

## Head Start Monthly Report March 2020

### Conduct of Responsibilities –

Each Head Start agency shall ensure the sharing of accurate and regular information for use by the **Governing Body and Policy Council**, about program planning, policies, and Head Start agency operations, including:

- (A) Monthly financial statements, including credit card expenditures;
- (B) Monthly program information summaries
- (C) Program enrollment reports, including attendance reports for children whose care is partially subsidized by another public agency;
- (D) Monthly reports of meals and snacks provided through programs of the Department of Agriculture;
- (E) The financial audit;
- (F) The annual self-assessment, including any findings related to such assessment;
- (G) The communitywide strategic planning and needs assessment of the Head Start agency, including any applicable updates;
- (H) Communication and guidance from the Secretary;

### In accordance with the New Head Start performance Standards that went into effect on November 7, 2016:

1301.2 (b) Duties & Responsibilities of the Governing Body -

(1) The governing body is responsible for activities specified at section 642©(1)€ of the Head Start Act.

(2) The governing body must use ongoing monitoring results, data on school readiness goals, and other information described in 1302.102, and information described at section 642(d)(2) of the Act to conduct its responsibilities.

Please see Program Information Summary & attachments to this monthly report for monitoring reports.

#### A. Monthly Financial Statements including credit card expenditures:

##### Credit Card: \$2,273.90

2/3/2020	Dayton Airport	\$84.00	A Esser
2/3/2020	Hyatt Regency	\$1,546.10	A. Esser
2/3/2020	American	\$30.00	A. Esser
2/3/2020	Grand Cab	\$21.81	A. Esser
2/3/2020	Taxi SVC	\$8.47	A. Esser
2/7/2020	SMG Parking	\$17.50	S. Stammen
2/7/2020	SMG Parking	\$17.50	S. Stammen
2/13/2020	Hyatt Regency	\$203.34*	A. Esser
2/17/2020	Doubletree	\$260.86	A. Esser
2/24/2020	Hyatt	\$122.00	A. Esser
2/24/2020	Hyatt	\$122.00	S. Stammen
2/24/2020	Hyatt	\$122.00	J. Bell
2/26/2020	Teachstone	\$125.00	S. Stammen

#### B. Program Information Summary

The month of February was filled with many planning activities. The Education Manager is meeting with individual teaching teams to improve team building and communication skills on a regular basis. Similarly, the EM met with ESC Preschool supervisor and collaborative teaching team as part of the ongoing support plan for that specific classroom. Likewise, small team meetings with the Family Advocates were conducted throughout the month providing that staff with training on goal development and using the program's strength assessment. Recruitment meetings and discussion specific to professional development and trainings were also conducted. The Health Manager conducted random monitors for Active Supervision and follow up with mini in-services specific to classroom staff.

Programmatic partnership and collaboration meetings were conducted throughout the month. The Health and Education managers met with the new SNAP – ED provider to schedule visits to classrooms. The FESM met with Wright State University on possible placement of interns in the future at MCHS. The Education Manager and Executive Director met with Principal Michelle Duncan and Curriculum Director Vaughn Ray to discuss transitioning children from Head Start to Celina primary. The Executive Director met with the ESC Superintendent Shelly Vaughn to discuss IEP services to identified children, on-going collaboration, possible future collaborations in other school districts, and sharing information for grants both entities are applying for in the future.

The Executive Director, Education Manager, and Head teacher Jill Bell attended the 2020 ODE Literacy Summit in Columbus. Topics obviously focused on literacy, but social emotional issues were addressed as they impact a child's ability to learn. The Education Manager participated in the ODE Pre-K – 5 committee on professional development specific to curriculum.

The Executive Director spoke on Spectrum twice this month. Once promoting No Wrong Door and also promoting Head Start enrollment for next school year. Jonathan Williams filmed another excerpt on recruitment as well. The Executive Director attended the 2<sup>nd</sup> session of training on interagency agreement development with Board of DD, ESC, and FCFC provided by OCALI. The group plans to finish that work in the summer.

The Executive Director was nominated to be a member of OHSAL Executive Board as Secretary. The Executive Director is also a member of the presenting / facilitating team for the Community of Leaders / Director's group at OHSAL.

During Data Dialogue with all education staff, the Executive Director presented information on the upcoming federal review and CLASS observations. The monthly admin meeting was conducted.

As mentioned in previous monthly reports, the Office of Head Start released information stating that quality improvement dollars would be released to Head Start grantees. In response to this information, the Executive Director participated in an informational webinar explaining the usage of funds and met with administrative staff multiple times to identify areas of need. Because Congress focused so heavily on trauma informed care and the growing number of children displaying abhorrent behavior, the Executive Director contacted Diane Gable with Foundations and Alicia Bruce with ADAMAS Board to visit a Therapeutic Intervention Program (TIP) at Butler County Head Start. Future development for TIP programming is currently in planning stages at MCHS with community partners.

**Education** –Data Dialogue was conducted with education staff to work on classroom implementation plans to meet school readiness goals and objectives. Executive functioning was unearthed as a root cause to low scores in approaches to learning and social emotional development.

**Mental Health** – 46 students have been referred for MHC with more referrals coming.

**Disabilities** – 31 IEP students have been served thus far this year, there are 12 children identified as suspected to have a disability.

**Health** – In most Health outcomes reports, MCHS has seen double digit increases in preventative care since the beginning of the year til present. Unfortunately, we currently have 10 children who are need of dental follow up and cannot receive those services due to a lack of providers in the area. Sickness is the number 1 reason for absence.

**ERSEA** – Program enrollment maintains a level over 97% threshold for intervention by OHS. The program has encountered significant attendance issues.

**Family Engagement** –February’s parent engagement event was held at the local bowling alley. Head Start families bowled together and enjoyed pizza. This event continues to be huge success for our program

**C. Enrollment / Attendance**

**Enrollment by Program Option:**

Half Day PY Head Start	67
Full Day School Year Ed Complex	71
Full Day School Year Rockford	18

**Attendance by Program Option:**

Half Day PY Head Start	88.42%
Full Day School Year Ed Complex	83.77%
Full Day School Year Rockford	89.74%

**D. CACFP report – CACFP claimed meals**

Month Served	March 2020
Total Days Attendance	Rockford - 13 Part Day programming - 12 Ed Complex Full day Programming - 15
Total Breakfast	1378
Total Lunches	1744
Total Snacks	1266
Total Meals	4388

- E. Financial Audit** – completed 1/2020
- F. Annual Self-Assessment**
- G. Community Assessment**
- H. Communication and guidance from the Secretary**

**Attachments to report:**

School Readiness Report – Winter & comparison of growth from fall  
Required Health Screening Report

Respectfully submitted,

Amy Esser  
Executive Director

HEAD START - 2020 GRANT

REVENUE

	FEDERAL BUDGET	OTHER SOURCES	TOTAL REVENUES	REVENUE RECEIVED	REMAINING FUNDING
Federal Revenue	917,083.00	-	917,083.00	392,000.00	525,083.00
CACFP Revenue	-	41,583.00	41,583.00	7,807.46	33,775.54
Other Local	-	-	-	1,500.00	(1,500.00)
Refund prior year exp	-	-	-	-	-
Board advance	-	-	-	-	-
<b>Total</b>	<b>917,083.00</b>	<b>41,583.00</b>	<b>958,666.00</b>	<b>401,307.46</b>	<b>557,358.54</b>

EXPENSES

	FEDERAL BUDGET	OTHER SOURCES	TOTAL BUDGET	ACTUAL EXPENDED	EXPENDABLE BALANCE	ENCUMBERED/ REQUISITIONS	REMAINING BALANCE
Salary	420,198.00	22,902.00	443,100.00	207,635.09	235,464.91	-	235,464.91
Fringe Benefits	340,671.00	-	340,671.00	142,542.66	198,128.34	-	198,128.34
Programming	78,987.00	965.00	79,952.00	27,154.86	52,797.14	51,236.85	1,560.29
Supplies	51,856.00	28,650.00	80,506.00	20,319.37	60,186.63	24,681.77	35,504.86
Capital Outlay	-	-	-	-	-	-	-
Other Expenditures	4,739.00	-	4,739.00	1,100.00	3,639.00	75.00	3,564.00
<b>PA22 subtotal</b>	<b>896,451.00</b>	<b>52,517.00</b>	<b>948,968.00</b>	<b>398,751.98</b>	<b>550,216.02</b>	<b>75,993.62</b>	<b>474,222.40</b>

