

**HEAD START PROCEDURES FOR:
VIOLATING ELIGIBILITY DETERMINATION REGULATIONS
COMPONENT: CENTER FOR YOUNG LEARNERS**

1.0 Scope: Performance Standard 1303 Subpart C – Protections for the Privacy of Child Records (1302.20;1303.21;1303.22;1303.23;1303.24)

A program must establish procedures to protect the confidentiality of any personally identifiable information (PII) in child records.

2.0 Responsibility:

- 2.1 Head Start Director
- 2.2 ESC/ISD Head Start Staff

3.0 Resources:

- 3.1 Head Start Performance Standards

4.0 Procedures:

- 4.1 The grantee will ensure the confidentiality of children and family information.
 - 4.1.1 Only Head Start staff and authorized personnel will have access to child records. Staff will sign “Sign In Sheet” when accessing child files.
Exceptions to include child care licensing and interns (approved by Region 14 ESC Head Start). A Head Start staff will monitor the child care licensing agency/intern if accessing records are needed. Interns will receive Orientation training.
 - 4.1.2 Written records will be kept in a locked filing cabinet.
 - 4.1.3 Electronic records will be password protected. Staff will not share passwords with another staff member or anyone outside of Head Start.
- 4.2. Grantee will only disclose information to an outside agency with parental consent through written consent, electronic consent, and verbal consent. If verbal consent, the agency will document and then obtain written consent. Consents will be signed and dated and reviewed annually.
 - 4.2.1 Information disclosed will include the name of the agency of information to be disclosed.
 - 4.2.2 Specific Information to be disclosed.
 - 4.2.3 Parents will be informed that consent is voluntary and may be revoked at any time.
- 4.3. The grantee may only disclose information to another agency if it deems it necessary to protect the health and safety of the child. An example may include seeking medical assistance or Child Protective Services.
- 4.4. Parents have the right to inspect their own child’s records.

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- 4.4.1 If parent(s) request to review their own child’s records, grantee will allow with Head Start staff present.
- 4.4.2 If parent(s) request copies of records, grantee will allow only those records from Head Start. Information from other agencies will need to be requested by the parent from that agency.
- 4.4.3 Parent(s) have the right to amend records if a parent believes it is inaccurate, misleading or violates the child’s privacy.
- 4.5. The grantee will maintain written child records for seven years.

5.0 Associated documents:

- 5.1. Head Start Performance Standards

6.0 Record Retention Table:

Identification	Format	Storage	Retention	Disposition	Protection
Records	Print	Locked cabinet	7 years	Shredded	Back-up
Electronic records	Electronic	Password protected		Deleted	

7.0 Monitoring:

- 7.1 File Review
- 7.2 Consents

8.0 Revision History:

Date:	Revision#	Description of Revision
2/2017		
5-2018		Reviewed
6-2018	4.1., 6.0	Add “and authorized personnel” Add “ Deleted”
6-2019		Reviewed
4-2022		Reviewed
12/2022		Reviewed