

**Commission on Dietetic Registration
Registration Eligibility Processing Procedure
Social Security Number Requirements for
Verification Statements and the CRMS Online System**

April 2013

The following information is provided to dietetic educator program directors to provide clarification about the Commission on Dietetic Registration's registration eligibility requirement for all candidates to provide the last four digits of their social security number (SSN) on their initial application. CDR understands that this requirement is in conflict with some educational institutions policies not to use, record or store the SSN in the student academic record. The following response is from CDR's legal Counsel regarding the Academy/CDR use of the SSN in application verification and processing.

The Privacy Act of 1974 that gave rise to the limitations regarding the collection and use of the SSNs. Specifically, that Act is applicable to federal, state and local government agencies, and also to school boards and school districts. All such entities are precluded from denying benefits or rights to individuals on account of their refusal to provide the SSN. The federal, state and local government agencies are also prohibited from requesting that an individual disclose his or her SSN unless the individual is advised whether the disclosure is mandatory or voluntary, by what statutory or other authority the disclosure is solicited, and the uses to which the SSN will be put.

*Consequently, the federal law does not prohibit CDR or other private entities from requesting the SSN. However, various advocacy groups are advising citizens to refuse to disclose their SSNs to non-governmental agencies, and it may become somewhat problematic (practically more than legally) to deal with an applicant who refuses to disclose. **It appears, therefore, that CDR can legally continue to require the disclosure of the SSN by its applicants.***

CDR currently uses the social security number to prevent the creation of duplicate member and registry records, since CDR shares its demographic database with the Academy. Based on the legal input, CDR will continue to request the social security number for each applicant for registration eligibility.

The student is required to provide the last four digits of their social security number on the CDR Registration Eligibility Application and for entry on the student record when the program director enters the SSN on the CRMS online system. Program directors submitting the class completion documents on a pdf file by e-mail should retain the original documents in the student's file. Only the last four digits are required for entry on the ACEND Verification Statement.