Training & Technical Services

Training & technical serv (job code 400)	419	9,617.00	9,617.00	1,426.00	8,191.00	3,422.50	4,768.50
Staff out of town travel	439	11,015.00	11,015.00	739.36	10,275.64	6,930.31	3,345.33
<b>Subtotal Purch Service</b>		<b>20,632.00</b>	<b>20,632.00</b>	<b>2,165.36</b>	<b>18,466.64</b>	<b>10,352.81</b>	<b>8,113.83</b>

Training & Tech Supplies

<b>Subtotal Supplies</b>		-	-	-	-	335.00	(335.00)
--------------------------	--	---	---	---	---	--------	----------

T&TA -PA20

		20,632.00	20,632.00	2,165.36	18,466.64	10,687.81	7,778.83
--	--	-----------	-----------	----------	-----------	-----------	----------

Return of Board Advance

		-	-	-	-	-	-
--	--	---	---	---	---	---	---

TOTALS

	917,083.00	52,517.00	969,600.00	400,917.34	568,682.66	86,681.43	482,001.23
--	------------	-----------	------------	------------	------------	-----------	------------

TOTAL REVENUE OVER/UNDER TOTAL EXPENDITURES

390.12

HEAD START - 2019 GRANT

REVENUE

	FEDERAL BUDGET	OTHER SOURCES	TOTAL REVENUES	REVENUE RECEIVED	REMAINING FUNDING
Federal Revenue	1,698,712.00	-	1,698,712.00	1,456,541.70	242,170.30
CACFP Revenue	-	88,230.00	88,230.00	103,578.77	(15,348.77)
Other Local	-	-	-	7,956.35	(7,956.35)
Refund prior year exp	-	-	-	-	-
Board advance	-	-	-	-	-
<b>Total</b>	<b>1,698,712.00</b>	<b>88,230.00</b>	<b>1,786,942.00</b>	<b>1,568,076.82</b>	<b>218,865.18</b>

EXPENSES

	FEDERAL BUDGET	OTHER SOURCES	TOTAL BUDGET	ACTUAL EXPENDED	EXPENDABLE BALANCE	ENCUMBERED/ REQUISITIONS	REMAINING BALANCE
Salary	678,779.00	50,400.00	729,179.00	678,063.89	51,115.11	-	51,115.11
Fringe Benefits	478,144.00	9,100.00	487,244.00	383,035.58	104,208.42	-	104,208.42
Programming	180,306.00	4,230.00	184,536.00	154,287.97	30,248.03	-	30,248.03
Supplies	197,284.00	24,500.00	221,784.00	236,479.16	(14,695.16)	11,097.00	(25,792.16)
Capital Outlay	99,139.00	-	99,139.00	86,139.00	13,000.00	-	13,000.00
Other Expenditures	12,125.00	-	12,125.00	2,481.80	9,643.20	-	9,643.20
<b>PA22 subtotal</b>	<b>1,645,777.00</b>	<b>88,230.00</b>	<b>1,734,007.00</b>	<b>1,540,487.40</b>	<b>193,519.60</b>	<b>11,097.00</b>	<b>182,422.60</b>
<b>Training &amp; Technical Services</b>							
Training & technical serv (job code 400)	24,319.00	-	24,319.00	11,814.50	12,504.50	-	12,504.50
Staff out of town travel	24,966.00	-	24,966.00	14,532.12	10,433.88	-	10,433.88
<b>Subtotal Purch Service</b>	<b>49,285.00</b>	<b>-</b>	<b>49,285.00</b>	<b>26,346.62</b>	<b>22,938.38</b>	<b>-</b>	<b>22,938.38</b>
<b>Training &amp; Tech Supplies</b>							
Subtotal Supplies	3,650.00	-	3,650.00	1,242.80	2,407.20	-	2,407.20
T&TA -PA20	52,935.00	-	52,935.00	27,589.42	25,345.58	-	25,345.58
Return of Board Advance	-	-	-	-	-	-	-
<b>TOTALS</b>	<b>1,698,712.00</b>	<b>88,230.00</b>	<b>1,786,942.00</b>	<b>1,568,076.82</b>	<b>218,865.18</b>	<b>11,097.00</b>	<b>207,768.18</b>

TOTAL REVENUE OVER/UNDER TOTAL EXPENDITURES (0.00)

HEAD START - 2019 GRANT

REVENUE

	FEDERAL BUDGET	OTHER SOURCES	TOTAL REVENUES	REVENUE RECEIVED	REMAINING FUNDING
Federal Revenue	1,698,712.00	-	1,698,712.00	1,468,307.79	230,404.21
CACFP Revenue	-	88,230.00	88,230.00	103,578.77	(15,348.77)
Other Local	-	-	-	7,956.35	(7,956.35)
Refund prior year exp	-	-	-	-	-
Board advance	-	-	-	-	-
<b>Total</b>	<b>1,698,712.00</b>	<b>88,230.00</b>	<b>1,786,942.00</b>	<b>1,579,842.91</b>	<b>207,099.09</b>

EXPENSES

	FEDERAL BUDGET	OTHER SOURCES	TOTAL BUDGET	ACTUAL EXPENDED	EXPENDABLE BALANCE	ENCUMBERED/ REQUISITIONS	REMAINING BALANCE
Salary	678,779.00	50,400.00	729,179.00	678,063.89	51,115.11	-	51,115.11
Fringe Benefits	478,144.00	9,100.00	487,244.00	383,035.58	104,208.42	-	104,208.42
Programming	180,306.00	4,230.00	184,536.00	154,287.97	30,248.03	-	30,248.03
Supplies	197,284.00	24,500.00	221,784.00	248,245.25	(26,461.25)	-	(26,461.25)
Capital Outlay	99,139.00	-	99,139.00	86,139.00	13,000.00	-	13,000.00
Other Expenditures	12,125.00	-	12,125.00	2,481.80	9,643.20	-	9,643.20
<b>PA22 subtotal</b>	<b>1,645,777.00</b>	<b>88,230.00</b>	<b>1,734,007.00</b>	<b>1,552,253.49</b>	<b>181,753.51</b>	<b>-</b>	<b>181,753.51</b>
<b>Training &amp; Technical Services</b>							
Training & technical serv (job code 400)	24,319.00	-	24,319.00	11,814.50	12,504.50	-	12,504.50
Staff out of town travel	24,966.00	-	24,966.00	14,532.12	10,433.88	-	10,433.88
<b>Subtotal Purch Service</b>	<b>49,285.00</b>	<b>-</b>	<b>49,285.00</b>	<b>26,346.62</b>	<b>22,938.38</b>	<b>-</b>	<b>22,938.38</b>
Training & Tech Supplies	3,650.00	-	3,650.00	1,242.80	2,407.20	-	2,407.20
<b>Subtotal Supplies</b>	<b>3,650.00</b>	<b>-</b>	<b>3,650.00</b>	<b>1,242.80</b>	<b>2,407.20</b>	<b>-</b>	<b>2,407.20</b>
T&TA -PA20	52,935.00	-	52,935.00	27,589.42	25,345.58	-	25,345.58
Return of Board Advance	-	-	-	-	-	-	-
<b>TOTALS</b>	<b>1,698,712.00</b>	<b>88,230.00</b>	<b>1,786,942.00</b>	<b>1,579,842.91</b>	<b>207,099.09</b>	<b>-</b>	<b>207,099.09</b>

TOTAL REVENUE OVER/UNDER TOTAL EXPENDITURES (0.00)

<b>439 Early Childhood</b>				Purchased		Capital		
439-9920	Salaries	Fringes	Services	Supplies	Outlay	Other	Total	
	100	200	400	500	600	800		
Original								
CCIP Budget	31,400.00	20,600.00	-	-	-	-	52,000.00	
	-	-	-	-	-	-	-	
	-	-	-	-	-	-	-	
	-	-	-	-	-	-	-	
Adjusted								
CCIP Budget	31,400.00	20,600.00	-	-	-	-	52,000.00	
Exp thru 9/30	3,781.79	2,153.86					5,935.65	
Exp thru 10/31	3,634.26	2,049.45					5,683.71	
Exp thru 11/30	3,697.49	2,140.84					5,838.33	
Exp thru 12/31	3,556.96	2,271.36					5,828.32	
Exp thru 01/31	3,642.10	3,655.68					7,297.78	
Exp thru 02/28	3,982.66	2,357.59					6,340.25	
Exp thru 03/31							-	
Exp thru 04/30							-	
Exp thru 05/31							-	
Exp thru 06/30							-	
Exp thru 07/31							-	
Exp thru 08/31							-	
Total Expenditures	22,295.26	14,628.78	-	-	-	-	36,924.04	
<b>CCIP Budget</b>								
Remaining	9,104.74	5,971.22	-	-	-	-	15,075.96	

