Legal Counsel Division STATE COURT ADMINISTRATOR'S OFFICE



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Examples of "Financial Account Numbers" (effective January 1, 2021)

General Rule of Practice 11 prohibits restricted identifiers in all court filings, except when germane and necessary for the court's consideration of the issues before the court. If restricted identifiers must be provided to the court, they must be filed in accordance with the procedures set out in General Rule of Practice 11. "Restricted identifiers" include Social Security Numbers (SSN), employer identification numbers (EIN), and other taxpayer identification numbers (TIN), such as the ITIN issued by the IRS to people who are not eligible for Social Security (a 9-digit number, beginning with the number "9", formatted like an SSN (NNN-NN-NNNN)). "Restricted identifiers" also include financial account numbers. Filers may include the last four digits of financial account numbers in public court filings, but may not include any portion of a SSN, EIN or TIN in a public court filing.

General Rule of Practice 11.01(b) defines "financial account number" as "a string of numeric or alphanumeric characters assigned to a credit, deposit, trust, insurance, or other account that can be used by someone other than those authorized to access the account to obtain access to the account for unauthorized transactions, provided that a billing number issued by a government entity which number is publicly accessible from that government entity is not a financial account number under this rule."

When reviewing documents presented for filing, court staff will make their determination on whether a number can be used for unauthorized for transactions based on what can be seen in, or inferred from, a document. Filers are responsible for knowing whether, in fact, the numbers in their documents can be used for unauthorized transactions. After a document has been accepted for filing, court staff could still initiate the striking process for wrongful inclusion of a financial account number on a public document based on, for example, credible evidence from an opposing party that the number could be used for unauthorized transactions.

As authorized by Rule 11.01(b), and for the convenience of filers, the State Court Administrator's Office establishes the following non-exclusive list of examples of financial account numbers:

Number Type	Financial Account Number?
Agency case number (county attorney, child support, etc.)	No
Alien registration number	No
Annuity contract number	Yes

Billing number from a government agency, which is publicly accessible from that government agency	No
For example, in a property tax appeal, filers often include a copy of their property tax statement, most of which is often publicly accessible from the county website, and the statement may include various billing type numbers labelled as account number, billing number, parcel or property ID numbers, and even taxpayer ID numbers. Filers are responsible for determining whether all of these billing-type numbers are publicly accessible from the county.	
Billing number from a service provider (medical facility account, fuel oil account, telephone account, etc.) that can be used by someone other than those authorized to access the account to obtain access to the account for unauthorized transactions	Yes
Certificate of deposit or stock certificate number	Yes
Checking or savings account number	Yes
Credit account number	Yes
CUSIP identifier	No
EBT card number	Yes
Frequent flyer account number	Yes
Insurance claim number	No
Insurance group ID number	No
Insurance policy number uniquely associated with the policy holder that can be used by someone other than those authorized to access the account to obtain access to the account for unauthorized transactions	Yes
Invoice number	No
Lease number	No
Medicaid recipient ID (MMIS)	Yes
Money order numbers	Yes

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Mortgage identification number	No
Although a mortgage identification number may be publicly accessible from other government agencies such as a county recorder, the issue, under the revised definition of "financial account number," is not whether the number is available from another agency, but whether the number could be used to access a financial account for unauthorized transactions. State Court Administration has determined that mortgage identification numbers cannot be used for unauthorized transactions.	
Number from a charged-off credit or debit account	Yes
Patient ID	No
Professional license number	No
Property tax ID number	No
Retirement account number	Yes
Retirement account numbers are restricted identifiers, but numbers that merely identify a retirement plan (such as the three-digit code assigned to a particular employer's plan) are not considered restricted identifiers. Filers are responsible for determining whether a number associated with retirement benefits identifies a particular retirement account.	
Series EE bond serial number	No
SSIS (Social Services Information System)	No
Student ID number	Yes
Treasury direct account number	Yes
Vehicle title number	No
Veterans Affairs (VA) identifying number	Yes
WID (worker identification) number used by MN Department of Labor and Industry	No