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Comptroller of the Currency  
Administrator of National Banks

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Subject: Social Security Numbers As Personal Identification Numbers

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**TO:** The Chief Executive Officer and the Compliance Officer of Each National Bank  
and all Examining Personnel

The purpose of this advisory is to alert you to the potential for security breaches or fraud through unauthorized access to customer accounts.

We are aware that some banks are allowing their customers to use the telephone to access account information and transfer funds between accounts. In many cases the customer only has to key in the account number and the last four digits of his or her social security number, which serves as the personal identification number (PIN). The use of the customer's social security number, or any other commonly used number, as the PIN, could make unauthorized access to customer accounts or frauds easier.

Social security numbers are now used in many states for driver license numbers or are required on the license. Many merchants who cash personal checks or accept payment by check require the customer's driver license number for identification purposes. As a result, anyone in possession of this information could access a customer's account.

We recommend that banks that offer telephone access to customer accounts devise PIN numbers that ensure adequate security for customer accounts. The use of social security numbers for PIN numbers may not safeguard account security for bank customers and could subject the bank to civil liability. In addition, national bank examiners may cite this practice as an internal control exception.

If you have any questions about this advisory please contact your supervisory office or the Compliance Management Department at (202) 874-4810.

/s/Phillip R. Freer, Jr.  
Acting Deputy Comptroller for Compliance Management