

## Snohomish County ECEAP Confidentiality Policy

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### Purpose

The purpose of this policy is:

- 1) To ensure to ensure the security and confidentiality of all child and family information.
- 2) To ensure that the transmission of all confidential child and family information is secure unless written, informed parent consent is obtained before releasing information, except as required by law.
- 3) To establish confidentiality policies and procedures to ensure that all Snohomish County ECEAP and subcontractor staff follow the same protocol with regard to confidential information

### Policy

Snohomish County ECEAP is committed to ensuring the security and confidentiality of all child and family information. Signed releases of information will be obtained before sharing any confidential information, and confidential information will not be included in emails to any entity outside of the secured network of either the subcontractor or County unless using encrypted email. Family members may have access to child and family records as requested.

### Procedures

#### Communicating Identifying Child Information

1. This procedure applies to all ECEAP emails and/or email attachments that are sent:
  - a. Externally to any outside individuals or organizations, including Snohomish County, unless using encrypted email.
  - b. Internally within your site program and agency/district if your email is **not** incorporated into a secured network system (requires User ID and password to access). Gmail is not a secured system.
2. Only the ELMS Child ID # may be included in emails and/or email attachments.
3. No identifying child information can be included in emails. Do not use names (full or partial), initials, and/or birthdates.
4. Identifying child information (names [full or partial]), initials, and/or birthdates) must be communicated by fax or direct phone conversation (not voice mail).
5. If you do not have an ELMS Child ID #, communicate identifying information (name and birthdate) via fax or direct phone conversation (not voice mail).

#### Communicating Identifying Parent/Guardian Information

1. This procedure applies to all:
  - a. Externally to any outside individuals or organizations, including Snohomish County, unless using encrypted email.
  - b. Internally within your site program and agency/district if your email is **not** incorporated into a secured network system (requires User ID and password to access). Gmail is not a secured system.
  - c. Parent/guardian information regardless of whether the parent/guardian is willingly providing their information (i.e., registering for an event or adding their name to a sign-in sheet).
2. No identifying parent/guardian information can be included in emails and/or email attachments. Do not use names (full or partial), initials, and/or birthdates for any

purpose, including registration for PAC or subcommittee meetings or events such as Advocacy Day and Celebrate the Successes.

3. Identifying parent/guardian information (names [full or partial]), initials, and/or birthdates) must be communicated by fax or direct phone conversation (no voicemail.)

### **Releases of Information**

Sites may utilize one or both of the following specific releases of information to obtain permission from an adult family member to share confidential information via email:

1. Snohomish County Release of Information to Obtain Interpretation Services
2. Snohomish County Consent for Release of Information – Adult Other, which includes consent to use the email feature of MyTeachingStrategies™ as well as other situations which require consent.

### **Requesting a Transfer for Enrollment Purposes**

1. Site will contact County ELMS Administrator (Program Assistant or Grants and Projects Coordinator) by direct phone call (no voice mail) or fax and provide the name of the child, child's birthdate, and parent name. If encrypted email is available, site may email the County ELMS Administrator the information.
2. County ELMS Administrator will conduct a search and/or contact the Department of Early Learning (DEL), and will either provide you approval to continue enrollment or will request that you submit *Parent Consent to Transfer ELMS Records Between ECEAP Contractors Form*.
3. Site will either fax, mail or deliver in person the *Parent Consent to Transfer ELMS Records Between ECEAP Contractors Form* to the County ELMS Administrator. If encrypted email is available, the form may be emailed to the County ELMS Administrator
4. The County ELMS Administrator will submit the transfer request in ELMS.
5. Site will receive confirmation that the child has been transferred and added to their waitlist; this email will only include the ELMS Child ID # and no identifying child information.

### **Submitting Parent Information**

1. Site will submit parent information (registrations, event sign-in sheets, referrals for ECEAP-related boards/committees) to County ECEAP staff by fax, mail, or direct phone call (no voice mail).
2. County ECEAP staff will submit parent information to ECEAP sites by fax, mail, or direct phone call (no voice mail).

### **Communicating Identifying ECEAP Staff Information**

1. All ECEAP staff names are considered to be public information and therefore may be included in emails, both internally and externally.
2. Other identifying ECEAP staff information that is confidential (birth dates, STARS ID, etc.) cannot be included in external emails and/or email attachments, unless encrypted.

### **Security of Confidential Information**

1. All hard-copy information will be maintained in locking file cabinets, with the key maintained separately from the cabinet.
2. All electronic information will be stored only on devices which require a login and password to access.

## **Disposing of Confidential Information**

1. All hard-copy information will be shredded after maintaining records in compliance with ECEAP Performance Standards G 1 – 7.
2. All electronic information will be deleted from computers, tablets, phones, etc., after maintaining records in compliance with ECEAP Performance Standards G 1 - 7 and the Deleted Items/Trash folder on the devices will be emptied regularly.

## **Applicable ECEAP Performance Standard & Snohomish County ECEAP Contract Section**

The applicable ECEAP Performance Standard states:

### ***A-13 Confidentiality***

Contractors must write a policy to ensure the security and confidentiality of all child and family information. This includes:

- Obtaining written, informed parent consent before releasing verbal or written information, except as required by law.
- Providing parents access to child and family records.
- Disposing of written records in a secure manner.
- Securing electronic records.

The applicable item in the Snohomish County ECEAP contract is the *Business Associate Agreement* (previously Exhibit H).