

September 18, 2020

Dear Parents,

This communication is to make you aware of **new guidance** collaboratively created between the Iowa Department of Public Health and the Iowa Department of Education (attached) in regard to information sharing in relation to COVID-19. All data will be shared transparently and aligned with the Family Educational Rights and Protection Act (FERPA) as well. Please note, FERPA legislation protects students, not staff. In consultation with Page County Public Health and our CCSD school nurse, we continue to take the appropriate safety measures for our students.

It is critical to understand the sensitive, confidential and legal nature of sharing personal information. Thus, positive case or quarantine data **will not** be released per classroom or grade level. In terms of activities or athletics, it **is acceptable** to share “the football team” is in quarantine; however, sharing the “JV football team” is in quarantine **is not acceptable**. In addition, **no other demographic identifiers** (gender, blonde hair, “area” of residence, etc.) **can be** included in any release of information.

Data **will be released** in accordance with the provisions listed on the attached guidance. With that shared, the “number” the CCSD chooses to follow must meet the following scenario: If a person with no prior information could reasonably determine the personal identity of a student with a “positive” test, the number is too low. As we are a rural district with lower numbers of students, our number of cases to share information is **30** (rather than 6). This decision is made to find the appropriate balance of protecting the public while protecting the privacy of individual students and staff, as well as the health of the educational community as a whole.

At this time, it is important to note there are **zero cases** of positive test cases within our school district! Thank you for wearing your facial coverings. We have had several complimentary communications regarding our spectator guidelines from other communities. Unfortunately, we were one of the first school districts in the area to face quarantines, and others are just recently being impacted. While continuing to wear facial coverings is important, wearing them correctly is even more critical. Be certain to cover your nose, mouth and chin at all times. Thank you for keeping others safe!

When digesting data, it is key to make a distinction between **positive cases and quarantines**. Quarantine guidelines for students in athletics and activities are being created as an additional safety measure and will be added to the District Good Conduct agreement. In order to participate in activities/athletics when returning to school, students must follow the quarantine guidelines. Please watch for more information from Mr. Porter.

We have had questions regarding attendance procedures in relation to quarantine. Students in quarantine are **required** to follow school district guidelines and complete assigned work accordingly.

Dealing with sensitive, confidential information is not new to the educational world. The Family Educational Rights and Privacy Act (FERPA) speaks to “need to know” information. **ONLY** persons with legitimate educational need to a student’s personal information, whether is it health, academic, residential, etc. in nature, should receive such information. For example, if a teacher, administrator, or other staff member has knowledge of a student’s positive testing status, he or she cannot (by law) share with any 3rd party. This means, information should not be shared with family members, neighbors, teachers in other buildings, etc. The **district** has a responsibility and is liable for such a breach; and, **any staff member** revealing such information bear legal liability as well. Thank you for respecting our staff’s duty to FERPA.

Please know that any CCSD communication prior to today (September 18, 2020) is hereby redacted.

~Chris Bergman, CCSD Superintendent