

**CHILDREN’S TRUST OF ALACHUA COUNTY
RESOLUTION 2022-XX**

ADOPTION OF CHAPTER X – DATA COLLECTION AND MANAGEMENT

WHEREAS, the Trust recognizes the importance of protecting the personally identifiable information (PII) of the children and families served;

WHEREAS, in accordance with Sec. [125.901](#), Fla. Stat. PII of children or parents or guardians of children held by the Trust, a contracted service provider, or researcher is exempt from the provisions of the Florida Public Records Law, Sec. [119.07](#), Fla. Stat.

WHEREAS, the Trust recognizes that evaluation of programs and services improves quality, gauges impact, promotes transparency, increases accountability, and confirms whether efforts are effective and beneficial in helping Alachua County children achieve their full potential;

WHEREAS, PII is needed to provide, assess, and coordinate services over time, and for on-going planning, quality improvement, and to determine effectiveness of efforts, strategies and ultimately whether the goals of the Trust are being accomplished.

WHEREAS, the Trust convened a Data Technical Advisory Committee to involve service providers and community stakeholders in formulating and reaching consensus on the recommendations set forth in this policy;

WHEREAS, the Trust agrees it shall protect data collected in a manner that will not permit the personal identification of children and their parents to persons other than those authorized to receive the records.

NOW, THEREFORE, be it ordained by the Board of the Children’s Trust of Alachua County, in the State of Florida, as follows:

SECTION 1

Purpose and Intent

Sec. [125.901](#), Fla. Stat., as adopted by ordinance approved by referendum of the electorate of Alachua County, provides the legal authority for the creation of the Children’s Trust of Alachua County to become a coordinating body and funder of children’s services throughout the county.

Accountability and evaluation are noted as functions and responsibilities per this statute:

- 1) To understand the needs of children and families.

- “To collect information and statistical data and to conduct research which will be helpful to the council and the county in deciding the needs of children in the county.” (Sec. 125.901(2)(a)4, Fla. Stat.)

2) To determine if services are effective and beneficial.

- “Information on the effectiveness of activities, services, and programs offered by the council, including cost-effectiveness.” (Sec. 125.901(5)(a), Fla. Stat.)
- “Detailed information on the various programs, services, and activities available to participants and the degree to which the programs, services, and activities have been successfully used by children.” (Sec. 125.901(5)(e), Fla. Stat.)

Data is essential for prioritizing, managing, and guiding decision making on how to provide the best and most impactful services for Alachua County children. Evaluation is a systematic process and widely recognized as critical for establishing and achieving goals. Using data to regularly monitor progress helps organizations achieve higher levels of success, delivers evidence to demonstrate utilization and effectiveness of Trust funded services. Data is a critical communication tool to develop partnerships and advocate for resources to address needs.

Additionally, the evaluation process provides opportunities for children and families to have a voice and express valuable feedback on quality, benefits of services, and other information that can contribute to program improvements. Evaluation supports the development of knowledge needed to understand the reach and effectiveness of programs across populations and contexts which furthers equitable practices and distribution of resources. In sum, data collection is critical in helping the Trust carry out its mission.

SECTION 2

What data is collected?

The Trust seeks to collect data so it may effectively fulfill our mission of serving children, so they are healthy, educated, supported, and safe. At the February 2022 Board Retreat, Board members expressed the need for information to demonstrate the impact of the Trust. Specific information needs include how Trust funds are being invested, who the Trust is reaching, effectiveness of services, benefits and outcomes, what progress has been made toward community-level goals and developing trusting and collaborative relationships with families and partners. The Data Technical Advisory Committee commissioned by the Board was in alignment and echoing many of the same data collection imperatives, including:

- amount and duration of services,
- program cost,
- key characteristics of participants,
- benefits and effectiveness of funded services,
- ways to potentially link with other systems,
- an identified purpose, and
- ways to meaningfully use and communicate findings.

The Trust encourages providers to allocate staff time for data collection and related evaluation activities. Providers will be compensated for data collection and evaluation activities prompted by the Trust through this allocation of staff time.

Data elements required for each contract will be determined by the type of service, program model, duration or amount of service, and level of investment. Contracts providing the same or similar service will have the same data elements and assessment tools for consistency to allow for analysis across contracts to evaluate the Trust's investment in the overall initiative.

SECTION 3

How do we inform participants?

The Trust will develop a consent statement and process that informs participants why information is being collected and how it will be used. The Trust will inform participants about our data collection and management through the following practices:

- Providers collecting PII from children and families to submit to the Trust shall obtain consent, from a person legally authorized to give consent, to collect and provide this data to the Trust.
- The Trust will provide a short consent statement that will include the following: (1) why the information is being collected, (2) how it will be used, and (3) how it will be protected.
- This data collection and management policy will be available on the Trust's website, along with staff contact information, to receive any questions, concerns, or grievances.

SECTION 4

What data is required vs. encouraged?

Required data elements for accountability typically includes enrollment/registration, eligibility documentation, and attendance or participation. As a government entity, the Trust requires these data to account for services being rendered and to confirm dollars were appropriately used for public good and as specified in the contract.