**CAN SPEND UP TO** 34,540.00 22,660.00  
**BUDGET PLUS 10%**



ACCT. NUMBER: 5563 7579 0004 4218

CELINA CITY SCHOOLS

**COMMERCIAL ACCOUNT ACTIVITY**

CELINA CITY SCHOOLS  
5563-7579-0004-4218

**TOTAL COMMERCIAL ACTIVITY**  
\$15,310.06CR

ACCOUNTING CODE:

Post Date	Tran Date	Reference Number	Transaction Description	Amount
02-14	02-14		AUTO PAYMENT DEDUCTION	15,310.06 CR

**INDIVIDUAL CARDHOLDER ACTIVITY**

AMY ESSER  
5563-7500-2990-4743

CREDITS  
\$203.34

PURCHASES  
\$2,477.24

CASH ADV  
\$0.00

**TOTAL ACTIVITY**  
\$2,273.90

ACCOUNTING CODE:

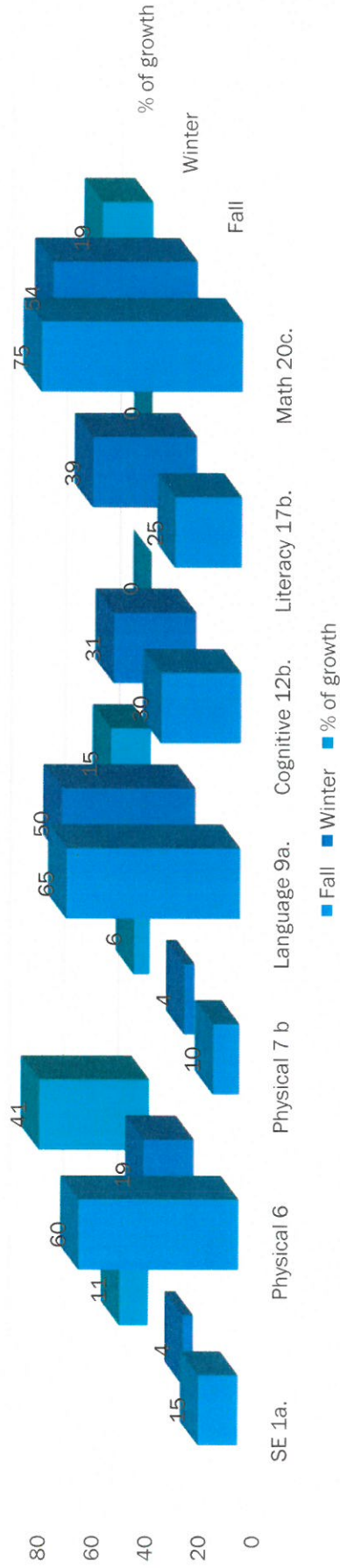
**Purchasing Activity**

Post Date	Tran Date	Reference Number	Transaction Description	Amount
02-26	02-25	55429500056637083662005	TEACHSTONE TRAINING 8669988352 VA	125.00
<b>Total Purchasing Activity</b>				<b>\$125.00</b>

**Travel Activity**

Post Date	Tran Date	Reference Number	Transaction Description	Amount
02-03	01-31	25415750032000031447970	99938 - DAYTON INTERNA VANDALIA OH P.O.S.: P77001479 SALES TAX: 2.52	84.00
02-03	01-31	55310200032722020106361	HYATT REGENCY WASHINGT WASHINGTON DC 24223245 ARRIVAL: 01-26-20	1,546.10
02-03	01-31	55417340032870320315855	AMERICAN 0010282463721 WASHINGTON NA DC ESSER/AMY DEPART: 01-31-20 P.O.S.: SALES TAX: \$0.00 EBC AA Y FEE	30.00
02-03	01-31	55432860031200066408244	SQ *GRAND CAB LLC ARLINGTON VA P.O.S.: 00023058430127234 SALES TAX: 0.00	21.81
02-03	01-31	55490400032263433461638	TAXI SVC WASHINGTON WASHINGTON DC	8.47
02-07	02-05	55547500037286888900110	SMG GCCC PARKING COLUMBUS OH	17.50
02-07	02-05	55547500037286888900128	SMG GCCC PARKING COLUMBUS OH	17.50
02-13	02-12	55310200043722000002413	HYATT REGENCY WASHINGT 8885872877 DC 0000000241 ARRIVAL: 02-12-20	203.34 CR
02-17	02-13	55310200045036006450148	DOUBLETREE BY HILTON C COLUMBUS OH 645014 ARRIVAL: 02-11-20	260.86
02-24	02-20	05436840052300226824772	HYATT PLACE OSU 614-280-1234 OH 32519858 ARRIVAL: 02-19-20	122.00
02-24	02-20	05436840052300226824855	HYATT PLACE OSU GRANDVIEW OH 32520249 ARRIVAL: 02-19-20	122.00
02-24	02-20	05436840052300226824939	HYATT PLACE OSU GRANDVIEW OH 32520248 ARRIVAL: 02-19-20	122.00
<b>Total Travel Activity</b>				<b>\$2,148.90</b>

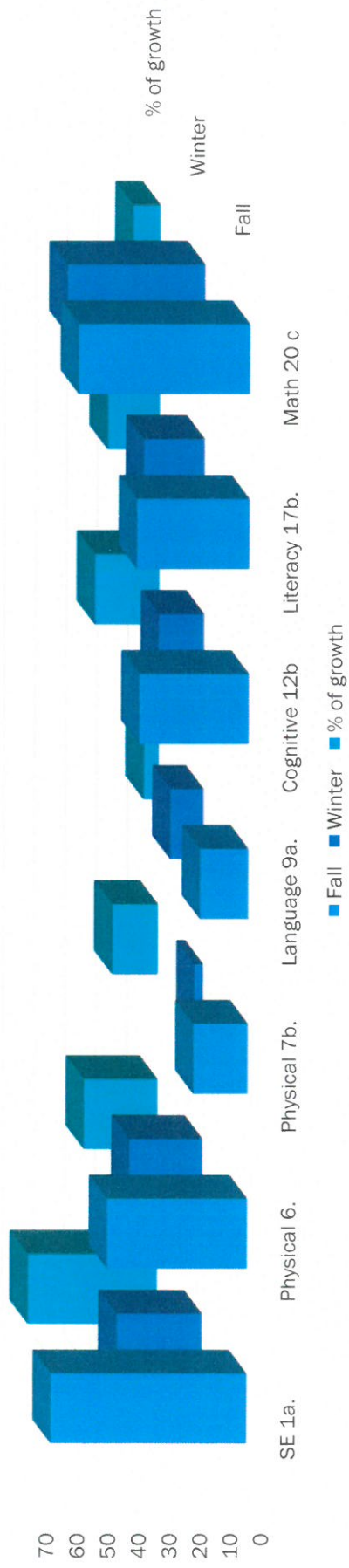
3 yo



## SCHOOL READINESS GOALS FALL WINTER COMPARISON 3 YO

How to read the chart. First row shows Fall scores per school readiness objective identifying those who were not meeting or exceeding WHE. Second row shows Winter scores per school readiness objective identifying those who were not meeting or exceeding WHE. The last row shows the percentage of growth from fall to winter. Note 12 b and 17b

Pre K



### SCHOOL READINESS GOALS FALL WINTER COMPARISON PRE K

How to read the chart. First row shows Fall scores per school readiness objective identifying those who were not meeting or exceeding WHE. Second row shows Winter scores per school readiness objective identifying those who were not meeting or exceeding WHE. The last row shows the percentage of growth from fall to winter. Note 9a 20c

+ Additional Filtering

Currently Enrolled Filter

View All

Mercer County Head Start All Sites All Classes

**Agency: All** **Currently Enrolled= 151**

**406 - EPSDT status Report**

	Up-To-Date	Not Up-To-Date
<b>Anemia (HCT/HGB) (Mandated)</b>	<u>120</u>	<u>31</u>
<b>Dental (Mandated)</b>	<u>121</u>	<u>30</u>
<b>Growth (Mandated)</b>	<u>146</u>	<u>5</u>
<b>Hearing (Mandated)</b>	<u>143</u>	<u>8</u>
<b>Lead Screening (Mandated)</b>	<u>122</u>	<u>29</u>
<b>Physical (Mandated)</b>	<u>149</u>	<u>2</u>
<b>Vision (Mandated)</b>	<u>147</u>	<u>4</u>

Up-to-Date / Not Up-to-Date on ALL Mandated Exams

Up-To-Date	Not Up-To-Date
<u>97</u>	<u>54</u>

**Notes:**

- 1- Numbers do not include unborn children
- 2- For Currently Terminated children, Up To Date status is calculated based on Termination Date ( instead of Today's date). These children are marked with a RED asterisk in sub-reports.
- 3- If Class End Date is prior to Today's date, Up To Date status is calculated based on Class End Date ( instead of Today's date). These children are marked with two RED asterisks in sub-reports.

