

**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 ~~we 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~~ the benefit of regularly evaluating programs and services to increase quality, determine benefits, allow for transparency, accountability, and to confirm whether efforts are effective 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 by 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~~ ~~Data is valuable for prioritizing, managing, and helping to decide how to~~ provide the best and most impactful services for Alachua County children. Evaluation ~~is a systematic process and~~ ~~a systematic process for inquiry~~ ~~is~~ widely recognized as critical for establishing and achieving goals. ~~Through~~ ~~u~~Using data to regularly monitor progress helps organizations ~~achieve~~ ~~get to~~ 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~~ ~~gaps~~.

Additionally, the evaluation process ~~provides opportunities~~ ~~also allows~~ 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, as well as information needed to make improvements.~~ Evaluation supports the development of knowledge needed to understand the reach and effectiveness of programs across populations and contexts to help ~~which furthers further equitable~~ practices and distribution of resources. In sum, data collection ~~is critical in~~ ~~provides noteworthy benefits to~~ helping the Trust carry out its mission.

SECTION 2

What data is collected?

~~The Trust seeks to collect data so it may~~ ~~The Trust is interested in collecting data to provide the knowledge and insight to~~ 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~~measure~~ the impact of the Trust. Specific information needs include~~including~~ how funds are being invested, who the Trust is~~we are~~ reaching, effectiveness of services, benefits and outcomes, what progress has been made toward community-level goals and developing~~, progress toward community-level goals, and the development~~ trusting 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, ~~and~~
- 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~~would be individualized based on the type of service, intensity, level of investment, and program model~~. Contracts providing the same or similar services will~~would~~ have the same data elements and tools for consistency and to allow for analysis across contracts to evaluate the Trust's investment in the overall initiative~~initiative as a whole~~.

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.

Commented [BW1]: This now is sequenced earlier in the document.

- 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

Required data elements for accountability typically includes enrollment/registration, eligibility documentation, and attendance or participation. As a government, 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. ~~entity these data need to be collected to account for services being rendered and confirm dollars were used for public good in an appropriate way 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. There is not an opt-out option of data elements required for accountability purposes as the Trust must be able to verify services were rendered.

- Providers will ~~are to~~ 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). ~~only be used for these specific purposes. Providers are to report to the Trust on any individual who refuses services due to data collection requirements and along with their specific concerns.~~
- 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 ~~Examples might~~ include surveys, focus groups, interviews, other qualitative data collection, ~~and consent to release data to/from third parties.~~ 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. Participation of program participants is voluntary, and participants may refuse to participate.

- 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 seeks to hear from as many participants as possible and have data be representative and complete to increase credibility and confidence about findings drawn from the data. The Trust would like to see completion rates of 70% or higher for participants taking part 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. intensity of services.

SECTION 3

How is data collected?

Personally identifying data 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, on which providers would receive training. The Trust will develop a consent statement and process that informs participants why information is being collected and how it will be used.

Commented [BW2]: This was moved to "Section 5 - How do we secure data?"

Commented [BW3]: This was moved to "Section 3 - How do we inform participants?"

Informing Participants

The Trust strives to keep participants informed about our data collection and management through the following practices:

- Providers collecting personally identifiable information (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 it to the Trust.
- The Trust will provide a short consent statement to include the following: (1) why the information is being collected, (2) how it will be used, (3) how it will be protected.

Commented [BW4]: Moved up to "Section 3 - How do we inform participants?"

- ~~This data collection and management policy will be available on the Trust's website along with a staff contact listed to express any questions, concerns, or grievances.~~

SECTION 45

How do we secure data information?

The Trust recognizes the importance of protecting personal information of children and families who participate in our 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 ~~in order to~~ safeguard data collected on children and families:

- ✓ Ensure data is encrypted while at rest and in transit.
- ✓ ~~Data is encrypted while at rest and in transit.~~
- ✓ Routinely complete an external security audit.
- ✓ Maintain an audit trail of system access.
- ✓ ~~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 (such as, 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 providers and its staff adhere to the following practices in order to safeguard data collected on children and families:

- ✓ All data system users must will commit to protect the data in a manner that does not permit the personal identification of program participants by unauthorized persons, and will complete a Data System User Agreement at initial log in and every year thereafter.

- ✓ 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.
- ✓ ~~Report and/or terminate data system access immediately upon staff separation from employment.~~
- ✓ Devices used for data system access must have a password.
- ✓ ~~Report any device theft, or account compromise.~~
- ✓ 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~~for whom the Trust partners ~~we partner~~ to achieve mutual goals to benefit children and families. Prior to sharing any data with external organizations, the Trust would ensure the following practices:~~Data sharing with organizations would necessitate engaging in the following practices:~~

- External data sharing decisions consider the purpose and intention and weigh both the risks and benefits posed.
- ~~Develop a clear purpose and intention for any external data sharing which weighs benefits alongside risks,~~
- Appropriate data security safeguards are employed to minimize risks.
- ~~Minimize risks through implementing appropriate data security safeguards,~~
- Research or evaluations conducted by external organizations use only deidentified data from the Trust.

Commented [BW5]: This is now sequenced after the data security section.

- ~~Research or evaluation performed by third parties using Trust data is conducted with deidentified data,~~
- 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, pseudolDs, and other tokens.
- ~~If there is an interest in linking Trust data with external dataset to examine program or system impacts that the analysis is done by the Trust and the amount of identified information released is the minimum required for data matching, and potentially done so by using IDs, pseudolDs, and other tokens.~~

SECTION 5.7

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. TBD per DTAC discussion on July 28, 2022