

# TITLE V DATA INTEGRATION TIP SHEET: DATA PRIVACY AND SECURITY

Before integrating data into Early Childhood Integrated Data Systems (ECIDS), Title V programs should review the ECIDS data privacy and security plan. Data privacy and security ensure that data are used appropriately and protected against unauthorized access or use according to the agreed upon purposes. The ECIDS data privacy and security plan encompasses all the policies, procedures, and practices addressing the accuracy, reliability, and availability of agreed upon data.

- ✓ Before integrating Title V data into an ECIDS, identify which federal privacy laws, rules, and regulations apply to the data elements being shared (e.g. FERPA, HIPAA, state privacy or procurement laws, local regulations).
- ✓ Title V programs should consult with their procurement staff and/or legal staff to ensure compliance with all applicable federal, state, and local laws and regulations, including when, if ever, parental consent and notification are required prior to disclosing data.
- ✓ Title V programs should ensure the ECIDS has a comprehensive security framework including administrative, physical, and technical procedures for addressing data security issues (such as data access and sharing restrictions, strong password management, regular staff screening and training, etc.).
- ✓ Data sharing agreements should include the purpose and scope for integrating Title V data, the duration for sharing data, the data elements being disclosed, the frequency of the disclosure, and how the data will be destroyed when they are no longer needed.
- ✓ Title V programs should regularly review the ECIDS documented policies and procedures regarding data governance and the data management lifecycle ensuring an up-to-date plan for the collection, management, storage, transmission, use, reporting, and destruction of Title V data in a way that preserves privacy and ensures confidentiality and security.
- ✓ Title V programs should require, in writing, the right to audit the ECIDS to ensure the policies, procedures, and practices protecting data are being followed.

## Data Privacy and Security Resources and Tools

- [Privacy Technical Assistance Center](#)
- [Family Educational Rights and Privacy Act \(FERPA\)](#)
- [Health Insurance Portability and Accountability Act \(HIPAA\)](#)
- [Complying with Children's Online Privacy Protection Rule](#)