While providers may provide services to children and families through other funding sources, due to the Trust's accountability requirements, there is not an opt-out option for required data elements by participants receiving Trust funds.

- Providers will communicate with families why and how information will be used and protected and emphasize their information would be used in ways consistent with this policy (i.e., kept private, not shared with unauthorized individuals, and used specifically for accountability, evaluation, program improvement).
- The Trust would establish a feedback cycle with providers and families, which would include learning more about any concerns about the information collected, so the Trust can gain understanding, make improvements, and address concerns families have related to information being requested.

Providers are required to help administer and encourage participants to take part in data collection activities to assess program performance and outcomes. Data tools used may include surveys, focus groups, interviews, and other types of qualitative data collection. Participation of parents, caregivers, and children in additional evaluation processes beyond accountability requirements is voluntary, and participants may refuse to participate. Parents' may elect or decline to release data to/from third parties for evaluation purposes. Participation in any Trust funded services is voluntary. Parents have the right to decide whether it is acceptable for the Trust to use photos or media that identify them or their minor children, or use identified personal testimonials, narrative, or success stories.

- The Trust values the input of as many participants as possible in data collection activities. This ensures that the data is representative, and findings drawn from it are accurate and credible. The Trust aims for participant completion rates of 70% or higher in its evaluative efforts. The Trust works individually with each provider to establish reasonable goals and targets that are achievable, consistent with the program model, and frequency and duration of services.

SECTION 5

How do we secure data?

The Trust recognizes the importance of protecting personal information of children and families who participate in Trust funded services. Personally identifiable information (PII) requested by the Trust on children and families who enroll, participate, or receive services will be collected via a secure data system where all individuals have a unique identifier. The Trust, its staff, funded providers, and IT/software vendors all have a role in data security.

The Trust will require IT and software vendors to adhere to the following practices to safeguard data collected on children and families:

- ✓ Ensure data is encrypted while at rest and in transit.
- ✓ Routinely complete an external security audit.
- ✓ Maintain an audit trail of system access.
- ✓ Configure system access to each user's specific role.
- ✓ Apply industry-standard best practices to protect PII from disclosure, through system security settings, including:
 - A strong password
 - Identity authentication (e.g., multi-factor, network/user validation)
 - Password expiration

- System lock-out after multiple failed login attempts
- Inactivity timeout
- Login inactivity suspension

All Trust and provider staff who have data system access and interface with PII will receive training on expectations related to privacy, data security, and appropriate system usage. The Trust will require both its staff and providers to adhere to the following practices to safeguard data collected on children and families:

- ✓ All data system users must commit to protect the data in a manner that does not permit the personal identification of program participants to unauthorized persons.
- ✓ All data system users will participate in training on how to use the system.
- ✓ All data users must complete a Data System User Agreement at initial login and every year thereafter.
- ✓ All data system users must report any device theft or account compromise.
- ✓ Devices used for data system access must have a password.
- ✓ Supervisors must report and/or terminate data system access immediately upon staff separation from employment.

In the event of a data breach, the Trust will take immediate action to mitigate the impact. This would include working with security experts as needed to identify and secure all affected data, devices, and systems. The Trust would notify those who were subject to an unauthorized disclosure: the nature of the disclosure, the Trust's actions to remedy the occurrence, and make improvements going forward.

SECTION 6

Data Sharing Agreements

The Trust recognizes that data sharing is important to facilitate interagency coordination of services and examination of outcomes as organizations collectively work together to serve children and families.

The Trust may enter into data sharing agreements with organizations with whom the Trust partners to achieve mutual goals to benefit children and families. Prior to sharing any data with external organizations, the Trust would ensure the following practices:

- External data sharing decisions consider the purpose and intention and weigh both the risks and benefits posed.
- Appropriate data security safeguards are employed to minimize risks.
- Research or evaluations conducted by external organizations use only deidentified data from the Trust.
- The Trust will be the organization to conduct any analysis that involves the Trust's data combined with an external dataset. To that end, only the minimum amount of information required for data matching will be released and potentially achieved by use of ID #s, pseudoIDs, and other tokens.

SECTION 7

How are evaluation results shared?

Data collection serves many purposes for the Trust in planning, monitoring performance, and progress towards goals. Data is best leveraged through thoughtful evaluation and collaboration processes so that information is fully utilized to improve the lives of children and families. To that end, the Trust desires to engage in on-going collaborative quality improvement with its providers (such as, Plan, Do, Study, Act), so there are opportunities to review evaluation results, reflect on implementation, plan for, and make needed improvements.

The Trust, as a government entity, is required to make evaluation reports, results, and presentations available to the public on request. Such reporting will be in aggregate and not identify any individual children, parents, or families. An individual may voluntarily choose to be identified through sharing their success story, or narrative experience, and photograph or other media which would require additional permission (i.e., media release).

The Trust values transparency and accountability. Therefore, the Trust will make on-going and intentional efforts to share our work with key stakeholders as well as publicly (i.e., targeted communication, outreach, through our website) in addition to making reports, results, and presentations available upon request.