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May 28, 2010

The Honorable Michael A. Delaney, Attorney General
State of New Hampshire
33 Capitol Street
Concord, NH 03301

Re: Saint Anselm College, Manchester, NH – inadvertent potential disclosure of social security numbers

Dear Attorney General Delaney:

I am writing on behalf of Saint Anselm College to inform you of an inadvertent potential disclosure of social security numbers of New Hampshire residents. As explained below, we know of no actual disclosure to unauthorized individuals, and do not believe this is a reportable event under RSA 359-C. We have nevertheless chosen to err on the side of caution and provide the information set out in this letter in any case.

On May 26, the College was advised by a recipient of the current issue of *Portraits*, the Saint Anselm College alumni magazine, that her social security number appeared in coded form on the address label of the magazine, which she received recently. After investigation, we believe that approximately 122 New Hampshire –address recipients of this issue had their social security numbers printed on the label in this fashion (for this issue only; this problem has not occurred in the past.)

The College has notified all of the individuals it believes may have had their social security numbers printed on labels as described above, and of the steps that it has taken in response. A sample copy of the letter sent to these individuals on May 28 is enclosed. As explained in that letter, social security numbers were once used as employee identification numbers to generate mailing labels. The College discontinued the practice of providing social security numbers in information provided for *Portraits* address lists several years ago. It has now purged the social security number information from the database.

RSA 359-C by its terms applies to “security breaches”, which involve unauthorized acquisition of computerized data that compromises the security or confidentiality of personal information. For several reasons, this situation does not fall under this definition. To our knowledge and belief there has been no

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unauthorized acquisition of data – no one has obtained personal information who should not have. The mailing labels bearing social security numbers went to the holders of those social security numbers. The “data”, in the form of the social security numbers, were not in computerized form. We are aware of no instance in which the security of anyone’s personal information was compromised. Indeed, compromising a social security number from these labels would require: a) that someone other than the intended recipient obtain the label; b) that such person recognize that the string of numbers is in fact a social security number; and c) that the person obtaining the number misuse it. In short, we do not believe the statute covers this situation: there has been no unauthorized acquisition, no computerized data, and no compromise of security.

Please contact me should you have any questions.

Sincerely,



Sean M. Gorman

Cc: Fr. Jonathan DeFelice, O.S.B., President, Saint Anselm College
Suzanne K. Mellon, Ph.D., RN, Executive Vice President and Professor, Saint Anselm College
Patricia R. Shuster, Vice President for Administration, Saint Anselm College

May 28, 2010

<name>

<address>

<city, state, zip>

Dear <name>:

On Wednesday, May 26, 2010, we learned that some of the address labels for the issue of *Portraits* mailed out the week of May 24th contained individual social security numbers in a line of coded information above the name and address. An investigation into the matter began immediately. We have subsequently determined that this problem is limited to a group of some current, and former, faculty and staff. A careful review of our records indicates that you are likely to be among this group.

This mistake has not occurred previously. It happened because a historical College Advancement database from which some faculty/staff labels were printed contained social security numbers. When the Advancement database was created in the 1980's, faculty and staff names and addresses were transferred from the previous AS400 along with their employee identification (ID) number. As you may be aware, social security numbers were formerly part of student, staff and faculty ID numbers. The student, staff and faculty ID process changed several years ago so that social security numbers are no longer used as identification numbers.

In this single instance for the May 2010 mailing, the ID/social security field was inadvertently included in a coded form in the label template. To prevent any recurrence, social security numbers have now been purged from this database, and the mailing list used in this instance has been destroyed.

We are aware of no instance of any individual's social security number falling into the wrong hands; the only labels sent out containing social security numbers were sent to the owners of those social security numbers. We nevertheless view this as a serious matter and have addressed it with urgency. In this effort my staff has been assisted by representatives of the offices of communications and marketing, information technology, human resources, and the senior leadership team. Now that this problem has been investigated and all necessary corrections have been made, we will resend the magazine to you with your address label as it will appear on future issues.

The college is committed to safeguarding the personal information of all faculty and staff. To allay any concerns about identity theft or other misuse of your social security number, the college is prepared to offer a full year of credit monitoring through *LifeLock* to any individual whom we believe may have had his/her social security number printed on a label in this fashion.

Experts agree that awareness is the most effective weapon against identity theft. The Federal Trade Commission offers more information and tips on this issue at <http://www.ftc.gov/bcp/edu/microsites/idtheft/consumers/consumer-publications.html>.

I regret this occurrence and we have taken steps to correct this situation. If you have any questions regarding this matter, please do not hesitate to contact me directly at (603) 641-7221. I have included below the names and extensions of those administrators who were involved in the investigation of this situation and are also able to answer questions you may have and/or speak to you about enrolling in *LifeLock*. You may feel free to contact any of us with questions.

Sincerely,

James F. Flanagan
Vice President for College Advancement

cc: Fr. Jonathan DeFelice, O.S.B., President
Suzanne K. Mellon, Ph.D., RN, Executive Vice President and Professor

Janet Kolkebeck
Associate Vice President for College Advancement, ext. 7375

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