Copyright (c) 2001-2020 by Nulinx International, Inc. www.mycopa.com

<p><b>1303 Subpart C – Protections for the Privacy of Child Records</b></p>					
<p><b>1303.20</b> <b>Establishing procedures.</b></p>	<p>A program must establish procedures to protect the confidentiality of any personally identifiable information (PII) in child records.</p>		<p>MCHS develops policy and procedure that specifically safeguards PII of child records. The MCHS personnel manual addresses the importance of confidentiality in the code of conduct.</p>	<p>Confidentiality</p>	<p>All Staff</p> <p>MCHS personnel Policy Manual Parent Handbook</p>
<p><b>1303.21</b> <b>Program procedures – applicable confidentiality provisions.</b></p>	<p>(a) If a program is an educational agency or institution that receives funds under a program administered by the Department of Education and therefore is subject to the confidentiality provisions under the Family Educational Rights and Privacy Act (FERPA), then it must comply with those confidentiality provisions of FERPA instead of the provision in this subject.</p>	<p>The purpose of this part is to set out requirements for the protection of privacy of parents and students under section 444 of the General Education Provisions Act, as amended.</p> <p>Act means the Family Educational Rights and Privacy Act of 1974, as amended, enacted as section 444 of the General Education Provisions Act.</p> <p>(Authority: 20 U.S.C. 1232g)</p> <p>Attendance includes, but is not limited to—</p> <p>(a) Attendance in person or by paper correspondence, videoconference, satellite, Internet, or other electronic information and telecommunications technologies for students who are not physically present in the classroom; and</p>	<p>MCHS practices are developed to ensure that PII is not readily disclosed or available for access to unauthorized individuals.</p> <p>Student and or family information is confidential. Paper documents are kept in locked file cabinets with access allowable to relevant staff.</p> <p>Student and family information is secure in an electronic database. The database has security measures that prevent the opportunity of “hacking” both by the provider and consumer.</p> <p>The database requires a username and password which is assigned and retracted by the Super Admin administrator for the program.</p> <p>All information is deemed confidential unless otherwise specified. As such, a release of information must be obtained prior to the release of any information to any entity.</p>	<p>Confidentiality Release of Information</p>	<p>All staff</p> <p>MCHS Personnel Policy Manual Parent Handbook</p>

	<p>(b) The period during which a person is working under a work-study program. (Authority: 20 U.S.C. 1232g)</p> <p>Authorized representative means any entity or individual designated by a State or local educational authority or an agency headed by an official listed in §99.31(a)(3) to conduct—with respect to Federal- or State-supported education programs—any audit or evaluation, or any compliance or enforcement activity in connection with Federal legal requirements that relate to these programs. (Authority: 20 U.S.C. 1232g(b)(1)(C), (b)(3), and (b)(5))</p> <p>Biometric record, as used in the definition of personally identifiable information, means a record of one or more measurable biological or behavioral characteristics that can be used for automated recognition of an individual. Examples include fingerprints; retina and iris patterns; voiceprints; DNA sequence; facial characteristics; and handwriting. (Authority: 20 U.S.C. 1232g)</p> <p>Dates of attendance. (a) The term means the period of time during which a student attends or attended an educational agency or institution. Examples</p>	<p>Parents / guardians may request a review of the record. Parent / guardians may request copies of information from the file.</p> <p>Head Start files do not include all aspects of FERPA as noted.</p> <p>Law Enforcement may have access to student's files as deemed necessary especially during investigations.</p> <p>Child protective services may have access to files while in an investigative mode.</p> <p>Federal review teams may have access to files during mandated review and oversight.</p> <p>State regulatory agencies such as Ohio Department of Education, Ohio Department of Health, etc. may review files with staff members present. Information to be reviewed is to be clearly communicated by the reviewer. Staff members are to make available only the information described in the review.</p> <p>All requests for release of review of specific child / family files are to be put into writing and directed to the Executive Director for approval / authorization.</p>		
--	--	--	--	--

of dates of attendance include an academic year, a spring semester, or a first quarter.

(b) The term does not include specific daily records of a student's attendance at an educational agency or institution.

(Authority: 20 U.S.C. 1232g(a)(5)(A))

Directory information means information contained in an education record of a student that would not generally be considered harmful or an invasion of privacy if disclosed.

(a) Directory information includes, but is not limited to, the student's name; address; telephone listing; electronic mail address; photograph; date and place of birth; major field of study; grade level; enrollment status (e.g., undergraduate or graduate, full-time or part-time); dates of attendance; participation in officially recognized activities and sports; weight and height of members of athletic teams; degrees, honors, and awards received; and the most recent educational agency or institution attended.

(b) Directory information does not include a student's—

(1) Social security number; or

(2) Student identification (ID) number, except as provided in paragraph (c) of this definition.

(c) In accordance with paragraphs (a) and (b) of this definition, directory information includes—

(1) A student ID number, user ID, or other unique personal identifier used by a student for purposes of accessing or communicating in electronic systems, but only if the identifier cannot be used to gain access to education records except when used in conjunction with one or more factors that authenticate the user's identity, such as a personal identification number (PIN), password or other factor known or possessed only by the authorized user; and

(2) A student ID number or other unique personal identifier that is displayed on a student ID badge, but only if the identifier cannot be used to gain access to education records except when used in conjunction with one or more factors that authenticate the user's identity, such as a PIN, password, or other factor known or possessed only by the authorized user.

(Authority: 20 U.S.C. 1232g(a)(5)(A))

Disciplinary action or proceeding means the investigation, adjudication, or



imposition of sanctions by an educational agency or institution with respect to an infraction or violation of the internal rules of conduct applicable to students of the agency or institution.

Disclosure means to permit access to or the release, transfer, or other communication of personally identifiable information contained in education records by any means, including oral, written, or electronic means, to any party except the party identified as the party that provided or created the record.

(Authority: 20 U.S.C. 1232g(b)(1) and (b)(2))

Early childhood education program means—

(a) A Head Start program or an Early Head Start program carried out under the Head Start Act (42 U.S.C. 9831 et seq.), including a migrant or seasonal Head Start program, an Indian Head Start program, or a Head Start program or an Early Head Start program that also receives State funding;

(b) A State licensed or regulated child care program; or

(c) A program that—

(1) Serves children from birth through age six that addresses the children's cognitive

(including language, early literacy, and early mathematics), social, emotional, and physical development; and

(2) Is—

(i) A State prekindergarten program;

(ii) A program authorized under section 619 or part C of the Individuals with Disabilities Education Act; or

(iii) A program operated by a local educational agency.

Educational agency or institution means any public or private agency or institution to which this part applies under §99.1(a).

(Authority: 20 U.S.C. 1232g(a)(3))

Education program means any program that is principally engaged in the provision of education, including, but not limited to, early childhood education, elementary and secondary education, postsecondary education, special education, job training, career and technical education, and adult education, and any program that is administered by an educational agency or institution.

(Authority: 20 U.S.C. 1232g(b)(3), (b)(5))

Education records. (a) The term means those records that are:

(1) Directly related to a student; and

(2) Maintained by an educational agency or institution or by a party acting for the agency or institution.

(b) The term does not include:

(1) Records that are kept in the sole possession of the maker, are used only as a personal memory aid, and are not accessible or revealed to any other person except a temporary substitute for the maker of the record.

(2) Records of the law enforcement unit of an educational agency or institution, subject to the provisions of §99.8.

