PURDUE
UNIVERSITY

COLLEGE OF EDUCATION

Office of the Dean

TO: College of Education Faculty, Staff, and Graduate Staff

FROM: Kevin Kelly, Interim Dean

DATE: May 27, 2008

SUBJECT: Removal of Social Security Numbers from Departmental Servers

Purdue University began the process of discontinuing use of the *Social Security Number (SSN)* as a general identifier for Faculty/Staff/Students in August 2004. At that time Purdue began transitioning to use of the *Purdue University Identification Number (PUID)*. This effort is documented in the Purdue SSN Policy which can be found here:

http://www.purdue.edu/policies/pages/information_technology/v_5_1.html

This policy states that:

> Purdue University will assign a Purdue University Identifier (PUID) … to an individual upon initial association with the University for identification and authentication, *in order to eliminate the use of the SSN wherever possible*.

It is expected that SSNs will be used only for established and approved University business processes. Use or retention of SSNs by individuals, offices, or departments must be documented and approved using the Purdue SSN Policy Exception Form:

http://www.purdue.edu/policies/pages/information_technology/ITSPForm500.doc

Because general Purdue *student data* and *business processes* no longer use SSN, legacy documents that contain SSNs such as old *absence* forms, *travel* forms, and *course rosters* should not be retained or archived. Unapproved retention of documents containing SSNs is considered a breach of Purdue policy.

In addition to Purdue policy, there are network security reasons for removing SSNs from departmental servers. If a server or workstation that contains (or has access to) SSNs is compromised, a series of events must be triggered including notification of: (a) each person whose SSN was compromised, (b) the Indiana Attorney General of the compromise, and (c) the news media. For more on the Indiana SSN privacy law see:

http://www.in.gov/legislative/ic/code/title4/ar1/ch10.html

A recent scan of College of Education (COE) departmental file servers shows that we are retaining a significant number of files containing SSNs:

> EDCI server - 882 files belonging to 25 unique users containing one or more SSNs
> EDST server - 1107 files belonging to 24 unique users containing one or more SSNs

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The purpose of this memo is to announce that the COE will be immediately removing all files containing SSNs from the two departmental servers. The Education Office of Information Technology will archive these files, remove them from the servers, and give them to their respective owners on CDROM disc. This step will ensure that the files are readily accessible to their owners, but will no longer reside on a networked device where they can be compromised.

If you are one of the users who receive a CDROM, please determine if (a) you need to retain the files *and* complete an SSN Policy Exception Form, or (b) if the files should be destroyed. There should be no business case for retaining files that contain SSNs unless an SSN Policy Exception Form has been filed with the ITaP security group.

Although this action will address SSNs on departmental servers, it does not address the possibility that each of you may have SSNs on your workstations. Please remember that you are responsible for locating and removing SSNs from personal documents that reside on your workstation. The Education IT team is available to consult with you if you need advice for how to proceed.

Thank you for your understanding and cooperation as we address this important issue.