

**SSID Frequently Asked Questions – Policy**

#	Question	Answer	Related FAQs
P-1	Is there any guidance available to districts regarding student records maintenance and transfer and the protection of student privacy?	<p>Federal (Family Educational Rights and Privacy Act (FERPA), 20 U.S.C.. 1232(g)) and Ohio law (Ohio Revised Code (ORC) §3301.0714) give guidance regarding proper and improper practice for records maintenance and transfer.</p> <p>ODE is working to further clarify proper practice for transfer of the SID from one district to the next. We will be releasing additional guidance in the very near term. In the meantime, ODE recommends that each district confer with their legal counsel to ensure that student records are stored, maintained, and transferred appropriately, and that the SID be treated in the same secure manner as other confidential student records. Districts may elect to use the routines provided by the State Software Development Team (SSDT) to electronically transfer SIDs between districts when multiple entities are responsible for student EMIS data. Use of the routines <b>MUST</b> occur with consent of all entities involved in the transfer.</p>	<p>P-3 P-12 P-14 P-18 P-19 P-20 P-26</p>
P-2	Is it necessary to routinely send IBM updates of SID identifying attributes?	<p>No. The SSID database’s purpose is not to track student movement across the state or to record updated information on Ohio students. The system’s purpose is assignment of unique SIDs for EMIS reporting purposes. Local student information systems maintained by districts and DA-sites should be updated with the most current information about students. The EMIS database maintained by ODE will have the ability to track student mobility and progress over time. There is no requirement that districts routinely send IBM all student identifying attributes to update the SSID database. However, if there</p>	

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		<p>are known changes to the mandatory identifying attributes for SID assignment, users should follow the procedures outlined by IBM for handling such changes. Because the SSID System is used solely to assign SIDs, information such as IRNs may not reflect the current district of residence for a student. As noted, local student information systems and/or EMIS should be used to acquire this type of information.</p>	
P-3	<p>Do districts obtain SIDs from previous district or use the SSID site maintained by IBM?</p>	<p>The Ohio Revised Code (ORC §3301.0714(D)(2)) provides the following guidance:</p> <p>“Each school district shall ensure that the data verification code is included in the student’s records reported to any subsequent school district or community school in which the student enrolls and shall remove all references to the code in any records retained in the district or school that pertain to any student no longer enrolled. Any such subsequent district or school shall utilize the same identifier in its reporting of data under this section.”</p> <p>After consultation with the Ohio Attorney General’s Office regarding interpretation of this language and its implications when combined with the federal education law (FERPA, 20 U.S.C.. 1232(g)), ODE offers the following guidance:</p> <ul style="list-style-type: none"> <li>• When a student moves from one district to the next or is involved in multiple districts due to cross enrollment, districts should share SID information through secure mechanisms. Ohio law requires that the sending district share the SID information with the receiving district. See P-1 for details on</li> </ul>	<p>P-1 P-12 P-18 P-19 P-20 P-26</p>

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		<p>how to securely share the information. The sending district should redact the SID from any remaining hard copy district records and ensure that the SID continues to be accessible within electronic databases only by those responsible for EMIS reporting.</p> <ul style="list-style-type: none"> <li>• In the absence of timely information from the sending district, the receiving district should use the SSID website to obtain the SID.</li> <li>• Districts may elect to use the routines provided by the State Software Development Team (SSDT) to electronically transfer SIDs between districts when multiple entities are responsible for student EMIS data. Use of the routines <b>MUST</b> occur with consent of all entities involved in the transfer.</li> </ul>	
P-5	What are the consequences of not using SIDs in reporting EMIS student data?	The student’s record will receive a fatal error flag and will not be processed with the district’s EMIS data sent to ODE. Ultimately, this could reduce district funding and/or have negative effects on the district’s compliance with data accountability requirements (Ohio Revised Code §3301.0714(L)).	P-6
P-6	For which students are SIDs required for EMIS reporting?	<p>SIDs <u>are</u> required for EMIS reporting in the following situations:</p> <ul style="list-style-type: none"> <li>• Student is educated by the school district (city, exempted village, local, community school, ESC, or JVSD) and Student Percent of Time &gt;0% <ul style="list-style-type: none"> <li>○ Includes home school students taking <b>any courses</b> at the public district.</li> </ul> </li> <li>• Student Percent of Time = 0% AND Attending Home Status ≠</li> </ul>	P-5

