



Federal Initiatives

Social Security Numbers: Federal Actions Could Further Decrease Availability in Public Records, though Other Vulnerabilities Remain (GAO-07-752, June 2007)

The federal government has recently examined the availability of social security numbers in public records. This June, 2007 Government Accountability Office report recommended, at a minimum, that social security numbers be truncated in liens and lien releases issued by the Internal Revenue Service, and that federal agencies should continue to take steps to mitigate the availability of social security numbers in public records.

Memo: Safeguarding Against and Responding to the Breach of Personally Identifiable Information (M-07-16, May 22, 2007)

The United States Office of Management and Budget also recently issued a memo to the heads of all federal executive agencies and departments directing each agency to safeguard against the breach of personally identifiable information. The memo requires all agency and department heads to implement a framework for ensuring proper safeguards are in place to protect personal information collected by the agency, and to develop a breach notification policy.¹ Most notably, however, for purposes of discussion of this FOIA/JCOTS subcommittee, is the directive to agencies to review their use of social security numbers and to identify when such use or inclusion of such information in a document or program is superfluous. Agencies were directed to eliminate the unnecessary collection and use of social security numbers within eighteen months (roughly the end of 2008). Agencies were also directed to participate in a government-wide effort to explore alternatives to the use of a social security number as a personal identifier.

¹ JCOTS has previously discussed the issue of database breach notification as it relates to private entities, but recommended that federal legislation be adopted to address this issue to ensure uniformity of response to a breach. However, JCOTS work did not examine database breach notification as it might apply to information held by public bodies. Because the focus of HB 2821 and SB 819 is about public access to personal information, this memo will not delve into the database breach issue. However, substantial information about this topic could be made available, upon request.