(3)(i) Records relating to an individual who is employed by an educational agency or institution, that:

(A) Are made and maintained in the normal course of business;

(B) Relate exclusively to the individual in that individual's capacity as an employee; and

(C) Are not available for use for any other purpose.

(ii) Records relating to an individual in attendance at the

agency or institution who is employed as a result of his or her status as a student are education records and not excepted under paragraph (b)(3)(i) of this definition.

(5) Records created or received by an educational agency or institution after an individual is no longer a student in attendance and that are not directly related to the individual's attendance as a student.

(6) Grades on peer-graded papers before they are collected and recorded by a teacher.

(Authority: 20 U.S.C. 1232g(a)(4))

Parent means a parent of a student and includes a natural parent, a guardian, or an individual acting as a parent in the absence of a parent or a guardian.

(Authority: 20 U.S.C. 1232g)

Party means an individual, agency, institution, or organization.

(Authority: 20 U.S.C. 1232g(b)(4)(A))

Personally Identifiable Information  
The term includes, but is not limited to—

(a) The student's name;

		<p>(b) The name of the student's parent or other family members;</p> <p>(c) The address of the student or student's family;</p> <p>(d) A personal identifier, such as the student's social security number, student number, or biometric record;</p> <p>(e) Other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name;</p> <p>(f) Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or</p> <p>(g) Information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates.</p> <p>(Authority: 20 U.S.C. 1232g)</p> <p>Record means any information recorded in any way, including, but not limited to, handwriting, print, computer media, video or audio tape, film, microfilm, and microfiche.</p> <p>(Authority: 20 U.S.C. 1232g)</p>				
--	--	---	--	--	--	--

Secretary means the Secretary of the U.S. Department of Education or an official or employee of the Department of Education acting for the Secretary under a delegation of authority.

(Authority: 20 U.S.C. 1232g)

Student, except as otherwise specifically provided in this part, means any individual who is or has been in attendance at an educational agency or institution and regarding whom the agency or institution maintains education records.

(Authority: 20 U.S.C. 1232g(a)(6))

[53 FR 11943, Apr. 11, 1988, as amended at 60 FR 3468, Jan. 17, 1995; 61 FR 59295, Nov. 21, 1996; 65 FR 41852, July 6, 2000; 73 FR 74851, Dec. 9, 2008; 76 FR 75641, Dec. 2, 2011]

return arrow Back to Top

§99.4 What are the rights of parents?

An educational agency or institution shall give full rights under the Act to either parent, unless the agency or institution has been provided with evidence that there is a court order, State statute, or legally binding document relating to such matters as divorce, separation, or custody that

		<p>specifically revokes these rights.</p> <p>(Authority: 20 U.S.C. 1232g)</p> <p>return arrow Back to Top</p> <p>§99.5 What are the rights of students?</p> <p>(a)(1) When a student becomes an eligible student, the rights accorded to, and consent required of, parents under this part transfer from the parents to the student.</p> <p>(2) Nothing in this section prevents an educational agency or institution from disclosing education records, or personally identifiable information from education records, to a parent without the prior written consent of an eligible student if the disclosure meets the conditions in §99.31(a)(8), §99.31(a)(10), §99.31(a)(15), or any other provision in §99.31(a).</p> <p>(b) The Act and this part do not prevent educational agencies or institutions from giving students rights in addition to those given to parents.</p> <p>(c) An individual who is or has been a student at an educational institution and who applies for admission at another component of that institution does not have rights under this part with respect to records maintained by that other component, including records maintained in connection with</p>			
--	--	---	--	--	--

		<p>the student's application for admission, unless the student is accepted and attends that other component of the institution.</p> <p>(Authority: 20 U.S.C. 1232g(d))</p> <p>[53 FR 11943, Apr. 11, 1988, as amended at 58 FR 3188, Jan. 7, 1993; 65 FR 41853, July 6, 2000; 73 FR 74852, Dec. 9, 2008]</p> <p>§99.6 [Reserved] return arrow Back to Top</p> <p>§99.7 What must an educational agency or institution include in its annual notification?</p> <p>(a)(1) Each educational agency or institution shall annually notify parents of students currently in attendance, or eligible students currently in attendance, of their rights under the Act and this part.</p> <p>(2) The notice must inform parents or eligible students that they have the right to—</p> <p>(i) Inspect and review the student's education records;</p> <p>(ii) Seek amendment of the student's education records that the parent or eligible student believes to be inaccurate, misleading, or otherwise in violation of the student's privacy rights;</p> <p>(iii) Consent to disclosures of personally identifiable</p>			
--	--	--	--	--	--



information contained in the student's education records, except to the extent that the Act and §99.31 authorize disclosure without consent; and

(iv) File with the Department a complaint under §§99.63 and 99.64 concerning alleged failures by the educational agency or institution to comply with the requirements of the Act and this part.

(3) The notice must include all of the following:

(i) The procedure for exercising the right to inspect and review education records.

(ii) The procedure for requesting amendment of records under §99.20.

(iii) If the educational agency or institution has a policy of disclosing education records under §99.31(a)(1), a specification of criteria for determining who constitutes a school official and what constitutes a legitimate educational interest.

(b) An educational agency or institution may provide this notice by any means that are reasonably likely to inform the parents or eligible students of their rights.

(1) An educational agency or institution shall effectively notify parents or eligible students who are disabled.

(2) An agency or institution of elementary or secondary education shall effectively notify parents who have a primary or home language other than English.

§99.8 What provisions apply to records of a law enforcement unit?

(a)(1) Law enforcement unit means any individual, office, department, division, or other component of an educational agency or institution, such as a unit of commissioned police officers or non-commissioned security guards, that is officially authorized or designated by that agency or institution to—

(i) Enforce any local, State, or Federal law, or refer to appropriate authorities a matter for enforcement of any local, State, or Federal law against any individual or organization other than the agency or institution itself; or

(ii) Maintain the physical security and safety of the agency or institution.

(2) A component of an educational agency or institution does not lose its status as a law enforcement unit if it also performs other, non-law enforcement functions for the agency or institution, including investigation of incidents or conduct that constitutes or leads to a

		<p>disciplinary action or proceedings against the student.</p> <p>(b)(1) Records of a law enforcement unit means those records, files, documents, and other materials that are—</p> <p>(i) Created by a law enforcement unit;</p> <p>(ii) Created for a law enforcement purpose; and</p> <p>(iii) Maintained by the law enforcement unit.</p> <p>(2) Records of a law enforcement unit does not mean—</p> <p>(i) Records created by a law enforcement unit for a law enforcement purpose that are maintained by a component of the educational agency or institution other than the law enforcement unit; or</p> <p>(ii) Records created and maintained by a law enforcement unit exclusively for a non-law enforcement purpose, such as a disciplinary action or proceeding conducted by the educational agency or institution.</p> <p>(c)(1) Nothing in the Act prohibits an educational agency or institution from contacting its law enforcement unit, orally or in writing, for the purpose of asking that unit to investigate a possible violation of, or to</p>				
--	--	--	--	--	--	--

		<p>enforce, any local, State, or Federal law.</p> <p>(2) Education records, and personally identifiable information contained in education records, do not lose their status as education records and remain subject to the Act, including the disclosure provisions of §99.30, while in the possession of the law enforcement unit.</p> <p>(d) The Act neither requires nor prohibits the disclosure by an educational agency or institution of its law enforcement unit records</p>				
<p>(b) If a program serves a child who is referred to, or found eligible for services under, IDEA, then a program must comply with the applicable confidentiality provisions in Part B or Part C of IDEA to protect the PII in records of those children, and therefore, the provisions in this subpart do not apply to those children.</p>	<p>Consent means that—</p> <p>(a) The parent has been fully informed of all information relevant to the activity for which consent is sought, in his or her native language, or through another mode of communication;</p> <p>(b) The parent understands and agrees in writing to the carrying out of the activity for which his or her consent is sought, and the consent describes that activity and lists the records (if any) that will be released and to whom; and</p> <p>(c)(1) The parent understands that the granting of consent is voluntary on the part of</p>	<p>Prior to the release of information regardless of the entity, a release of information obtained between MCHS and the parent / legal guardian.</p>	<p>Confidentiality</p> <p>Release of Information</p>	<p>All Staff</p>	<p>MCHS personnel Handbook</p> <p>Parent Handbook</p>	

the parent and may be revoked at any time.  
(2) If a parent revokes consent, that revocation is not retroactive (i.e., it does not negate an action that has occurred after the consent was given and before the consent was revoked).  
(3) If the parent revokes consent in writing for their child's receipt of special education services after the child is initially provided special education and related services, the public agency is not required to amend the child's education records to remove any references to the child's receipt of special education and related services because of the revocation of consent.  
(a) Parental consent must be obtained before personally identifiable information is disclosed to parties, other than officials of participating agencies in accordance with paragraph (b)(1) of this section, unless the information is contained in education records, and the disclosure is authorized without parental consent under 34 CFR part 99.  
..

