

INTERNAL MEMORANDUM

Date: August 10, 2006

To: JoGale Ray, MCSAC President 2006-2007  
✓ Diana Wohlfahrt, USAC President 2006-2007

From: Lauren J. Brisky, Vice Chancellor for Administration and Chief Financial Officer

Re: Identity Protection and Management Recommendation

On June 16, 2006, the University (central) Staff Advisory Council and the Medical Center Staff Advisory Council submitted to Vice Chancellor Jacobson and me a joint recommendation concerning identity protection and management. Thank you to all who contributed to the recommendation. I write to provide information regarding the institution's approach and progress towards limiting the use of Social Security numbers in the conduct of University affairs.

Overall Strategy

Vanderbilt's strategy is threefold – 1) mask or remove Social Security numbers from existing and new core administrative processes and the software applications that support those processes; 2) implement an alternate identifier and 3) strengthen information security measures to address existing and emerging threats to our applications and data.

- 1) **Mask or remove Social Security numbers:** Since the late 1990's and with increased vigilance each year, we have employed a strategy to limit the use of Social Security number as a key data field or primary identifier when not required. This is done primarily by eliminating the overt use of Social Security numbers as we deploy new software applications and/or processing rules supporting our teaching and learning, health care and research missions. Steady progress has been - particularly on printed documents.
- 2) **Implement Alternate Identifier:** In 2006, cross-institutional teams were deployed to architect and execute the technical foundation necessary to support the creation and maintenance of a Vanderbilt "Social Security-like" identifier. This identifier will one day support Vanderbilt's identification and authentication needs that are currently satisfied through use of a Social Security number.
- 3) **Increase Security:** In August 2004, Vanderbilt's first Chief Information Security Officer, Mark Johnson, was appointed. With his guidance and help, we have continually strengthened our ability to detect, diagnose, document and manage through incidents should unauthorized access be made to institutional files and databases.

### Progress/Transition

Throughout the remainder of 2006 and during 2007, core technology areas will complete creation of the technical foundation for an alternative primary identifier. Plans are to introduce an alternative identifier for students in 2007. Subsequently, there will be a phased roll-out of this alternate identifier to other members of the Vanderbilt community in timeframes that make sense considering the complex and vast reach of our administrative infrastructure. For context, please understand that at full adoption, we will have accomplished the assignment of well over 100,000 primary identifiers to faculty, staff, students and alumni. Such is the reality of the multi-faceted, vibrant and growing Vanderbilt community.

### Summary

Our institutional goal is to eliminate the collection, storage and use of Social Security numbers in the conduct of University affairs unless we are required to do so. Progress is being made on many fronts ranging from massive centrally-managed core administrative systems to a single faculty member who maintains a list of students and their social security numbers on a laptop.

### Next Steps

What can the Staff Advisory Councils do to assist in this effort? We ask that you continue to be vigilant. We ask that you report instances where it seems inappropriate for staff to be asked for Social Security numbers. For this purpose, we have identified Susan Hoffman as a point of contact. Susan is a member of my staff and can be reached at 343.6657 or [susan.hoffman@vanderbilt.edu](mailto:susan.hoffman@vanderbilt.edu).

Thank you again for your thoughtful recommendation.

cc: Vice Chancellor Jacobson