

January 29, 2004

To: Lenders/Holders/Servicers Participating in the Health Education Assistance Loan (HEAL) Program

Subject: HEAL Privacy Requirements - New Bankruptcy Court Privacy Requirements
Lender Policy Memorandum L-2004-2

The purpose of this policy memorandum is to notify HEAL lenders/holders/servicers of the Department of Health and Human Services (DHHS), HEAL Program new privacy requirements of all filings made in Bankruptcy Courts as of December 1, 2003. These requirements affect all filings, including proofs of claim and transfers of proofs of claim.

To protect the privacy of debtors, all documents filed with the Bankruptcy Courts must redact portions of personal identifiers. These personal identifiers include:

Social Security Number: Use only the last four digits of a social security number, e.g., XXX-XX-3448.

Names of Minor Children: Use only the initials and last name of a minor child, e.g., J.M. Smith.

Date of Birth: Use only the year, e.g., XX/XX/2004.

Financial Account Numbers: For bank or other personal financial accounts, use only the last four digits of the account, e.g., XX-XXXXXXXXX4006.

It is the responsibility of the creditor/lender filing the documents, not the Bankruptcy Court or DHHS, to apply these changes to court filings. Failure to comply with these requirements may result in the Bankruptcy Court rejecting the filing as defective.

If you have any further questions concerning this policy memorandum, please contact Ms. Audrey Darden-Willis at 301-443-9353.

Henry Lopez, Jr.
Director
Division of Health Careers Diversity and Development