sup>2</sup> Further, under Section 7(b) of the *Privacy Act*,<sup>3</sup> any Federal, State, or local government agency requesting that an individual disclose his/her SSN must inform the individual whether the disclosure is voluntary or mandatory, by what statutory or other authority the SSN is solicited and what uses will be made of the SSN.

### *The Social Security Act*

The *Social Security Act* provides, in part, that "Social security account numbers and related records that are obtained or maintained by authorized persons pursuant to any provision of law enacted on or after October 1, 1990, shall be confidential, and no authorized person shall disclose any such social security account number or related record."<sup>4</sup> The *Social Security Act* also provides, in part, that ". . . [w]hoever discloses, uses, or compels the disclosure of the social security number of any person in violation of the laws of the United States; shall be guilty of a felony...."<sup>5</sup> The *Social Security Act* authorized certain State and local agencies to use the SSN for certain purposes and allows, or in certain instances requires, such agencies to require individuals to furnish their SSNs for such purposes.<sup>6</sup>

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<sup>1</sup> Pub. L. No. 93-579, 5 U.S.C. 522a.

<sup>2</sup> Pub. L. No. 93-579 § 7(a), 5 U.S.C. 552a, note (Disclosure of social security number).

<sup>3</sup> *Id.*

<sup>4</sup> 42 U.S.C. § 405(c)(2)(C)(viii).

<sup>5</sup> 42 U.S.C. § 408(a)(8).

<sup>6</sup> 42 U.S.C. § 405(c)(2)(C)(i), (ii), (v), (vi), (D), and (E).

## *The Family Educational Rights and Privacy Act of 1974*<sup>7</sup>

The *Family Educational Rights and Privacy Act of 1974* (FERPA) protects the privacy of student education records. FERPA applies to those schools that receive funds under an applicable program of the U.S. Department of Education.<sup>8</sup> Under FERPA, an educational institution must have written permission from the parent or eligible student to release any personally identifiable information (which includes SSNs) from a student's education record.<sup>9</sup> FERPA does, however, provide certain exceptions in which a school is allowed to disclose records without consent.<sup>10</sup> These exceptions include disclosure without consent to: other school officials who have a legitimate educational interest in the information, officials of institutions where the student is seeking to enroll/transfer, parties to whom the student is applying for financial aid, the parent of a dependent student, appropriate parties in compliance with a judicial order or lawfully issued subpoena, or health care providers in the event of a health or safety emergency.<sup>11</sup>

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<sup>7</sup> 20 U.S.C. § 1232g.

<sup>8</sup> 34 C.F.R. § 99.1(a)(2000).

<sup>9</sup> 20 U.S.C. § 1232g(b). FERPA gives parents certain rights with respect to their children's education records. 34 C.F.R. § 99.10(a). These rights transfer to the child when the child reaches the age of 18 or attends an institution of postsecondary education. 20 U.S.C. § 1232g(d). Children who have been transferred rights are referred to as "eligible students." 34 C.F.R. § 99.5(a).

<sup>10</sup> 20 U.S.C. § 1232g(b)(1).

<sup>11</sup> *Id.*

# Scope and Methodology

To accomplish our objective, we:

- Reviewed relevant laws from all 50 States regarding kindergarten through 12<sup>th</sup> (K-12) schools' use of Social Security numbers (SSN).
- Reviewed Internet Websites of K-12 State educational agencies. We also selected and reviewed a sample of local K-12 school system Websites because of the large number of such entities.
- Researched child identity theft and occurrences of school-related SSN exposure using Internet search engines.
- Discussed development of the Statewide Longitudinal Data Systems Grant Program with the U.S. Department of Education.
- Reviewed selected studies and articles regarding K-12 schools' collection and use of SSNs.
- Contacted selected State educational agencies to determine policies and practices regarding K-12 schools' collection and use of SSNs.

Our review of internal controls was limited to gaining an understanding of the collection and use of SSNs by K-12 schools. The Social Security Administration entity reviewed was the Office of the Deputy Commissioner for Operations. We conducted our audit from November 2009 through April 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

## Agency Comments



## SOCIAL SECURITY

### MEMORANDUM

**Date:** July 16, 2010 **Refer To:** S1J-3

**To:** Patrick P. O'Carroll, Jr.  
Inspector General

**From:** James A. Winn /s/  
Executive Counselor to the Commissioner

**Subject:** Office of the Inspector General (OIG) Draft Report, "Kindergarten Through 12th Grade Schools' Collection and Use of Social Security Numbers" (A-08-10-11057)--INFORMATION

Thank you for the opportunity to review and comment on the draft report. We appreciate OIG's efforts in conducting this review. Attached is our response to the report findings and recommendations.

Please let me know if we can be of further assistance. Please direct staff inquiries to Candace Skurnik, Director, Audit Management and Liaison Staff, at extension 54636.

Attachment:  
SSA Response

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT, "KINDERGARTEN THROUGH 12TH GRADE SCHOOLS' COLLECTION AND USE OF SOCIAL SECURITY NUMBERS (SSN)" (A-08-10-11057)**

We agree there are many risks associated with schools using SSNs as primary identifiers. We appreciate your acknowledging that we cannot prohibit the practice. Nevertheless, we do actively discourage use of SSNs. We describe some of our efforts for doing so in our response below.

**Recommendation 1**

Coordinate with State Departments of Education and K-12 school systems to inform the education community about the potential risks associated with using SSNs as student identifiers or for other purposes.

Response

We agree. Our website Social Security.gov already provides publications, policy, frequently asked questions (FAQ), and best practices for protecting SSNs. More information is available in these links:

<http://www.socialsecurity.gov/pubs/10002.html#protect>  
<http://www.socialsecurity.gov/phila/ProtectingSSNs.htm>  
[http://www.socialsecurity.gov/kc/id\\_practices\\_best.htm](http://www.socialsecurity.gov/kc/id_practices_best.htm)  
<https://secure.ssa.gov/apps10/poms.nsf/lnx/0100201070>  
[http://ssa-custhelp.ssa.gov/app/answers/detail/a\\_id/1122/kw/protect%20ssn](http://ssa-custhelp.ssa.gov/app/answers/detail/a_id/1122/kw/protect%20ssn)  
[http://ssa-custhelp.ssa.gov/app/answers/detail/a\\_id/1649/kw/protect%20ssn](http://ssa-custhelp.ssa.gov/app/answers/detail/a_id/1649/kw/protect%20ssn)

In addition, in response to the September 2007 OIG Final Report, "State and Local Governments' Collection and Use of Social Security Numbers" (A-08-07-17086), we are preparing articles promoting these web pages to state and local governments as part our ongoing educational outreach efforts.

**Recommendation 2**

Encourage State Departments of Education and K-12 schools to reduce unnecessary collection and use of SSNs and implement stringent safeguards to protect SSNs when collected.

Response

We agree. See response to recommendation 1.

### **Recommendation 3**

Promote the best practices of States and K-12 schools that have taken steps to limit SSN collection and use.

#### **Response**

We agree. See response to recommendation 1.

## **OIG Contacts and Staff Acknowledgments**

### ***OIG Contacts***

Kimberly Byrd, Director, Atlanta Audit Division

Jeff Pounds, Audit Manager, Birmingham Office of Audit

### ***Acknowledgments***

In addition to those named above:

Kathy Yawn, Senior Auditor

For additional copies of this report, please visit our web site at [www.socialsecurity.gov/oig](http://www.socialsecurity.gov/oig) or contact the Office of the Inspector General's Public Affairs Staff Assistant at (410) 965-4518. Refer to Common Identification Number A-08-10-11057.

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