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		<p>0</p> <ul style="list-style-type: none"> <li>○ Student not being educated by the reporting district but is being educated by another entity.                             <ul style="list-style-type: none"> <li>▪ Includes resident districts reporting a student educated by another district through open enrollment or community school enrollment.</li> <li>▪ Includes situations where student is a resident of District A , open enrolled into District B, and attending the ESC 100%. In this case, the ESC, District A, and District B ALL must report the student with his/her SID.</li> </ul> </li> <li>● Students reported with Student Status = 6.                             <ul style="list-style-type: none"> <li>○ Applies to nonpublic students receiving services only from the public school district.</li> </ul> </li> <li>● Students reported with Student Status = U.                             <ul style="list-style-type: none"> <li>○ Applies to state supported schools (e.g., OSB, OSD, MR/DD).</li> </ul> </li> </ul> <p>SIDS <u>are not</u> required for EMIS reporting in the following situations:</p> <ul style="list-style-type: none"> <li>● Students not enrolled in the school district AND only taking the proficiency test in the district AND not taking any courses in the school district.                             <ul style="list-style-type: none"> <li>○ District only reports the Proficiency ONLY record in EMIS for these students. This record does not require the SID.</li> <li>○ Situation includes home school students NOT TAKING COURSES at the district but taking the proficiency test.</li> </ul> </li> </ul>	

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P-7	What are the roles of districts, student software vendors, ODE, IBM, and DA-sites in the SSID System support network?	<p><b>System Users/Data Suppliers</b></p> <ul style="list-style-type: none"> <li>• Who Does It?                             <ul style="list-style-type: none"> <li>– All districts, JVSDs, community schools, and ESCs.</li> </ul> </li> <li>• Responsibilities?                             <ul style="list-style-type: none"> <li>– Data cleansing as needed to ensure accurate assignment of SIDs.</li> <li>– Incorporation of SIDs into EMIS submission process.</li> </ul> </li> </ul> <p><b>Student Software Vendors</b></p> <ul style="list-style-type: none"> <li>• Who Does It?                             <ul style="list-style-type: none"> <li>– All student software vendors serving districts, JVSDs, community schools, and ESCs.</li> </ul> </li> <li>• Responsibilities?                             <ul style="list-style-type: none"> <li>– Ensure that mandatory identifying attributes are included in software package.</li> <li>– Automate the process for linking the student software to the SSID System as a batch submission process.</li> </ul> </li> </ul> <p><b>Tier 1 System Support</b></p> <ul style="list-style-type: none"> <li>• Who Does It?                             <ul style="list-style-type: none"> <li>– DA-Site and B-site Points of Contact</li> </ul> </li> <li>• Who Can Submit Questions?                             <ul style="list-style-type: none"> <li>– <u>User</u> questions about SSID System training, use, and functionality.</li> </ul> </li> <li>• Where Is It?                             <ul style="list-style-type: none"> <li>– Designated DA-Site contact.</li> </ul> </li> <li>• Service Responsibilities?</li> </ul>	

