

CONNECTICUT INTERSCHOLASTIC ATHLETIC CONFERENCE

Policy Regarding Confidentiality of Information Relating to Student-Athletes, Member Schools, Sports Officials and Other Adults

CIAC respects and seeks to protect the legitimate privacy interests of student-athletes. The following policy outlines what student-athlete information one should expect to provide to CIAC and how CIAC handles the use and disclosure of such information. The policy further sets forth how information relating to member schools, CIAC-registered officials and other adults will be handled by CIAC.

1. **Student-Athlete Information**

CIAC regularly requires production of certain factual information needed to determine athletic eligibility of students and/or to enforce the CIAC Constitution, By-laws, Policies and Procedures, and Rules and Regulations. The information includes both public and personal private student information. Such information routinely includes the student's (1) name; (2) home address; (3) age and date of birth; (4) academic records; (5) attendance records; and (6) information relating to a student's participation in interscholastic athletic competition. In some instances, CIAC may require certain health, other records of students and/or financial records of parents/guardians.

- a. **General Policy** -- It is CIAC policy that personal private information concerning student-athletes, provided by students or schools for the purpose of determining the eligibility of a student and to enforce the CIAC Constitution, By-laws, Policies and Procedures, and Rules and Regulations, shall, unless a waiver of disclosure is provided by the student or the student's parent(s) if the student is under the age of 18, be limited to such purposes and shall not be disclosed to persons not properly involved in the handling of the matter.

The name of the student, the name of the student's school, the eligibility rule at issue, and the mere finding of eligibility or ineligibility are not considered confidential.

- b. **Confidentiality Prior To, and During, Eligibility and Disciplinary Proceedings**

- 1) **Initial Consideration of Eligibility Matters**

On agendas of meetings and notices of special meetings to consider eligibility matters, the CIAC shall identify the name of students whose eligibility is in question, the name of the students' schools, and the eligibility rule(s) at issue.

Documents submitted to the CIAC in support of or opposing the eligibility of a student, and which contain personal private information about a student, should not be disclosed to third parties without approval of the student or, if the student is under the age of eighteen (18), the student's parent(s).

Where there is no dispute concerning the eligibility of a student or group of students, the CIAC shall, in open session, approve requests for determination of eligibility without discussion of particular circumstances. Where, however, there is any question of eligibility and consideration of the particular circumstances requires discussion of personal private information, such discussion should occur in executive session. Action taken merely to schedule an eligibility hearing should be taken in public session.

2) **Conduct of Eligibility Hearings**

During eligibility and disciplinary hearings, when a student, the student's family, and/or the student's school, anticipates that personal private information relating to the student-athlete and/or the student's family or others may be disclosed, the student, the student's family, and/or the student's school may request that the all or parts of the matter be closed to persons not involved in the hearing or affiliated with CIAC. Absent objection, and under normal circumstances, the presiding officer should honor such request.

If any person objects to closure of the hearing, the presiding officer shall consider the merits of the respecting positions and determine whether complete or partial closure of the matter is appropriate. In reaching such decision, the presiding officer shall carefully consider the privacy interests of students as the primary factor to be weighed, but shall take into account a general goal of openness of proceedings. Where closure is deemed appropriate, and it is feasible to do so, the presiding officer should limit closure to those parts of the hearing where personal private information of the student or the student's family is likely to be disclosed.

3) **Disclosure of Eligibility, Disciplinary, and Other Decisions**

Copies of correspondence, minutes of CIAC meetings, and other documents merely stating the determination of eligibility or ineligibility shall be freely disclosed to others. Copies of correspondence and other documents setting forth rationales for decisions may be disclosed unless such documents include discussion of personal private information of students and/or their families or others, in which case such documents shall be sent only to (1) the student-athlete; (2) appropriate representatives of the school(s) involved in the proceeding; (3) the student's and school's

legal counsel, if identified; (4) members of the Board of Control; (5) appropriate members and employees of the relevant District Committee(s); (6) the CIAC administrative staff; and (7) legal counsel for CIAC. Other persons may receive copies of such correspondence upon approval of the CIAC Executive Board (officers of CIAC).

