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# UA8 SSN Protection Committee Recommendations

WKU Information Technology

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**SSN Protection Committee**

**Recommendations**

**April 30<sup>th</sup>, 2003**

**To:       Dr. Richard Kirchmeyer  
          VP for Information Technology  
          Western Kentucky University**

## **Executive Summary.**

The WKU SSN Protection Committee was commissioned on January 30<sup>th</sup>, 2003 by the VP of Information Technology, Dr. Richard Kirchmeyer and **charged with examining the feasibility and implementation costs of reducing or eliminating the use of SSN (social security number) as the primary identifier in daily university online and offline academic, administrative and financial transactions dealing with person entities.** The rationale for such an examination is rooted in the growing national concern over identity theft and the increased awareness of and emphasis on an institution's inherent responsibility to protect the personal data of its constituents whether those data are electronic or otherwise. While the record keeping of personal data on past and present WKU constituents takes many forms across the entire WKU enterprise, this committee's primary focus was on the electronic storage and retrieval processing of personal data in the current automated computer systems and the use of SSN in such processing.

For planning purposes, the committee respectfully request a decision on the approval of this recommendation, and if approved, commitment to the requisite human and dollar resources necessary by JULY 1, 2003. See "Timeline" under recommendations.

## **Methodology.**

To formulate the recommendations below and arrive at implementation costs estimates, the committee investigated and considered the following:

1. What other schools have done/are doing to address this problem. What were the issues they encountered? What methodology did they use?
2. The different scenarios and methods that could be employed technically and functionally to reduce/eliminate the use of SSN as the primary system identifier.
3. Some of these scenarios were setup and simulated in a system test environment and reviewed by the committee.
4. The pros and cons of the various scenarios were discussed and examined at length.
5. Impact (in resources) on technical areas to implement.
6. Impact (in resources) on functional areas to implement.
7. Impact culturally on university constituency.
8. Identified the high-level tasks/components necessary to implement and attached resource estimates.
9. What is a reasonable timeline for implementation given other institutional priorities?

## Recommendations

1. Eliminate SSN as *primary key* to university computer systems. Instead, use a **Generated ID (GID)** as primary key to access university, person-related computer systems data.
2. Eliminate/reduce SSN as *primary ID* used to carry out day-to-day academic, administrative and financial transactions for employees, *admitted/registered* students and vendors. (Note: Interaction with or processing of prospective students will require use of the SSN to some degree. Also, vendors are already tracked with a Banner generated ID.)
3. Eliminate SSN from as many online and printed output media as possible. (Includes TopNet, TopSmart Online reporting and other back office reports used to process individuals).
4. Eliminate/reduce SSN from all university online and paper forms used to collect data on students and employees (except where required for federal/state regulatory interface or other institutional requirements).
5. Eliminate/reduce SSN from display in the standard search routines in Banner Forms. *SSN still works as secondary search key, but display is restricted.*
6. **TIMELINE** – The committee consensus is that SUMMER is the best time to go live with a migration to GID. Given the status of other university activities and priorities, the committee recommends SUMMER 2004 as the *earliest* possible implementation date. It will take a minimum of 6 months to implement a GID migration. This estimate assumes the project team and critical IT staff are allocated at 40% FTE time to the project. Implementation project team would be formed and operational six (6) months prior to go live date – January 2004 timeframe. If institutional resources cannot be committed for SUMMER 2004, then the project needs to be approved for SUMMER 2005.



**Implementation Assumptions** (variation from implementation assumptions could increase implementation costs)

1. GID scheme – 8xxxxxxx OR Nullxxxxxxx. (All numeric, nine digit straight sequence).
2. SSN collected and stringently maintained on Banner SPBPERS table – collection occurs in several different offices and is input from several Banner Forms.
3. SSN maintained as secondary search key to most ID centric forms. Ideally, SSN functions as search key but display of SSN is reduced or restricted in most name search result forms. The degree to which this can be accomplished will be determined at implementation time.
4. Scope – Generate GID for all entities in one-shot conversion including historical electronic records (as opposed to selected sub-populations such as *current* students and employees only)
5. TopNet – SSN NOT a search/access key in TopNet – GID required. This could be phased in to minimize impact to user population.
6. Where feasible, use GID as primary identifier for interface to auxiliary systems such as ID Card/Cbord system, Library system, CMS system (Blackboard), etc.

