Office of Information Technology / Social Security Number Disclosure Statement

Does Rutgers University - Office of Information Technology (OIT) ask for Social Security numbers (SSNs)?

Currently, the Office of Information Technology does ask for SSNs for identification purposes during the account creation process. The SSNs are used to compare with existing information on record as collected by the admissions process for students and employees.

Why does the university use SSNs for this purpose?

Because SSNs are currently the only unique identifier the university has to establish authentication of an individual.

Is this practice legal?

Yes, universities are legally allowed to ask for SSNs for identification/authentication purposes.

Aren't there privacy laws protecting SSNs?

Yes, there is the Family Educational Rights and Privacy or FERPA. You can read the FERPA text <u>here</u>. One of FERPA's provisions requires written consent for the release of "educational records" or personally identifiable information, with some exceptions. The courts have stated that SSNs fall within this provision.

Public schools, colleges, and universities that ask for SSNs fall also within the provisions of another federal law, the Privacy Act of 1974. This act requires such schools to provide a disclosure statement telling students how the SSN is used. The text of the Privacy Act can be read here.

There is also an act concerning display of certain students' social security numbers and supplementing Title18A of the New Jersey Statutes. It states that no public or independent institution of higher education in the State shall display any student's social security number to identify that student for posting or public listing of grades, on class rosters or other lists provided to teachers, on student identification cards, in student directories or similar listings, unless otherwise required in accordance with applicable State or federal law.

Is Rutgers University - Office of Information Technology compliant with these laws?

Yes, Rutgers University - Office of Information Technology is in compliance with these laws.

Does Rutgers University have a policy on SSNs?

Yes, Rutgers <u>policy 50.3.9</u>, the Identity Theft Compliance Policy, was developed in response to the <u>New Jersey Identity Theft Prevention Act, N.J.S.A. 56:8-161 through 56:8-166</u>. It has a section titled; Requirements for Collecting, Retaining, and Restricting Access to Personal Information. Under this section, SSNs are among the list of personal information covered by the policy. Detailed guidelines specify what is and is not allowed regarding the use of SSNs at the University.

Are there any plans by Rutgers University - Office of Information Technology to move away from asking for SSNs as part of the NetID activation/account creation process?

Yes, there has been a project underway for several years to plan for the replacement of SSNs with a different unique identifier. This project has a very large scope as it involves many of the central business systems of the institution. Details of the Identity Management Project can be viewed at the <u>website</u>.

However, SSNs will still be required by the University for the admissions process, for payroll purposes and for financial aid processing.

When will the use of SSNs be replaced?

The target for the Identity Management Project initial rollout is the spring of 2012. At that time, SSNs will be replaced with individual activation keys for the account creation process.

What security measures are in place to safeguard SSN data?

The university is keenly aware of the sensitivity of SSN data and takes security of that data very seriously. There are several layers of security measures in place to ensure the safety and integrity of the SSN data.

Where can I call if I have questions?

If you have questions or need further assistance, please contact your local campus Help Desk

Camden 856/225-6274 http://computing.camden.rutgers.edu/about-us

Newark 973/353-5083 http://ncs.rutgers.edu/helpdesk

New Brunswick 732/445-HELP(4357) http://nbcs.rutgers.edu/helpdesk