CIAC may publish, on its websites, minutes and newsletters, the following: (1) the name of the student whose eligibility was in question; (2) the name of the student's school; (3) the eligibility rule at issue; and (4) the finding of eligibility or ineligibility. Where such information is provided, no discussion of the circumstances of the student's situation or the reasons or rationale for the decision shall be provided. For the benefit of the CIAC membership, summaries of the recommendations and rationales may be posted on its websites, minutes and newsletters, provided that no personal private information of the student, the student's family, or others, is disclosed.

Except as stated above, absent approval of the CIAC Executive Board, the CIAC administrative staff, Board of Control, and CIAC legal counsel shall treat personal private information of students, their families and others, including individual student records and letters setting forth rationales of decisions as confidential. All inquiries should be directed to the affected school(s). Upon request, the CIAC Executive Board may, in its discretion, authorize the disclosure of the rationales of the Board of Control or Board(s) of Appeal provided that such disclosure does not include personal private information of a student.

Any of the restrictions on disclosure set forth above may be waived upon consent of the student or, if the student is under the age of eighteen (18), the parents of the student, whose eligibility is at issue.

- c. **Information Relating to Athletic Performance of Students** -- CIAC regularly obtains or develops information related to the athletic performance of student-athletes who participate in CIAC-sponsored interscholastic athletic competition. As such performances occur in a public setting and cannot be considered confidential, such information will not be treated as confidential.

2. **Information Concerning Member Schools and Adults**

- a. **General Policy** -- It is CIAC policy that, as a general matter, information concerning (1) member schools; (2) personnel and representatives of member schools; (3) CIAC-registered officials; and (4) other adults, may be freely used and disclosed by CIAC with no restrictions. Exceptions to this general approach are set forth below.
- b. **Confidentiality During Hearings** -- Where actions may be taken against a

school or its personnel, or CIAC-registered officials, pursuant to the provisions of the CIAC By-laws, the school or adults involved may request that all or parts of the matter be closed to persons not involved in the hearing or affiliated with CIAC. Under normal circumstances, and if no objection is made, such request may be honored by the presiding officer when potentially criminal conduct or the employment of member school coaches or other employees may be at issue. In other instances, the presiding officer should be reluctant to close the hearing.

If any person objects to closure of any part of the hearing, the presiding officer shall consider the merits of the respecting positions and determine whether complete or partial closure of the matter is appropriate. In reaching such decision, the presiding officer shall weigh the privacy interests of member school personnel and the legitimate interest of CIAC members and the public in knowledge of enforcement of the CIAC Constitution, By-laws, Policies and Procedures, and Rules and Regulations. Where closure is deemed appropriate, and it is feasible to do so, the presiding officer should attempt to limit closure.

- c. **Disclosure of Disciplinary and Other Decisions** -- Copies of correspondence, minutes of CIAC and other documents merely stating the determination of eligibility or ineligibility shall be freely disclosed to others. Copies of correspondence and other documents which include discussion of personal private information of individuals or information which relates to possible criminal matters and/or employment disciplinary matters shall be sent only to (1) appropriate representatives of the school(s) involved in the proceeding; (2) the school's legal counsel, if identified; (3) members of the Board of Control; (4) appropriate members of the relevant CIAC Committee(s); (5) the CIAC administrative staff; and (6) legal counsel for CIAC. Other persons may receive copies of such correspondence upon approval of the CIAC Executive Board.

For the benefit of the CIAC membership, CIAC may publish, on their respective websites, minutes and newsletters, summaries of the decisions and rationales, provided that personal private information of individuals and information which relates to possible criminal matters and/or employment disciplinary matters is not published.