Bear River Head Start Program Data Protection Policies

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Bear River Head Start

Company Data Protection Policy

Updated: 10/22

Our BRHS Company Data Protection Policy refers to our commitment to treat information of employees, clients, stakeholders and other interested parties with the utmost care and confidentiality. This policy refers to all parties (applicants, employees, clients, consultants, vendors, etc.) who provide any amount of information to us.

As part of our program operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable, such as, names, addresses, social security numbers, financial data, etc.

It is the policy of BRHS, while conducting program functions, to properly manage all program data. Data quality and integrity will be upheld by:

- Maintaining effective internal controls that comply with federal statutes, regulations and terms and conditions of the federal awards. Compliance is evaluated and monitored on an ongoing basis. The system of internal control is closely examined each year by an independent auditor.
- Adhering to all program policies, procedures, internal controls and separation of duties so that no one person has access to all financial operations, procedures, and records.
- Intentionally gathering, analyzing and reporting relevant data, in a usable format to the management team, Budget Committee, Governing body and Policy Council members on a periodic basis.
- Controls will be in place to take reasonable measure to safeguard personally identifiable information or other information the awarding agency designates as sensitive regarding privacy and obligations of confidentiality. Personally identifiable information is kept in secure locations and only used for official purposes, by appropriate staff, on a need to know basis.
- The number of individuals with access to personally identifiable information will be kept to a minimum. (i.e. bank signers)
- Per the Non-Staff Background Check policy, BRHS may require background checks as defined in 1302.90 of the Head Start Performance Standards, for contractors, consultants, and volunteers with direct access to highly sensitive information, liability or fiscal responsibilities. These individuals will also be asked to sign and adhere to the BRHS Confidentiality Procedure.
- Per the Non-Staff Background Check policy, Board Members will be required to complete a background check as defined in 1302.90 of Head Start Performance Standards if the Board Member is listed as a bank signer on the BRHS bank account and signs checks.
- Electronic and web-based data will be protected and maintained according to current industry security standards. Reasonable measures will be taken to protect electronic and online data from cyberattacks. (i.e. employee training on privacy and security measures, passwords, using security hard and software).
- Electronic information that contains personally identifiable information will only be sent in secure ways. (i.e. secure uploads, etc.).
- If a program official or auditor, acting for the program, or in the event of an audit, needs access to an employee file, the individual will sign-in to the file on a sign-in sheet. The sign-in sheet contains the name of the individual, the date the information was accessed and the reason the information was needed.
- Records that are no longer required or necessary will be destroyed within a reasonable timeframe. (Records are usually retained for a period of seven years from the date of last use to comply with Head Start, and Federal and State requirements).
- Identifying the risk of collecting, handling and storing personally identifiable information and have cost-effective insurance for those identified risks. The grantee is required to submit proof of appropriate coverage in its initial application for funding.
- Failure to follow the BRHS Company Data Protection Policy may result in disciplinary action per BRHS Employee Policies.

Bear River Head Start Child Plus Data Management Policy

Executive Statement

Prepared by ReNae Torbenson, Homebased Coordinator

Attached is the BRHS Child Plus Data Management Policy for review and approval.

Bear River Head Start- Child Plus Data Management Policy 26-27

Performance Standard 1303.24 Maintaining Records

(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.

(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.**

(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.

Bear River Head Start uses the Child Plus (by Procare Solutions) online data management system to maintain child, family and health information of enrolled children and families, including a limited amount of information on staff. This information can include: application and enrollment data, child and family outcomes, lesson plans, parent-teacher communications, child and pregnant woman health data and mental health. Child Plus/Procare uses state of the art security measures to ensure the protection of data. (For specifics on the agency's protection of health information see *Privacy of Health Records Policy*.) Specifics on Child Plus's security and privacy standards may be found here: https://www.procaresoftware.com/trust-security-compliance/

Bear River Head Start uses appropriate internal controls within Child Plus to provide security and confidentiality for child and family data. These measures include:

1. All staff sign the program's Confidentiality Policy annually, the violation of which may result in termination.
2. Child Plus Security settings and controls are overseen by a limited number of management and fiscal staff.
3. All staff using Child Plus are required to have a strong password in order to log in.
4. Staff are assigned to a User Security Group, with access limited to those areas of Child Plus that are necessary for them to be able to do their job.
5. All activity within Child Plus is dated and logged. Supervisors monitor activity within Child Plus for their teams.
6. A user is automatically logged out after 60 minutes of inactivity.
7. Staff members who leave the agency are inactivated and locked out of the system.

Executive Summary
Procedures for Privacy of Health Records
Prepared by: Cherie Pierce

Bear River Head Start ensures that health documentation is kept confidential in accordance with the HIPAA privacy rule. All health information collected by program staff is to be kept confidential and shared only on a "need to know" basis. Documentation is stored on the ChildPlus database and only accessible to staff that are assigned to that record.

PROCEDURES FOR PRIVACY OF HEALTH RECORDS
BEAR RIVER HEAD START

PS: 1302.40 & 1303.24

Bear River Head Start collects health information on children enrolled in the program in order to:

1. Determine whether or not each child has an ongoing source of continuous, accessible health care and assist the family in accessing a source of care if necessary.
2. Determine whether the child is up-to-date on a schedule of age appropriate preventive and primary health care, which includes medical, dental and mental health and assist parents in making the necessary arrangements to bring the child up-to-date if needed.
3. Ensure that children continue to follow the recommended schedule of well child checks.
4. Identify any new or recurring medical, dental, or developmental concerns so that appropriate referrals can be made quickly.
5. Track the provision of health care services.
6. Obtain or arrange further diagnostic testing, examination, and treatment for each child with an observable, known or suspected health or developmental problem.
7. Develop and implement a follow-up plan for any identified conditions so that needed treatment can begin.
8. Provide assistance to parents, as needed to enable them to learn how to obtain any prescribed medications, aids or equipment for medical and dental conditions.
9. Identify each child's nutritional needs, including nutrition related assessment data (height, weight, and hemoglobin/hematocrit).

In accordance with HIPAA standards, Bear River Preschool Head Start will protect the privacy and confidentiality of all health related information by:

1. Obtain a "Release of Information" form for each participant in the program, signed by the parent/guardian.
2. Limiting the sharing of health related information within the agency to a "Need To Know" basis. The Health and Wellness Team are the only staff members authorized to accept forms faxed by health care providers and track the provision of services.
3. Health related information is stored in the ChildPlus Database under the "Attachments" tab (see Bear River Head Start Child Plus Data Management Policy). Physical copies are held for the current school year and kept in a locked filing cabinet. The only people with access to the locked files are Head Start employees.
4. Requiring all Bear River Head Start staff to sign a confidentiality agreement when they are hired and enforcing the agency policy that states that breaking confidentiality can result in termination of employment.