



South Carolina
**Early Childhood
Advisory Council**

Meeting of the Early Childhood Advisory Council

October 17, 2024, immediately following the SC First Steps Board Meeting
SC First Steps
636 Rosewood Drive Columbia, SC 29201

AGENDA

I. Call to Order and Approve Agenda

Motion: To adopt the agenda as submitted.

II. Meeting Minutes

Motion: To approve ECAC Minutes of August 15, 2024

Attachment: August 15, 2024, Minutes

III. Early Childhood Integrated Data System Policies (Molly Tuck)

Motion: To approve the Data Analysis and Reporting Policy (*Action requires motion and second*)

Attachment: Data Analysis and Reporting Policy

Motion: To approve the Data Destruction Policy (*Action requires motion and second*)

Attachment: Data Destruction Policy

Motion: To approve the Privacy and Confidentiality Policy (*Action requires motion and second*)

Attachment: Privacy and Confidentiality Policy

Motion: To approve the Data Quality Policy (*Action requires motion and second*)

Attachment: Data Quality Policy

Motion: To approve the Data Scope and Management Policy (*Action requires motion and second*)

Attachment: Data Scope and Management Policy

Motion: To approve the Access and Acquisition Policy (*Action requires motion and second*)

Attachment: Access and Acquisition Policy

For context and details about early childhood data,

<https://www.earlychildhoodsc.org/what-we-do/sc-early-childhood-integrated-data-system/>

IV. Agency Leaders Provide Updates on Matters Relating to the Early Childhood System

V. Information

- a. Report on Interagency Coordinating Committee (Amber Gillum)

Attachment: ICC September 17 Meeting Summary

- b. ECAC Report on Activities (Mark Barnes)

Attachment: ECAC October 2024 Report

VI. Adjourn Motion: To adjourn the meeting of the Early Childhood Advisory Council



Early Childhood Advisory Council Meeting

August 15, 2024, immediately following the SCFS Board of Trustees Meeting
SC First Steps
Minutes

Council Members Present (16):

Mary Lynne Diggs
Rep. Shannon Erickson
Dr. Matthew Ferguson
John Hayes
Sen. Greg Hembree
Mike Leach
David Lisk
Dave Morley, Chairman
Janie Neeley

Dorothy Priester
Roger Pryor
Mary Anne Scott
Dr. Edward Simmer
Wes Wooten
Dr. Amy Williams, Vice Chair
Sue Williams

Council Members Absent (9):

Rep. Terry Alexander
Dr. Robert Bank
Jacque Curtin
Constance Holloway
Robert Kerr
Jessica Mackey
Sen. Gerald Malloy
Jack McBride
Dr. Brenda Williams

Attendees (75)

Mark Barnes
Avian Jones
Alissa Durham
Alonzo Johnson
Amanda Bailey
Amber Gillum
Amy Breault
Anita Ellison Porter
Anna Layton
April Cromer
Arthur Brewton
Barbara Casper
Berry Kelly
Betty Washington
BJ Norris Long
Brian Butler
Chelsea Adamson
Chelsea Richard
Cheryl Scales
Cindy Galloway
Cindy Hurst
Cindy Riley
Crystal Williams
Darlyene Gillie
David Lisk
David O'Kelly

Dorian Young
Elaine Gentry
Elizabeth Dudek
Emma Matzko
Felicia O'Neal
Francis Rushton
Gina Beebe
Harriett Clarke
Jaiden Branch
Janice Kilburn
Jeanette Samuel
John Browne
Jon Artz
Joy Mazur
Julie Greer
Kaitlyn Richards
Karen Oliver
Kate Roach
Kathy Fitzgerald
Kenna Hoover
Kerry Cordan
Kristen Martocchio
Kristine Jenkins
LaKesha Meredith
Lamikka Samuel
LaMyra Sanders-Dukes

Lexi Jones
Lis Guimaraes
Maebelle Williams
Martha Strickland
Melissa Griffin
Mildred Daniels
Patricia McRoy
Pauletta Plowden
Pauline Whiting
Rachel Amrhein
Renee Williams
Rudilly Dubose
Sabrenna Long
Salisa McTeer
Sarah Eargle
Shannon Allen
Shayla Pettigrew
Sheila Cornwell
Stacy Greenwalt
Tiffany Outlaw
Tyshica McConner
Veronica Reynolds
Victoria Belin



The meeting was called to order at 2:48 p.m.