<p><b>1303.22 Disclosures with, and without, parental consent</b></p>	<p>(a) Disclosure with parental consent. (1) Subject to the exceptions in paragraphs (b) and (c) of this section, the procedures to protect PII must require the program to obtain a parent's written consent before the program may disclose such PII from the child records.</p>	<p>(b)(2) Parental consent, or the consent of an eligible child who has reached the age of majority under State law, must be obtained before personally identifiable information is released to officials of participating agencies providing or paying for transition services in accordance with § 300.321(b)(3). (3) If a child is enrolled, or is going to enroll in a private school that is not located in the LEA [local educational agency] of the parent's residence, parental consent must be obtained before any personally identifiable information about the child is released between officials in the LEA where the private school is located and officials in the LEA of the parent's residence.</p>	<p>Currently, MCHS does not utilize electronic signatures for obtaining consent.</p>	<p>Disclosure with parental Consent</p>	<p>All staff</p>	<p>Disclosure with parental consent</p>
---	--	--	--	---	------------------	---

(2) The procedures to protect PII must require the program to ensure the parent's written consent specifies what child records may be disclosed, explains why the records may be disclosed, explains why the records will be disclosed, and identifies the party or class of parties to whom the records may be disclosed. The written consent must be signed and dated.

(3) "Signed and dated written consent" under this part may include a record and signature in electronic form that:

- (i) Identifies and authenticates a particular person as the source of the electronic consent;
- and,
- (ii) Indicates such person's approval of the information.

(4) The program must explain to the parent that the granting of consent is voluntary on the part of the parent and may be revoked at any time. If a parent revokes consent, that revocations is not retroactive and therefore it does not apply to an action that occurred before the consent was revoked.

	<p>(b) Disclosure without parental consent but with parental notice and opportunity to refuse. The procedures to protect PII must allow the program to disclose such PII from child records without parental consent if the program notifies the parent about the disclosure, provides the parent, upon the parent's request, a copy of the PII from child records to be disclosed in advance, and gives the parent an opportunity to challenge and refuse disclosure of the information in the records, before the program forwards the records to officials at a program, school, or school district in which the child seeks or intends to enroll or where the child is already enrolled so long as the disclosure is related to the child's enrollment or transfer.</p>		<p>At the time of enrollment, MCHS staff informs parents / guardians that the child's name may be released to the school district of residence for the purpose of transitioning to kindergarten. MCHS staff obtain this consent via the parent permission for program services form. Parents have the right to opt out.</p>	<p>Parent permission for program services Disclosure without parental consent but with notice</p>	<p>Family Advocates</p>	<p>Parent permission for program services. Disclosure without parental consent but with notice.</p>
	<p>(c) Disclosure without parental consent. The procedures to protect PII must allow the program to disclose such PII from child records without parental consent to:  (1) Officials within the program or acting for the program, such as contractors and</p>	<p>Individuals such as an education coach and / or the mental health consultant may have access to children's files for the purpose of quality improvement, program oversight, or direct service implementation.  These individuals must sign and adhere to the program's Confidentiality policy.</p>		<p>Confidentiality Policy Disclosure without parental consent</p>	<p>Contracted employees All staff</p>	<p>Confidentiality Policy Disclosure without parental consent.</p>



	<p>subrecipients, if the official provides services for which the program would otherwise use employees, the program determines it is necessary for Head Start services, and the program maintains oversight with respect to the use, further disclosure, and maintenance of child records, such as through a written agreement;</p> <p>(2) Officials within the program, acting for the program, or from a federal or state entity, in connection with an audit or evaluation of education of child development programs, or for enforcement of or compliance with federal legal requirements of the program; provided the program maintains oversight with respect to the use, further disclosure, and maintenance of child records, such as through a written agreement, including the destruction of the PII when no longer needed for the purpose of the disclosure, except when the disclosure is specifically authorized by federal law or by the responsible HHS official;</p> <p>(3) Officials within the program, acting for the program, or from a federal</p>		<p>Due to rigorous oversight by local, state, and federal entities, other monitoring mechanisms and individuals may have access to confidential information for the purpose of oversight and monitoring. Information sharing agreements are completed when deemed necessary.</p> <p>MCHS may allow access to child records when a subpoena is put into place, as directed by a federal, state, or local law enforcement officer, a member of HHS, emergency personnel, a child abuse case (court-ordered and / or investigations), USDA monitoring, and any other legal action.</p> <p>MCHS has the right to contact legal representation at any time for</p>		
--	---	--	---	--	--

	<p>or state entity, to conduct a study to improve child and family outcomes, including improving the quality of programs, for, or on behalf of, the program, provided the program maintains oversight with respect to the use, further disclosure, and maintenance of child records, such as through a written agreement, including the destruction of the PII when no longer needed for the purpose of the disclosure;</p> <p>(4) Appropriate parties in order to address a disaster, health or safety emergency during the period of the emergency, or a serious health and safety risk such as a serious food allergy, if the program determines that disclosing the PII from child records is necessary to protect the health or safety of children or other persons;</p> <p>(5) Comply with a judicial order or lawfully issued subpoena, provided the program makes a reasonable effort to notify the parent about all such subpoenas and court orders in advance of the compliance therewith, unless:</p>		<p>clarification and to protect the privacy of staff and children.</p>			
--	--	--	--	--	--	--

(i) A court has ordered that neither the subpoena, its contents, nor the information provided in response be disclosed;

(ii) The disclosure is in compliance with an ex parte court order obtained by the United States Attorney General (or designee not lower than an Assistant Attorney General) concerning investigations or prosecutions of an offense listed in 18 U.S.C. 2332b(g)(5)(B) or an act of domestic or international terrorism as defined in 18 U.S.C. 2331.

(iii) A parent is a party to a court proceeding directly involving child abuse and neglect (as defined in section 3 of the Child Abuse Prevention and Treatment Act (42 U.S.C. 5101)) or dependency matters, and the order is issued in the context of that proceeding, additional notice to the parent by the program is not required; or,

(iv) A program initiates legal action against a parent or a parent initiates legal action against a program, then a program may disclose to the court, also without a court order

	<p>or subpoena, the child records relevant for the program to act as plaintiff or defendant.</p> <p>(6) The Secretary of Agriculture or an authorized representative from the Food and Nutrition Service to conduct program monitoring, evaluations, and performance measurements for the Child and Adult Care Food Program under the Richard B. Russell National School Lunch Act or the Child Nutrition Act of 1966, if the results will be reported in an aggregate form that does not identify any individual: provided, that any data collected must be protected in a manner that will not permit the personal identification of students and their parents by other than the authorized representatives of the Secretary of Agriculture and any PII must be destroyed when the data are no longer needed for program monitoring, evaluations, and performance measurements;</p> <p>(7) A caseworker or other representative from a state, local, or tribal child welfare agency, who has the right to access a case</p>					
--	--	--	--	--	--	--

	<p>plan for a child who is in foster care placement, when such agency is legally responsible for the child's care and protection, under state or tribal law, if the agency agrees in writing to protect PII, to use information from the child's case plan for specific purposes intended of addressing the child's needs, and to destroy information that is no longer needed for those purposes; and,</p> <p>(8) Appropriate parties in order to address suspected or known child maltreatment and is consistent with applicable federal, state, local, and tribal laws on reporting child abuse and neglect.</p>					
	<p>d) Written agreements. When a program establishes a written agreement with a third party, the procedures to protect such PII must require the program to annually review and, if necessary, update the agreement. If the third party violates the agreement, then the program may:</p> <p>(1) Provide the third party an opportunity to self-correct; or,</p>		<p>Interagency agreements and memorandums of understanding disclose the parameters of information sharing between partners.</p>	<p>Memorandum of Understanding</p>	<p>Executive Director</p>	<p>Memorandum of Understanding</p>

