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**VIA FACSIMILE AND MAIL**

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January 8, 2007

Mr. David Nenne, President  
Williams Unified School District No. 2 Governing Board  
515 S 9th St  
Williams, AZ 86046

Re: **Civil liberties implications of using fingerprinting scanning systems in school lunch lines**

Dear President Nenne:

We are writing to express our grave concern about the use of a new biometric system to scan the fingerprints of students in the cafeteria lines at Williams Elementary/Middle School.

According to a short news brief entitled "Cafeteria News" that was printed in a recent Williams Elementary/Middle School newsletter, the school plans to implement a new biometric data collection system that will store students' fingerprints in an attempt to reduce the amount of time students spend in line and identify students when they buy their lunches.

While we understand the benefit for your school in streamlining day-to-day administrative tasks in a timely manner, we do not believe school officials should recklessly gamble students' precious privacy rights and waste scarce financial resources by serving as a guinea pig for the proponents of this fingerprinting scanning system.

Any supposed gain in efficiency that results from the use of this fingerprinting scanning system is more than offset by the dangers imposed in implementing this intrusive technology. We urge the Williams Unified School District No. 2 Governing Board to recognize the serious civil liberties implications of this program and abandon plans to implement this ill-advised project immediately.

Toward that end, we offer the following questions and observations:

**DATA BREACHES**

Independent security experts and parent groups have voiced strong opposition to the use of biometrics in schools for the provision of "front-end services" such as registration and cashless catering. They argue that these systems can be hacked and that fingerprints are, in fact, stored, despite the manufacturers' claims otherwise.

IdentiMetrics, which created the technology, states that the technology only scans a unique configuration of students' fingertips – rather than scanning the full fingerprint.

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These points are then converted into a series of numbers, which would be used to identify students when they bought their lunches.

However, the fact that the fingerprinting system does not store the actual print as a picture is even more problematic because most fingerprint databases don't actually store the entire fingerprint either. They typically store data points that are much easier for comparison, making stored 5-point fingerprint comparisons the equivalent of having entire prints on file.

Identity management security expert Andrew Clymer goes on to state that: "The fact that it is able to compare an input against this number and determine a match is the critical issue. It does not seem beyond the bounds of possibility that by understanding what the vital points are you should be able to manufacture a print that exhibits these points."<sup>1</sup>

The issue of storage is also important because it's virtually impossible to completely erase data on a computer's hard drive. Security information consultant Dom Devitto strongly discourages holding large amounts of biometric information at any school site because "fundamentally, such information may be used one day to legally validate the individual, e.g. on a passport. Consequently, the value of this information ... is high."<sup>2</sup>

The school districts and the company have not provided adequate assurance about how they will protect the children's personal information from unauthorized access, use, and disclosure. What's even more frightening is that security experts now claim that they have succeeded in extracting full fingerprint scans from cheap scanners such as those used in schools, which raises questions about who will have access to the information stored in the school's database and how long it will be retained.<sup>3</sup> Will this information become part of the basic student report that follows students throughout the various grade levels or when transferring to other schools? Will school resource officers and police officers have access to this data?

In addition to raising privacy concerns, requiring elementary and middle school students to submit their fingerprints is demeaning to all children. By collecting fingerprints from students, like the police collect the fingerprints of people who have committed crimes, the Williams Elementary/Middle School is sending the message that it is perfectly acceptable for schools to treat students like criminals for the sake of greater efficiency.

## **FISCAL CONSIDERATIONS**

Williams Elementary, like most school across the state, has been particularly hard-hit by severe lack of funding. We were told that the Food Service Director purchased the fingerprinting system for approximately \$7,000. In analyzing the fiscal costs, the question is not merely how much was spent on the fingerprinting scanning system, but what other items such as school supplies, books, or tutorials, could have been purchased with the same or less amount of money.

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<sup>1</sup> Do Biometrics have a role for school registration? by Andrew Clymer  
[http://www.LeaveThemKidsAlone.com/docs/Do\\_Biometrics\\_have\\_a\\_place\\_in\\_school\\_3.pdf](http://www.LeaveThemKidsAlone.com/docs/Do_Biometrics_have_a_place_in_school_3.pdf)

<sup>2</sup> <http://www.leavethemkidsalone.com/security.htm>

<sup>3</sup> [6] German researchers claim to have reconstructed full fingerprints  
<http://www.heise.de/ct/english/02/11/114/> (final section)

While the use of biometric technology by government entities and private businesses is becoming much more common, schools such as Williams Elementary – with its limited resources – cannot compete with the multi-million dollar budgets that allow governments and companies to regularly update their security systems to protect themselves against security breaches. The unfortunate reality is that school officials may face the possibility of litigation and multiple claims for substantial damages in the event of such an unfortunate disaster.

Lower-cost alternatives such as a punch-number system where students punch in a number as they moved through the line have been proved to be much better in terms of privacy and security of data.

### **INCREASING OPPOSITION**

A growing number of lawmakers and parent groups across the country have opposed similar measures. In fact, Iowa passed laws forbidding schools to collect students' fingerprints. A similar proposal in Irvine, California to scan fingerprints of 2,200 high school students was also scrapped after parents argued it would violate teens' privacy rights.

Given the serious concerns raised by the implementation of this new program, the school's decision to move forward without consulting parents is particularly alarming. It is our understanding that no parents were consulted in advance about the use of this technology, nor were they given the opportunity to question the supposed justification for the system before receiving this newsletter article announcing its forthcoming implementation.

We urge the Governing Board to respect the privacy and civil liberties concerns of students and families and abandon its plan to scan students' fingerprints.

Sincerely,

Alessandra Soler Meetze  
Executive Director  
ACLU of Arizona

cc: Dr. Thomas L. McCraley, Superintendent  
Donny Bridges, Principal - Elementary/Middle School  
Becky Nelson, Governing Board Member  
Janet Cothren, Governing Board Member  
Bud Parenteau, Governing Board Member  
Ron Stilwell, Governing Board Member