



**Connecticut Department of Public Health**

**Testimony Presented Before the Public Health Committee  
March 16, 2015**

**Commissioner Jewel Mullen, MD, MPH, MPA  
860-509-7101**

**Senate Bill 6891-- An Act Concerning Access to Birth Records by School Superintendents**

The Department of Public Health (DPH) opposes House Bill 6891. HB 6891 proposes to amend C.G.S section 7-51 to give public school superintendents access to birth certificates of students enrolled within their school districts.

Birth records are created and maintained for three main purposes: 1) to establish legal identity or satisfy other legal requirements, 2) to provide data for medical and scientific research and public health surveillance, and 3) to allow for genealogical research. School superintendents would not be using birth certificates for any of these purposes. Giving school superintendents access to the actual birth certificate of every child who is enrolled in the district is unwarranted. Currently, parents are required to submit a birth certificate to the school to enroll their child, so such certificate is already on record. The onus of obtaining a child's birth certificate and submitting it to the school should remain with the parents.

Over the years the Department has received birth data requests from school superintendents for two reasons. The first is for school enrollment projections which the Department satisfies by providing non-identifying statistical data. The second purpose involves re-districting within the town. These requests are fulfilled by providing a few data elements, such as the date of birth of the child and residential address information. This process provides the superintendent with the necessary data to assess re-districting, while also giving the Department control over the data by requiring its destruction after it is no longer needed.

Birth certificates contain personal identifying information as well as protected health information that should not be disclosed without a sufficient purpose. Strict protections are placed on the disclosure of birth records due to the confidential information which they contain, as well as the potential for the records to be used for imposter fraud and other nefarious purposes. Additionally, the "minimum necessary standard" as put forth in federal law and guiding principles for protecting health information, requires that such information not be

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disclosed unless it is necessary to satisfy a particular purpose or carry out a function. By providing birth certificates to school superintendents, the “minimum necessary standard” will be violated. Providing actual birth certificates rather than the necessary data elements, as would be the case under this proposal, gives school superintendents unwarranted access to personal identifiers and protected health information.

Thank you for your consideration of the Department’s testimony.