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		<ul style="list-style-type: none"> <li>– Track and answer questions from districts relative to the SSID.</li> <li>– Determine whether SSID questions relate to system functionality or extra-system issues.</li> <li>– Pass on SSID functionality questions to IBM.</li> <li>– Distribute IBM answers back to users.</li> <li>– Train new users.</li> </ul> <p><b>Tier 2 System Support</b></p> <ul style="list-style-type: none"> <li>• Who Does It?                             <ul style="list-style-type: none"> <li>– IBM SSID Helpdesk                                     <ul style="list-style-type: none"> <li>• <a href="mailto:SSIDQuestions@us.ibm.com">SSIDQuestions@us.ibm.com</a></li> </ul> </li> <li>– IBM will not receive any email sent to the old address...                                     <ul style="list-style-type: none"> <li>• <a href="mailto:SSIDQuestions@us.ibm.com">SSIDQuestions@us.ibm.com</a>.</li> </ul> </li> </ul> </li> <li>• Who Can Submit Questions?                             <ul style="list-style-type: none"> <li>– <u>Point of Contact</u> questions about SSID System training, use, and functionality.</li> </ul> </li> <li>• Service Responsibilities?                             <ul style="list-style-type: none"> <li>– Respond to and address SSID functionality issues posed by Points of Contact.                                     <ul style="list-style-type: none"> <li>• IBM will provide the same level of service to users that DA-sites and districts received from the IBM team.</li> <li>• Members of the same friendly and customer-responsive team are still involved in the project.</li> </ul> </li> <li>– Send questions posed by users back to respective DA-Sites.</li> </ul> </li> </ul>	

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		<ul style="list-style-type: none"> <li>– Implement system enhancements approved by SSID Advisory Group.</li> </ul> <p><b>Tier 3 System Support</b></p> <ul style="list-style-type: none"> <li>• Who Does It?                             <ul style="list-style-type: none"> <li>• ODE</li> </ul> </li> <li>• Who Can Submit Questions?                             <ul style="list-style-type: none"> <li>– IBM</li> <li>– DA-site and district Points of Contact</li> <li>– SSID Advisory Group members</li> </ul> </li> <li>• Service Responsibilities?                             <ul style="list-style-type: none"> <li>– Respond to and address SSID policy issues posed by Points of Contact.</li> <li>– Determine funding for system enhancements approved by SSID Advisory Group.</li> </ul> </li> </ul>	
P-10	Why would I delete an SID?	<p>The only reason to delete an SID is if it is found to be a proven duplicate SID. If a student moves out of state, transfers to a private school, dies, withdraws or graduates, the SID should NOT be deleted. Note that a record deletion actually deactivates the SID from the production SSID database so that it can no longer be used. Districts are cautioned that unless the deletion is conducted as part of a system-wide duplicate clean-up process, districts should confer with other reporting entities using different SIDs for the same student prior to making the deletion. If a deletion is conducted in error, districts may contact IBM for assistance in re-activating the record.</p>	IBM Functional FAQ, F-37

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P-11	What if a district does not have access to one of the 9 mandatory identifying attributes to assign an SID? For example, a student may have moved outside the state before all information could be obtained.	Contact ODE to assist in resolving these types of exceptions. If the situation is such that the data cannot be obtained, then ODE will notify IBM to manually assign an ID.	
P-12	What if a parent refuses to provide immigration forms or a birth certificate for student identification?	Per the federal Missing Child Act (28 USC 534) and Ohio law (Ohio Revised Code (ORC) § 3313.672), districts are required to obtain reliable identification from parents upon enrollment in public schools. This can be obtained from birth certificates, passports, or immigration forms, for example. Districts may wish to check with their legal counsel on this issue since proof of identity is required based on federal and state law, and lack of proof triggers certain actions.	
P-13	What if a student has only one name?	Students who immigrated to the U.S. from India or the Middle East may have this characteristic, depending upon the region where they were born. If the immigration papers truly contain only one name, a district can ask whether the parents may have applied for a social security card for the student or if there is any paperwork relating to a legal name change through a court. If none of this documentation is available or has the requisite naming convention required for the SID, then the district should use the father’s last name since it is most often used when legal name changes occur in such situations.	
P-14	Does the state have forms that are suggested for use by districts	No. ODE is working to further clarify proper practice for transfer of the SID from one district to the next. We will be releasing additional	P-1 P-3



