



stating that [Requestor's] sentence was to run concurrent! [sic] or the statement that was given to discontinue such status please . . . ." (Requestor's RTKL Request.) The open-records officer granted Requestor access to copies of his court commitments but redacted Requestor's state identification number (SID number<sup>2</sup>) from these documents on the basis that SID numbers are protected from disclosure under the RTKL. Requestor filed an appeal with the OOR challenging the partial denial. The OOR denied Requestor's appeal because section 708(b)(6)(i)(A) of the RTKL, 65 P.S. §67.708(b)(6)(i)(A), exempts confidential personal identification numbers from public disclosure, and, under 204 Pa. Code §213.73(8), the SID numbers in the electronic case records of Magisterial District Courts are expressly made confidential.

On appeal to this court,<sup>3</sup> Requestor contends that SID numbers are not exempt from disclosure under the RTKL. We disagree.

Requestor argues that his SID number should not have been redacted because SID numbers are readily available by other means. In support of this argument, Requestor's brief includes photocopies of his own and several other inmates' DC16E Sentence Status Summaries, all of which plainly display their SID

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<sup>2</sup> A SID number is a "unique number assigned to each individual whose fingerprints are placed into the Central Repository of the State Police." 37 Pa. Code §58.1.

<sup>3</sup> Our standard of review of a final determination of the OOR is similar to *de novo* review. *Bowling v. Office of Open Records*, 990 A.2d 813, 818 (Pa. Cmwlth. 2010). In reviewing OOR determinations, this court is to function as a trial court, subjecting the matter to independent review, not limited to the rationale offered in the OOR's written decision. *Id.* at 820. Therefore, "we will enter narrative findings and conclusions based on the evidence as a whole, and we will explain our rationale." *Id.*

numbers.<sup>4</sup> We are not persuaded. The RTKL governs **public** access to information, not an individual's access to his or her own information. As the OOR stated, a person's SID number is exempt from disclosure **to the public** by section 708(b)(6)(i)(A) of the RTKL and 204 Pa. Code §213.73(8) as a confidential personal identification number.

Although Requestor may find it odd that he cannot obtain his SID number through a RTKL request but can obtain it through other means, we disagree with Requestor that this means the DOC is in any way violating Requestor's constitutional rights or otherwise acting unreasonably. Section 708(b)(6)(i)(A) of the RTKL prohibits disclosure of confidential personal identification numbers such as driver's license numbers and social security numbers to the **public**; however, there are, of course, other means through which an individual may properly obtain his or her **own** confidential information.<sup>5</sup> We therefore believe that the DOC's open-records officer did its best to assist Requestor and did not violate Requestor's rights or otherwise act unreasonably.

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<sup>4</sup> The DOC argues that Requestor's exhibits have not been properly made part of the record and, pursuant to Pa. R.A.P. 1951(a), should not be relied upon to adjudicate this matter. While we do not believe that Requestor's exhibits are necessary to disposition of this case, we nonetheless note that this court has the broadest scope of review in reviewing OOR decisions, and, in our role as fact finder in reviewing OOR cases, we are not restricted from considering information beyond the certified record. *Bowling*, 990 A.2d at 822-23.

<sup>5</sup> In this case, the open-records officer properly noted that Requestor's concerns would have been better addressed under the procedures enumerated in the Criminal History Record Information Act (CHRIA), 18 Pa. C.S. §§9101-9183. The open-records officer even provided Requestor with the address for the Pennsylvania State Police Central Repository so that Requestor could pursue his rights under the CHRIA.

Accordingly, we affirm.

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ROCHELLE S. FRIEDMAN, Senior Judge

