Ride the Wave!
Implementing the HSPPS: *A deeper dive*

Data Management
Maintaining, Using, and
Securing Quality Data

OHS Winter
Regional T/TA Professional Development Meeting

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Professional Development Meeting

Who is with us today?
- Directors
- Ed Coordinators
- Family Service Coordinators
- Teachers
- IT Coordinators
- Others

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Objectives

In this session participants will:

- Explore how programs can effectively collect, maintain, use, and share quality data
  - Review components of a data management plan
  - Discuss how to secure and protect confidential information
- Consider a systems approach to data management

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§ 1302.101 (b) Coordinated Approaches

At the beginning of each program year, and on an ongoing basis throughout the year, a program must design and implement program-wide coordinated approaches that ensure:

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§ 1302.101 (b) Coordinated Approaches (continued)

(4) The management of program data to effectively support the availability, usability, integrity, and security of data. A program must establish procedures on data management, and have them approved by the governing body and policy council, in areas such as quality of data and effective use and sharing of data, while protecting the privacy of child records in accordance with subpart C of part 1303 of this chapter and applicable federal, state, local, and tribal laws.

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Child records (Definitions - § 1305.2)

Child records means records that:

1. Are directly related to the child;
2. Are maintained by the program, or by a party acting for the program; and
3. Include information recorded in any way, such as print, electronic, or digital means, including media, video, image, or audio format.

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Data Management Procedures

A data management plan includes procedures such as:

- Documents how data will be collected and used
- Ensures and maintains the quality of the data
- Creates protocols for reviewing the accuracy and clarity of data
- Establishes how long data will be stored
- Describes procedures for destroying data

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Components of a data management plan effectively support:

- Data availability
- Data usability
- Data integrity
- Data security

From 1302.101(b)(4)

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Stakeholder Roles in Data Management

- Governing board/Tribal Council or Policy Council member
- Center/program director
- Parents
- Teacher/home visitor
- IT Manager
- Data manager/data

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Essential Governance Processes: Reporting

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Essential Governance Processes: Reporting

- **HHS secretary communication**
- **Financial statements**
- **Program information summaries**
- **Ongoing monitoring results****
- **Data on school readiness goals****
- **Enrollment**
- **USDA**
- **Financial audit**
- **Self-assessment**
- **Community assessment**
- **PIR**

** Added from 2016 HSPPS

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DATA SECURITY MEASURES

- **Establishes procedures for protecting data and confidential information**
- **Describes ways that data can be transferred and shared**
- **Creates rules for how data will be stored in and outside of an organization**

SECURITY BREACH

Ongoing Monitoring of the Data Management Plan: A Systems Approach

- How is data shared with the governing body/Tribal Council, Policy Council, parent committee(s), advisory committees, staff and vendors/contractors and how is PII protected?

limit the amount of PII shared while still supporting informed decision-making?

- How does the program

Head Start Management Systems Wheel
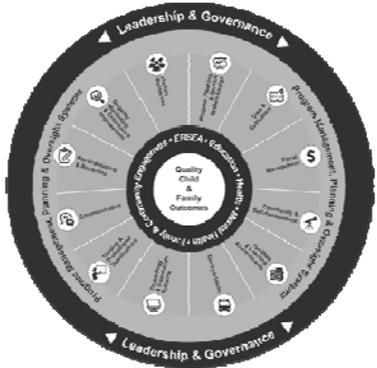
1303.20 Establishing Procedures

A program must establish procedures to protect the confidentiality of any personally identifiable information (PII) in child records.

1303.21 Program procedures – applicable confidentiality provisions

Subpart C does not apply to agencies following:

- (a) Family Education Rights and Privacy Act (FERPA) – if a program receives funds from the Department of Education

Subpart C does not apply to children under:

- (b) Individuals with Disabilities Education Act – if the program is serving children who are eligible for services under IDEA
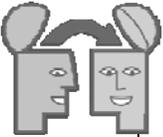
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Sharing Information

1303.22 Disclosures with, and without, parental consent.

Many data use policies and procedures are addressed in **1303.22: Disclosures with, and without, parental consent.** This standard stipulates what can be shared and who has access to the data.
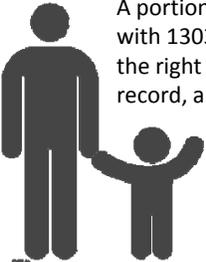
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1303.23 Parental Rights

A portion of *Data Availability* has to do with 1303.23, parental rights. A parent has the right to request access to their child's record, amendment of the record, a hearing on the contents, a copy of the record and to review any written agreements concerning their child.

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1303.24(a) A program must maintain child records in a manner that ensures only parents, and officials within the program or acting on behalf of the program have access, and such records must be destroyed within a reasonable timeframe
after such records are no longer needed or required to be maintained.

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1303.24(b) A program must maintain, with the child records, for as long as the records are maintained, information on all individuals, agencies, or organizations to whom a disclosure of PII from the child records was made (except for program officials and parents) and why the disclosure was made. If a program uses a web-based data system to maintain child records, the program must ensure such child records are adequately protected and maintained according to current industry security standards.

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1303.24(c) If a parent places a statement in the child record, the program must maintain the statement with the contested part of the child record for as long as the program maintains the record and, disclose the statement whenever it discloses the portion of the child record to which the statement relates.

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Who is responsible for safeguarding PII?

- Governing body/Tribal Council (legal and fiduciary responsibility)
- Policy Council
- Head Start director
- Head Start managers
- Head Start staff
- Others? (service providers, contractors. Etc.)

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Thinking about PII

- Is PII all the same?
- How could we assess PII?
- How does the amount of information make a difference?
- How do these questions inform policies and procedures?

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Human Resources

- What do your human resources policies and procedures state about safeguarding PII?
- Are there specific Head Start concerns that are not covered in your human resource policies and procedures regarding PII?
- If necessary, what areas would require an addendum?

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Technology & Information Systems

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- How is information stored on computers, databases, removable drives, cloud services, and other electronic forms protected?

- How is access to PII limited to need-to-know individuals?

- Does your program use encryption, password protection, and other security measures? What are they?

- When and how is PII purged from electronic systems when no longer necessary?

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Training on Data Management

- How does the program train staff and the governing body on data management?

- Does the program require PII training before granting access to child files?

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Scenario

- Review the scenario, Safeguarding PII – A Deeper Look.

- In groups, review and answer the questions following the scenario.

- Discuss in your group if your organization has policies, procedures, and or technology to address the concerns raised by the questions. Are there areas for improvement?

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Resources

- Resources to Support the Use and Linking of Data in Early Care and Education Program.
https://aspe.hhs.gov/sites/default/files/pdf/207826/ResourcesList.pdf

- Data direction 1: Creating and managing a data governance entity.
https://aspe.hhs.gov/sites/default/files/pdf/207851/DataDirection1DataGovEntity.pdf

- Data Direction 2: Discussing Data with Families
https://aspe.hhs.gov/sites/default/files/pdf/207856/DataDirection2DiscussingData.pdf

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ADMINISTRATION FOR CHILDREN & FAMILIES