ANNUAL NOTICE REGARDING PII AND PARENTAL RIGHTS

THIS NOTICE DESCRIBES HOW PERSONALLY IDENTIFIABLE INFORMATION ABOUT YOUR CHILD MAY BE USED AND DISCLOSED, AND HOW YOU CAN ACCESS THIS INFORMATION.

PLEASE REVIEW IT CAREFULLY.

By law, WCMCA Head Start must protect the privacy of your child's Personally Identifiable Information. Information that could be used to identify your child (known as "Personally Identifiable Information" or "PII") includes your child's name, name of a child's family member, street address of the child, social security number, or other information that is linked or linkable to the child. WCMCA Head Start retains PII because your child receives Head Start/Early Head Start services from us and it is a part of each child's record with us. We take our obligation to protect the privacy of your child's PII data very seriously. This notice explains your rights and our legal duties and privacy practices.

We are required to give you a copy of your rights in writing every year, including definitions (which cover descriptions of the types of PII that may be disclosed), to whom we can disclose, and list when we do not need to receive your Consent to disclose PII from your child's record.

WCMCA Head Start will abide by the terms of this notice. Should our data and child record practices materially change, WCMCA Head Start reserves the right to change the terms of this notice, and will follow the terms currently in effect. Any new provisions we add will affect all PII we maintain from the time the new provisions go into effect, as well as any PII that we may receive in the future. If we revise our practices substantially, we will provide a revised notice and will post the updated notice on our website at WCMCA Head Start.

Definitions

Child Records means records that: (1) are directly related to the child; (2) are maintained by the program, or by a Party acting for the program; and (3) include information recorded in any way, such as print, electronic, or digital means, including media, video, image, or audio format.

Confidential means to be kept private with certain specific protections.

Consent means written approval or authorization that is signed and dated. It may include a record and signature in electronic form that: (1) identifies and authenticates a particular person as the source of the electronic Consent; and, (2) indicates the same person's approval of the information. Consent can be revoked going forward.

Disclosure means to permit access to or the release, transfer, or other communication of Personally Identifiable Information contained in Child 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.

Party means an entity or individual.

Parent means person or agency legally authorized to act on behalf of the child, typically mother, father, or legal guardian authorized to act in place of the mother or father.

Personally Identifiable Information (PII) means any information that could identify a specific individual, including but not limited to a child's name, name of a child's family member, street address of the child, social security number, or other information that is linked or linkable to the child.

Required Uses and Disclosures of PII

We must use and disclose information contained in Child Records that is PII in a number of ways to carry out our responsibilities. We keep PII in our Child Records. The following list describes the types of uses and Disclosures of PII that federal law requires WCMCA Head Start to make and allows us to do so without your Consent:

- ✓ Within this organization for Head Start purposes;
- ✓ To other organizations for Head Start purposes (including but not limited to Contractors, Consultants or Delegates/Sub-Recipients that help us provide services to your child);
- ✓ In connection with an audit or evaluation of education or child development programs or for enforcement or compliance with federal legal requirements (such as to the U.S. Department of Health and Human Services that funds our work);
- ✓ For studies to improve child or family outcomes or quality of services;
- ✓ During Disasters or Health/Safety Emergencies to appropriate Parties (including but not limited to local health departments, police, fire, EMS, etc.);
- ✓ Pursuant to Court Orders or Subpoenas (so long as we try to notify you in advance unless (1) a court has ordered that neither the subpoena, its contents, nor the information provided in response be disclosed; (2) the Disclosure is in compliance with an ex parte court order obtained by the United States Attorney General or his/her delegate 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; (3) a Parent is a Party to a court proceeding directly involving child abuse and neglect or dependency matters, and the order is issued in the context of that proceeding; or (4) if there is legal action between WCMCA Head Start and a Parent);
- ✓ For Child and Adult Care Food Program (CACFP) Monitoring if the results will be reported in an aggregate form that does not identify any individual;
- ✓ To Foster Care Caseworkers who have the right to access a case plan for a child who is in foster care placement; and,
- ✓ To appropriate Parties in cases of suspected or known child maltreatment (such as Child Protective Services).

WCMCA Head Start also uses and shares your child's PII when requested by you or when otherwise required by law.

Other Permitted Uses and Disclosures

You may give us written Consent to use or disclose any information created by WCMCA Head Start to anyone for any purpose that you choose. You may revoke your authorized Consent so long as you do so in writing; however, WCMCA Head Start will not be able to get back any information we have already used or shared based on your prior permission.

Parental Rights

You have the right to:

- ✓ Ask to inspect your Child's Record on-site containing PII that WCMCA Head Start maintains. WCMCA Head Start will create an opportunity for you to inspect your Child's Record within 45 days. You *do not* have the right to remove the original record from on-site nor to take any parts of the original record with you.

- ✓ Ask for a copy of Child Records disclosed to third Parties with Parental Consent, free of charge.

- ✓ Ask WCMCA Head Start to amend your Child's Record if you believe that it is inaccurate, misleading, or violates your child's privacy. You must ask for this by in writing, along with a reason for your request. WCMCA Head Start will review your request and decide on it within [insert number of days here and make sure it mirrors what you included in the procedure] days. If WCMCA Head Start denies your request to amend your PII, we will issue you a written statement explaining why and explain your right to a hearing.

- ✓ Ask for a hearing if your request to amend the Child Record is denied. If the issue is not decided in your favor at the hearing, you have the right to place a statement in the Child Record that either comments on the contested information or that states why the Parent disagrees with the program's decision, or both.

- ✓ Ask to inspect written agreements involving Disclosure of PII. If a Parent requests, you can come on-site and review a redacted written agreement with a third Party that involves Disclosure of their child's PII. This right does not allow you to take any photos of it or make, or have copies made of the agreement.

Complaints or Questions

If you believe that your child's privacy rights may have been violated or if you have questions, please let us know as soon as possible. Complaints should be directed to:

WCMCA Chief Executive Officer
411 Industrial Park Blvd., Elbow Lake MN 56531
Email Address: missyb@wcmca.org

Filing a complaint or exercising your rights will not affect the care or services your child receives from WCMCA Head Start.