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	when students transfer in order to ensure secure transfer of SIDs?	guidance in the very near term. In the meantime, ODE recommends that each district confer with their legal counsel to ensure that student records are stored, maintained, and transferred appropriately, and that the SID be treated in the same secure manner as other confidential student records. Districts may elect to use the routines provided by the State Software Development Team (SSDT) to electronically transfer SIDs between districts when multiple entities are responsible for student EMIS data. Use of the routines MUST occur with consent of all entities involved in the transfer.	P-18 P-19 P-20 P-26
P-15	What reports will ODE provide to help troubleshoot SID issues?	ODE will provide verification reports to districts that will assist in determining whether two students have been assigned the same SID. These will be released as part of the normal EMIS production process and will be similar to the current crossflow reports. These reports will specify whether SIDs are missing, invalid, or have potentially been used for multiple students.	
P-17	What mechanism is there for districts to give ODE formal feedback on the operation of the SSID System?	ODE facilitates an SSID User Advisory Group that meets quarterly and conducts audioconference sessions as needed. Individual districts may contact ODE to identify issues for advisory group discussion.	
P-18	How should districts use and store the SID?	Only use the SID for EMIS reporting purposes. This helps to protect the privacy of student records. Districts should limit access to the “crosswalk” that links personally identifiable information and the SID. Only district personnel responsible for EMIS reporting and IBM can have access to the crosswalk. ODE recommends that each district confer with their legal counsel to ensure that student records are	P-1 P-3 P-12 P-19 P-20 P-26

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		stored, maintained, and transferred appropriately, and that the SID be treated in the same secure manner as other confidential student records.	
P-19	Who is ultimately responsible for safeguarding the privacy of student records?	Districts, not ODE, are responsible for establishing and implementing policies and procedures that ensure the security of student records. This applies to the storage of records and the transmittal of student records to other districts when a student is cross-enrolled or transfers. Districts can refer to the Family and Educational Rights and Privacy Act (FERPA, 20 U.S.C.. 1232(g)) to ensure that district policy and practice for student records are aligned with federal law. The Office of Family Compliance website ( <a href="http://www.ed.gov/offices/OM/fpco/">http://www.ed.gov/offices/OM/fpco/</a> ) is another source of information for districts.	P-1 P-3 P-12 P-18 P-20 P-26
P-20	Can ODE give specifics as to what is not permissible practice regarding use, storage, and transfer of the SID?	ODE recommends that districts <u>do not</u> ... <ul style="list-style-type: none"> <li>• Use the SID as a replacement for other student identifiers.</li> <li>• Store the SID in hard copy file locations that are not secure. An example of a secure location is a locked file cabinet only accessible by staff with appropriate clearance.</li> <li>• Permit access to the SID for those not responsible for EMIS reporting.</li> <li>• Transmit the SID to other districts via fax.</li> <li>• Generate reports listing SIDs and the corresponding crosswalk of identifiable student data (e.g., directory listings, school photo reports, testing booklets, report cards, transcripts).</li> </ul>	P-1 P-3 P-12 P-18 P-19 P-26
P-21	What is the enabling legislation	<b>Excerpt from ORC § 3301.0714 Pertaining to the Statewide</b>	

