



AB 07-05
Supersedes AB 99-01
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ADMINISTRATIVE BULLETIN

Date: November 30, 2007

Subject: Use of Social Security Numbers as Client Identification Numbers

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Effective: November 30, 2007

State statute prohibits districts from using social security numbers as student identification numbers:

S. 38.14 (14) **Student identification numbers.** The district board may assign to each student enrolled in the district a unique identification number. The district board shall not assign to any student an identification number that is identical to or incorporates the student's social security number. This subsection does not prohibit a district board from requiring a student to disclose his or her social security number, nor from using a student's social security number if such use is required by a federal or state agency or private organization in order for the district board or the student to participate in a particular program.

The System Office interprets s. 38.14 (14), Stats., to apply to all individuals served by a WTCS district, including those receiving non-instructional services. WTCS students and individuals receiving non-instructional services from WTCS districts are referred to as clients.

S. 38.14 (14), Stats., does not define the term "identification number." In the WTCS, an "identification number" is any alpha/numeric designation up to sixteen characters in length used to differentiate a particular client from all other clients served by the district. Examples of where identification numbers rather than social security numbers must be used include e-mail addresses, invoices for fees or charges, class rosters, grade lists, grade reports, ID cards, and attendance cards. Also, identification numbers are reported to the System Office with the addition of a leading three digit element configured as "9dd", where dd is the district number.

Daniel Clancy, President

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Districts are allowed to require client's to provide their social security numbers when "required by a federal or state agency or private organization." For example, students receiving financial aid are required by federal regulations to disclose their social security numbers. In addition, in order to implement the federal Hope Scholarship or Lifetime Learning Credit programs, the IRS requires higher education institutions to report certain information—including the social security number—for part-time, non-program, and continuing education students with paid course fees and related expenses.

District's shall maintain policies and procedures that ensure that client social security numbers are not used as identification numbers and limit access to social security numbers to situations where "use is required by a federal or state agency or private organization." These policies and procedures apply to all district operations (including enterprise entities such as bookstores, day care, and cafeteria operations) and sub-contractors who serve clients with district resources.

Districts shall include language in student handbooks, course catalogs, and other client materials regarding district collection and permissible uses of the social security numbers.

A handwritten signature in cursive script that reads "Daniel Clancy".

Daniel Clancy
President
Wisconsin Technical College System