**Implementation Components / Resource Costs.**

<b>Component</b>	<b>FTE Costs in hours</b>	<b>Hard \$ Costs</b>
1. Project Management ( includes project manager, implementation members meeting and preparatory time)	400	
	0	
2. Technical Tasks	0	
-- Conversion programming and testing	150	
-- GID maintenance programming and testing	200	
-- TopNet Mods -- eliminate SSN display, display GID	125	
-- Modify/examine all online, batch reports and printed outputs. Display GID where appropriate.	350	
-- Modify/examine baseline processing – admission and fin aid tape/data loads, clearinghouse, SEVIS.	250	
-- Modify /examine external interfaces. (includes detail items below)	400	
a. Axis telephone system	0	
b. Cbord load – conversion required here – major work.	0	
c. ECSI/SAL interfaces	0	
d. BSR interfaces	0	
e. Blackboard – snapshots processing, other interfaces	0	
f. Lock Box processing	0	
g. Voyager Library System Patron Loading	0	
h. Third Party processing	0	
i. Bookstore interface – 1 stop bill	0	
j. ID card Center – 1 stop bill	0	
	0	
3. Functional Tasks	0	
	0	
-- Identify and reprint all affected backoffice forms and documents in user offices. (HR, Reg, Adm, FAM, Bursar, Finance, Purchasing, academic Departments).	100	
-- Train back office staff in new processing procedures and name search procedures all offices on campus.	350	
-- Train / Educate general WKU population regarding change to GID processing. Utilize arena type training, help desk, etc.	2000	2 hours average per user to retrain/get help
-- Re-issue ID cards with GID printed on it.	200	\$18,000
	0	
-- Contingency costs.	100	\$10,000
4. Logistics / Communication	0	
	0	
a. Publish change – Email notification, Herald, Website	50	
	0	
<b>Total</b>	<b>4675</b>	<b>\$28,000</b>



## Conclusions:

First, the committee's research confirmed what was already suspected. That being the pervasive and growing concern among higher education institutions (as well as private enterprise and state and federal agencies) regarding the use of SSN to identify individuals. Almost all institutions researched are converting or planning to convert automated systems to reduce the use and display of SSN. Several states have already prohibited the use of SSN as the primary identifier in government and state funded higher education systems. Others are considering such legislation. It seems prudent to have a plan and timeframe to deal with this issue at Western.

Second, reducing or eliminating the use of SSN across the WKU enterprise is a major undertaking and a significant project. It will take time and resources. Regardless of how thorough the implementation or comprehensive the training, there will be a transitional period post conversion to a GID system that could be manifest by a temporary reduction in the efficiency with which faculty, staff, student and vendor transactions are handled by all those who provide administrative customer service. That is, our customer service to all constituencies could be adversely affected during this transitional period. The SSN has been the unique identifier for many years. Discontinuing this practice is actually more of a *cultural change* than a technical one.

Finally, this project will have *opportunity costs*. Opportunity costs are incurred when resources are allocated to an endeavor at the expense of getting one or more other projects/activities done in the same timeframe. There are a number of institutional priorities on the horizon. Many of the same personnel needed for this project (technical and functional) are needed for those. Examples are One-Stop Billing, the systems implementation pieces needed for DELO, Banner 6 major version upgrade, full implementation of SEVIS, online web admissions, Enterprise Portal and SACS. There are many known others – technical and non-technical. Unknown, new priorities will materialize and become critical. This project must be weighed against those both before and during implementation. While important and necessary, this project is “unglamorous”. From a technical standpoint, it does not result in a perceived or measurable improvement in system capabilities or functionality. On the contrary it will feel like an operational annoyance, especially at first. The benefits are essentially fulfillment of institutional responsibility, reduction of potential liability and possibly a preemptive strike on a future non-funded mandate (should the state legislate this at some point in the future).

**Implementation Committee Members.**

The following committee members participated in the formulation of the contents of this document and endorse the recommendations contained herein.

Gordon Johnson -- Chair

Amy James  
Doris Settle  
Diane Carver  
Greg Kunkel  
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