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	for the SID?	<p><b>Student Identifier (i.e., “data verification code”)</b></p> <p>(D)(1) The guidelines adopted under this section shall require school districts to collect information about individual students, staff members, or both in connection with any data required by division (B) or (C) of this section or other reporting requirements established in the Revised Code. The guidelines may also require school districts to report information about individual staff members in connection with any data required by division (B) or (C) of this section or other reporting requirements established in the Revised Code. The guidelines shall not authorize school districts to request social security numbers of individual students. The guidelines shall prohibit the reporting under this section of any personally identifiable information about any student, including a student's name or address, to the state board of education or the department of education. The guidelines shall also prohibit the reporting under this section of any personally identifiable information about any student, except for the purpose of assigning the data verification code required by division (D)(2) of this section, to any other person unless such person is employed by the school district or the data acquisition site operated under section <a href="#">3301.075</a> [3301.07.5] of the Revised Code and is authorized by the district or acquisition site to have access to such information. The guidelines may require school districts to provide the social security numbers of individual staff members.</p> <p>(2) The guidelines shall provide for each school district or community school to assign a data verification code that is unique on a statewide basis over time to each student whose initial Ohio enrollment is in that</p>	

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		<p>district or school and to report all required individual student data for that student utilizing such code. The guidelines shall also provide for assigning data verification codes to all students enrolled in districts or community schools on the effective date of the guidelines established under this section.</p> <p>Individual student data shall be reported to the department through the data acquisition sites utilizing the code but at no time shall the state board or the department have access to information that would enable any data verification code to be matched to personally identifiable student data.</p> <p>Each school district shall ensure that the data verification code is included in the student's records reported to any subsequent school district or community school in which the student enrolls and shall remove all references to the code in any records retained in the district or school that pertain to any student no longer enrolled. Any such subsequent district or school shall utilize the same identifier in its reporting of data under this section.</p>	
P-22	What is the Statewide Student Identifier System (SSID)?	The SSID System is the cornerstone of the student-level EMIS. The Student Identifier field (SID) provides the opportunity for ODE to collect student level data without jeopardizing student privacy. The SSID System assigns a unique identifier to every student receiving services from Ohio's public schools. This code will "follow" students as they move within and between Ohio districts, enabling studies of	

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		<p>student progress and performance trends over time. Implementation of the SSID System was completed during the 2002-03 school year. The system has the following functions:</p> <ul style="list-style-type: none"> <li>• Prevents the identification of actual student names, social security numbers, or other personal data that could breach individual confidentiality.</li> <li>• Stores matching data and associated student identifier codes throughout the course of each child’s education.</li> <li>• Facilitates assignment of individual SIDs or mass assignment of SIDs through batch processing or an online, web service.</li> <li>• Implementation considers the burden on districts and intends to provide added value to districts.</li> </ul>	
P-23	How does the SSID System work in conjunction with local district student software systems?	The SSID System does not replace a district’s student software, nor is it the entirety of the student level EMIS. It is a complement to both the district’s student software and the student level EMIS database maintained by ODE. It will work in conjunction with these information systems to provide the linkage for student level data from districts to ODE so that student privacy is not compromised.	
P-24	How is the SID used by ODE in the EMIS database?	The SID will be the “key” for student records stored at ODE. This means that each student record will be identified with an SID. Each student will have only one record in the ODE database, which will facilitate longitudinal tracking for analysis of performance and program trends. The SID is the mechanism by which ODE can collect student level data and still protect the individual privacy rights of students.	

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P-25	How do I handle adopted student names in the SSID System?	If the student’s previous last name is known, follow the process outlined by IBM for modifying an identifying attribute. If the student’s previous last name is unknown due to the provisions of the courts in protecting the student’s identity, a duplicate SID record will be produced out of necessity. This is preferable to jeopardizing student privacy. Follow the process for assigning a new SID. See IBM FAQ F-31 for details on how to handle name changes for adopted or newly married students.	IBM Functional FAQ, F-31
P-26	What if I am a district of residence for a community school, or a JVS or ESC? Is there an easy way for me to get a student’s SID that is secure?	Districts involved in reporting students who are cross-enrolled (JVSs and ESCs) or are enrolled in community schools should use the automated process outlined by the State Software Development Team (SSDT) to obtain SIDs. <b>Both districts must consent to sharing the data prior to implementing this solution.</b>	P-1 P-3 P-12 P-18 P-19 P-20