	<p>(2) Prohibit the third party from access to records for a set period of time as established by the programs governing body and policy council.</p>					
	<p>(e) Annual notice. The procedures to protect PII must require the program to annually notify parents of their rights in writing described in this subpart and applicable definitions in §1305, and include in that notice a description of the types of PII that may be disclosed, to whom the PII may be disclosed, and what may constitute a necessary reason for the disclosure without parental consent as described in paragraph (c) of this section</p>		<p>Annually, during enrollment, Family Advocates review a family's right to privacy as well as program safeguards. Parents are informed of the release of information requirement as well as implied consent through the use of parent permission for program services form.</p>	<p>Parent Handbook Parent permission for program services</p>	<p>Family Advocates</p>	<p>Confidentiality – Annual Notice</p>

					Release of Information	
					All staff	
					Release of Information	
				When disclosing / sharing / or obtaining information, MCHS can only disclose / share / obtain information as it is written specifically on a release of information. Once a release is signed by a parent, MCHS staff can not add to or delete any information from document. At no time shall a parent / guardian / provider be requested to sign a blank release of information document.		
				MCHS acknowledges a parent / guardian right to inspect a child's record.  To inspect a child record, the parent / guardian must put the request into writing and submit to the executive director for review.  MCHS must protect the privacy of each enrolled student, family, and staff member. When submitting records for preview per request, MCHS must omit any information that would identify another child for who the request was not for.	Request to inspect child record	Request to inspect child record
						Executive Director
						FESM / IT Secretary
						Inspection of Child Records
				(f) Limit on disclosing PII. A program must only disclose the information that is deemed necessary for the purpose of the disclosure.		
				(a) Inspect record. (1) A parent has the right to inspect child records. (2) If the parent requests to inspect child records, the program must make the child records available within a reasonable time, but no more than 45 days after receipt of request. (3) If a program maintains child records that contain information on more than one child, the program must ensure the parent only inspects information		
				<b>1303.23 Parental rights.</b>		

	<p>that pertains to the parent's child.</p> <p>(4) The program shall not destroy a child record with an outstanding request to inspect and review the record under this section.</p>		<p>MCHS will follow established required guidance for record retention per policy.</p>	<p>Records Retention</p>	<p>FESM, FA, IT Secretary</p>	<p>Fiscal Policy Manual</p>
	<p>(b) Amend record. (1) A parent has the right to ask the program to amend information in the child record that the parent believes is inaccurate, misleading, or violates the child's privacy.</p> <p>(2) The program must consider the parent's request and, if the request is denied, render a written decision to the parent within a reasonable time that informs the parent of the right to a hearing.</p>		<p>Parent / guardian has the right to request that a child's record be amended. Parent / Guardian must put the amendment request in writing and submit to the Executive Director.</p> <p>The Executive Director will investigate the circumstances of the request and make a determination. If the request is denied, a letter will be sent to the parent / guardian informing him / her of the decision and the right to a hearing.</p>	<p>Request for amendment to child record</p>	<p>Executive Director</p>	<p>Request for amendment to child record</p>
	<p>(c) Hearing. (1) If the parent requests a hearing to challenge information in the child record, the program must schedule a hearing within a reasonable time, notify the parent, in advance, about the hearing, and ensure the person who conducts the hearing does not have a direct interest in its outcome.</p> <p>(2) The program must ensure the hearing affords the parent a full and fair opportunity to</p>		<p>MCHS will utilize the local Family and Children First Council model for parent hearings.</p> <p>FCFC will ensure fair and impartial oversight of the hearing.</p> <p>MCHS will follow the guidance of the fair and impartial oversight ruling. Any decision either in favor of or against the parent / guardian request will be placed in writing and provided to the parent / guardian.</p>	<p>Parent Hearing – child record</p>	<p>Executive Director</p>	<p>Parent Hearing – Child Record</p>



	<p>present evidence relevant to the issues.</p> <p>(3) If the program determines from evidence presented at the hearing that the information in the child records is inaccurate, misleading, or violates the child's privacy, the program must either amend or remove the information and notify the parent in writing.</p> <p>(4) If the program determines from evidence presented at the hearing that information in the child records is accurate, does not mislead, or otherwise does not violate the child's privacy, the program must inform the parent of the right to place a statement in the child records that either comments on the contested information or that states why the parent disagrees with the program's decision, or both.</p>					
<p>(d) Right to copy of record. The program must provide a parent, free of charge, an initial copy of child records disclosed to third parties with parental consent and, upon parent request, an initial copy of child records disclosed to third parties, unless the disclosure was for a court that ordered neither the</p>			<p>Upon request, MCHS will provide parent / guardian with a copy of child record that was provided to a 3<sup>rd</sup> party with parental consent.</p> <p>The request for a copy must be submitted in writing to Executive Director</p> <p>The only caveat to this request are those records which have been</p>	<p>Right to copy of child record</p>	<p>Executive Director</p>	<p>Right to copy of child record</p>

	<p>subpoena, its contents, nor the information furnished in response be disclosed.</p>		<p>disclosed, but due to a court order the disclosure is to remain confidential.</p>			
	<p>(e) Right to inspect written agreements. A parent has the right to review any written agreements with third parties.</p>		<p>Upon request, MCHS will make available any and all written disclosure agreements with third parties.</p>	<p>Written Disclosure</p>	<p>Executive Director</p>	<p>Written Disclosure</p>
<p><b>1303.24 Maintaining records.</b></p>	<p>(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.</p>		<p>MCHS collects a significant amount of information on children, families, and staff. To secure that information MCHS ensures the following:</p> <ul style="list-style-type: none"> <li>• Any data entry software system including the school district email system, websites, and databases require a password to gain entry.</li> <li>• Per the CCS IT Director, passwords are to be safe and secured and not accessible to others.</li> <li>• Employees are not to share passwords for entry into various databases.</li> </ul> <p>MCHS utilizes COPA as the comprehensive data collection system. The IT Secretary is the only individual in the program with Super Admin rights. This allows for the security of password assignment, program permission access, and entry to be filtered through 1 individual.</p> <p>MCHS maintains physical child records, program records, and fiscal records on and offsite. To ensure the safety and security of</p>	<p>Maintain records</p>	<p>Admin Team</p>	<p>Maintain Records</p>

			<p>those documents the following will occur:</p> <ul style="list-style-type: none"> <li>• All student files including but not limited to child / family file, child educational file, child portfolio, child emergency transport file MUST be kept in a locked file cabinet, closet, or other cabinet at all times.</li> <li>• All physical program records are kept collected in the administrative office(s) of the program.</li> <li>• Physical fiscal documentation is maintained in the administrative office(s) or District Treasurer's office.</li> </ul> <p>Student / family files are kept on site while the child is enrolled and for the following 2 years of enrollment. The next 2 years the child / family file is archived in storage and maintained until the child / family file age reaches 7 years. At that time, the file may be destroyed.</p> <p>Non-required program information is maintained in administrative offices and may be destroyed after 5 years.</p> <p>All fiscal documents are kept onsite for 3 years and then archived and placed in storage thereafter.</p>		
	(b) A program must maintain, with the child		<p>Any and all releases of information or case notes pertaining to a</p>		

	<p>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</p>		<p>release of information become a part of the child's permanent file and as such follow the same guidance as the maintain records policy.</p>		
<p>(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.</p>			<p>Any and all information regarding a child / family that is recorded, accepted / submitted becomes a part of the child's permanent record and as such follows the same guidance as the maintain records policy.</p>		

## Mercer County Head Start Policies and Procedures

<b>P/P Topic:</b>	Maintain Records	<b>P/P #:</b>	
<b>Part:</b>	1303 Financial and Administrative Requirements	<b>PC Approval Date:</b>	
<b>Subpart:</b>	<i>C – Protection for the Privacy of Child Records</i>	<b>Last Reviewed Date:</b>	
<b>Section Title(s):</b>	<i>Parental rights</i>	<b>Implementation Responsibility:</b>	Executive Director
<b>Related Performance Standard(s):</b>	1303.24	<b>Monitoring Responsibility:</b>	Board of Education

