



STATE OF CONNECTICUT
STATE DEPARTMENT OF EDUCATION



Series 2007-2008

Circular Letter: C-10

TO: Superintendents of Schools

FROM: Mark K. McQuillan, Commissioner of Education

DATE: December 17, 2007

SUBJECT: Removal of Social Security Numbers on Health Assessment Records (HAR-3)

This letter serves as a reminder to all public school districts on the need to maintain student health information in a secure and confidential manner in accordance with Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. §1232g; Health Insurance Portability and Accountability Act (HIPAA), Public Law 104-191; and other relevant state statutes.

In light of the public's clear concerns regarding the need to ensure the privacy of all Connecticut's residents, including students, the Connecticut State Department of Education (CSDE) has recently reviewed the need to collect student social security numbers on the Health Assessment Records (HAR-3). The Public School Information System (PSIS), which is implemented throughout all Connecticut schools, uses a State Assigned Student Identification (SASID) number; therefore, the practice of collecting social security numbers on the HAR-3 form is no longer necessary and the future HAR-3 form will be revised to remove the social security number.

Although the social security number will not appear on the new HAR-3, forms on file in the Cumulative Health Record (CHR) for all students will still contain social security numbers and other private information. Therefore, we are reminding you about the importance of keeping this information confidential. We recommend:

- Personally identifiable health information be maintained in a secure and confidential manner within the CHR and health room;
- In accordance with FERPA and other state statutes, confidential information in the CHR is **only** shared with other school personnel **when there is a legitimate educational interest**;
- Legitimate educational interest should be determined by each school district;
- If confidential information is shared outside of the school, appropriate release of information authorizations are obtained from parents/guardians as required;
- In general, the HAR-3 and other written medical records should not be copied and shared with other school personnel; and

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- If copies of written medical records (i.e., HAR-3) are shared with other school personnel, such as the athletic director, **the social security number should be redacted** on the copy provided to that person.

If you have any questions regarding this information, please contact Cheryl Resha, Ed.D., R.N., Bureau of Health/Nutrition Services and Adult Education, at 860-807-2108 or cheryl.resha@ct.gov

MKM:cr
cc: School Nurse Supervisors