<b>(A) Policy</b>	<p>(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.</p> <p>(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</p> <p>(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.</p>
<b>(B) Responsibility</b>	Executive Director
<b>(C) Procedure</b>	<ul style="list-style-type: none"> <li>• Any data entry software system including the school district email system, websites, and databases require a password to gain entry.</li> <li>• Per the CCS IT Director, passwords are to be safe and secured and not accessible to others.</li> <li>• Employees are not to share passwords for entry into various databases.</li> <li>• All student files including but not limited to child / family file, child educational file, child portfolio, child emergency transport file MUST be kept in a locked file cabinet, closet, or other cabinet at all times (or in the custody of MCHS employee).</li> <li>• All physical program records are kept collected in the administrative office(s) of the program (or approved storage facility).</li> <li>• Physical fiscal documentation is maintained in the administrative office(s) or District Treasurer’s office (or approved storage facility).</li> </ul>

# Mercer County Head Start Policies and Procedures

<b>P/P Topic:</b>	Right to Copy Child Record	<b>P/P #:</b>	
<b>Part:</b>	1303 Financial and Administrative Requirements	<b>PC Approval Date:</b>	
<b>Subpart:</b>	<i>C – Protection for the Privacy of Child Records</i>	<b>Last Reviewed Date:</b>	
<b>Section Title(s):</b>	<i>Parental rights</i>	<b>Implementation Responsibility:</b>	Executive Director
<b>Related Performance Standard(s):</b>	1303.23(d)	<b>Monitoring Responsibility:</b>	Board of Education

<b>(A) Policy</b>	(d) Right to copy of record. The program must provide a parent, free of charge, an initial copy of child records disclosed to third parties with parental consent and, upon parent request, an initial copy of child records disclosed to third parties, unless the disclosure was for a court that ordered neither the subpoena, its contents, nor the information furnished in response be disclosed.
<b>(B) Responsibility</b>	Executive Director
<b>(C) Procedure</b>	<p>Upon request, MCHS will provide parent / guardian with a copy of child record that was provided to a 3rd party with parental consent.</p> <p>The request for a copy must be submitted in writing to Executive Director</p> <p>The only caveat to this request are those records which have been disclosed, but due to a court order the disclosure is to remain confidential.</p>

## Mercer County Head Start Policies and Procedures

<b>P/P Topic:</b>	Inspection of Child Records	<b>P/P #:</b>	
<b>Part:</b>	1303 Financial and Administrative Requirements	<b>PC Approval Date:</b>	
<b>Subpart:</b>	<i>C – Protection for the Privacy of Child Records</i>	<b>Last Reviewed Date:</b>	
<b>Section Title(s):</b>	<i>Parental rights</i>	<b>Implementation Responsibility:</b>	Executive Director
<b>Related Performance Standard(s):</b>	1303.23(a)	<b>Monitoring Responsibility:</b>	Board of Education

<b>(A) Policy</b>	<p>(a) <i>Inspect record.</i></p> <p>(3) If a program maintains child records that contain information on more than one child, the program must ensure the parent only inspects information that pertains to the parent’s child.</p>
<b>(B) Responsibility</b>	Executive Director
<b>(C) Procedure</b>	<p>When a parent / guardian requests to inspect a child record, the program will ensure that any information available to be inspected does not identify any other child in the program.</p> <p>For example, if a parent / guardian requests a child’s attendance record, the program will ensure that no other children’s names are on the attendance roster or report.</p> <p>Please reference the Request to Inspect Child Records policy for additional guidance.</p>

## Mercer County Head Start Policies and Procedures

<b>P/P Topic:</b>	Request for Amendment to Child Record	<b>P/P #:</b>	
<b>Part:</b>	1303 Financial and Administrative Requirements	<b>PC Approval Date:</b>	
<b>Subpart:</b>	<i>C – Protection for the Privacy of Child Records</i>	<b>Last Reviewed Date:</b>	
<b>Section Title(s):</b>	<i>Parental rights</i>	<b>Implementation Responsibility:</b>	Executive Director
<b>Related Performance Standard(s):</b>	1303.23(b)	<b>Monitoring Responsibility:</b>	Board of Education

<b>(A) Policy</b>	<p>(b) Amend record. (1) A parent has the right to ask the program to amend information in the child record that the parent believes is inaccurate, misleading, or violates the child’s privacy.</p> <p>(2) The program must consider the parent’s request and, if the request is denied, render a written decision to the parent within a reasonable time that informs the parent of the right to a hearing.</p>
<b>(B) Responsibility</b>	Executive Director
<b>(C) Procedure</b>	<p>Parent / guardian has the right to request that a child’s record be amended. Parent / Guardian must put the amendment request in writing and submit to the Executive Director. Parent / Guardian must request the right to inspect the child record by completing a request form. See request to inspect child record.</p> <p>A parent / guardian may submit their suggested amendment information via the Child Record Amendment form via the FESM. That form is then given to the Executive Director for review &amp; consideration.</p> <p>The Executive Director will investigate the circumstances of the request and make a determination. If the request is denied, a letter will be sent to the parent / guardian informing him / her of the decision and the right to a hearing.</p>



# Mercer County Head Start Policies and Procedures

<b>P/P Topic:</b>	Parent Hearing – Child Record	<b>P/P #:</b>	
<b>Part:</b>	1303 Financial and Administrative Requirements	<b>PC Approval Date:</b>	
<b>Subpart:</b>	<i>C – Protection for the Privacy of Child Records</i>	<b>Last Reviewed Date:</b>	
<b>Section Title(s):</b>	<i>Parental rights</i>	<b>Implementation Responsibility:</b>	Executive Director
<b>Related Performance Standard(s):</b>	1303.23(c)	<b>Monitoring Responsibility:</b>	Board of Education

<b>(A) Policy</b>	<p>(c) Hearing. (1) If the parent requests a hearing to challenge information in the child record, the program must schedule a hearing within a reasonable time, notify the parent, in advance, about the hearing, and ensure the person who conducts the hearing does not have a direct interest in its outcome.</p> <p>(2) The program must ensure the hearing affords the parent a full and fair opportunity to present evidence relevant to the issues.</p> <p>(3) If the program determines from evidence presented at the hearing that the information in the child records is inaccurate, misleading, or violates the child’s privacy, the program must either amend or remove the information and notify the parent in writing.</p> <p>(4) If the program determines from evidence presented at the hearing that information in the child records is accurate, does not mislead, or otherwise does not violate the child’s privacy, the program must inform the parent of the right to place a statement in the child records that either comments on the contested information or that states why the parent disagrees with the program’s decision, or both.</p>
<b>(B) Responsibility</b>	Executive Director
<b>(C) Procedure</b>	<p>MCHS will utilize the local Family and Children First Council model for parent hearings.</p> <p>The FCFC model will ensure fair and impartial oversight of the hearing.</p> <p>A parent has the right to ask for a hearing in regards to a request to inspect a child record that resulted in the denial of a proposed amendment to a child record.</p> <p>Parent / guardian must submit a request for a hearing in writing.</p> <p>The Executive Director will review the request, contact the local</p>

## Mercer County Head Start Policies and Procedures

<b>P/P Topic:</b>	Request to Inspect Child Record	<b>P/P #:</b>	
<b>Part:</b>	1303 Financial and Administrative Requirements	<b>PC Approval Date:</b>	
<b>Subpart:</b>	<i>C – Protection for the Privacy of Child Records</i>	<b>Last Reviewed Date:</b>	
<b>Section Title(s):</b>	<i>Parental rights</i>	<b>Implementation Responsibility:</b>	Executive Director
<b>Related Performance Standard(s):</b>	1303.23(a)	<b>Monitoring Responsibility:</b>	Board of Education

<b>(A) Policy</b>	<p>(a) <i>Inspect record.</i> (1) A parent has the right to inspect <u>child records</u>.</p> <p>(2) If the parent requests to inspect child records, the program must make the child records available within a reasonable time, but no more than 45 days after receipt of request.</p> <p>(3) If a program maintains child records that contain information on more than one child, the program must ensure the parent only inspects information that pertains to the parent’s child.</p> <p>(4) The program shall not destroy a child record with an outstanding request to inspect and review the record under this section.</p>
<b>(B) Responsibility</b>	Executive Director
<b>(C) Procedure</b>	<p>To inspect a child record, the parent / guardian must put the request into writing and submit to the executive director for review.</p> <p>Parents are to ask Family Advocates for the Request for Child Record form. Family Advocates submit the form to the FESM. The FESM presents the form to the Executive Director.</p> <p>The Executive Director will coordinate scheduling an appointment with the FESM on behalf of the family. The child record can be viewed in the administrative office.</p> <p>All communication regarding the request for inspection of child record will be documented in the child’s ongoing record.</p>