Mr. Lisk provided the motion to adopt the agenda, seconded by Mr. Wooten, and the motion was unanimously approved.

Mr. Lisk provided a motion to approve the June 20, 2024 minutes. Dr. Simmer asked that we verify a motion that he made in the minutes. With that amendment, the motion was seconded by Mr. Wooten, and the motion was unanimously approved.

Dr. Richard provided context about the early childhood integrated data system policy statements and the Data Use Policy. Dr. Simmer made a motion to approve the Data Use Policy, seconded by Mr. Wooten. Mr. Morley entered discussion about departmental use and timeliness of approvals. Dr. Richard shared the roles and responsibilities in the SC ECIDS Data Governance Manual that addresses the timeliness of approvals. Mr. Morley amended the motion to approve the Data Use Policy and to include the modifications to the SC ECIDS Data Governance Manual. The motion was approved by Dr. Williams and seconded by Mr. Lisk. There was more discussion raised by Mr. Lisk and Mr. Leach. The motion was unanimously approved.

Dr. Ferguson provided an update on the rollout of SC LETRS. He shared that 9,000 K-3 teachers are enrolled and 42 professionals from 16 education prep programs are participating in SC LETRS.

Mr. Leach shared that DSS introduced the launch of Military Child Care in Your Neighborhood Plus (MCCYN-Plus) where the Department of Defense will provide fee assistance to military and DoD civilian families in SC and to ABC Quality providers with a rating of B or higher. He shared that DSS has provided additional operating grants to providers. As of July 26, 2024, DSS has approved more than \$115 million in expansion grants and 1,807 providers have received those grants. DSS has provided \$12.7 million dollars in one time wage supplements to over 9,500 child care professionals through the SC Boost program.

Dr. Simmer shared the split of DHEC to Department of Public Health and the Department of Environmental Services is complete. He shared that there are 2 major divisions within the Department of Public Health. The Health Promotion and Services division focuses on community health and well-being by working to prevent and address disease as early as possible and providing access to quality care through the health departments. The Health Care Quality division focuses on patient safety and ensuring health care facilities across the state provide high quality care. DPH is focusing on increasing their community outreach and engagement efforts. With expanded funding from the legislators DPH will also be working with facilities on ways to improve and will be posting facility inspections online. In May, for the first time since COVID, DPH was able to serve over 100,000 families through the WIC program that month. He shared their success with First5SC where they received over 500 applications.

Ms. Williams shared the success of the SCParents.org website launch. There is now a Parent Advisory Council section within the website where parents can talk with other parents. They are also recruiting volunteers for blog posts. She shared information on their upcoming conference in Greenville and that Children's Trust will now partner to complete the Youth Risk Behavior



Surveillance Survey for the stated. Ms. Williams shared that all 7 home visiting models are now available on the First5SC portal.

Ms. Gillum shared that another round of grant applications for PDG were submitted at the end of July. If awarded, South Carolina would receive \$8 million for 3 years. Only 10 states in the county will be awarded this grant and states would be made aware by September 30th.

Ms. Barnes reported on the activities of the ECAC. He provided an update on Palmetto PreK analytics and First Five SC analytics. He pointed out that 62% of applicants accessed First5SC after normal work hours. He reminded everyone about the Summit on Early Childhood on December 5th and thanked all Summit sponsors. He shared that there is a video that will be released at the Summit about the Two-Gen approach to family services. He also shared information about the success of the Palmetto Jamboree and the 4K Academy.

Ms. Diggs shared that the national priorities for Head Start collaboration offices have been merged. As of August 14th they noted that whereas Head Start collaborates with state systems, they are to align early care and education services supporting children and families prenatally, and to age 5. She also shared that they have been assigned to work with state efforts to collect and use data on early childhood programs to guide decision making and improve child and family outcomes. She stated that Head Start is to support the expansion of access of high quality workforce and career development by working with professional development systems, including workforce registries and career pathways with an emphasis on institutions of higher learning to promote the expansion of career opportunities.

Mr. Lisk made a motion to adjourn the meeting, seconded by Dr. Simmer, and approved unanimously.

The meeting adjourned at 3:29 p.m.

SC ECIDS DATA GOVERNANCE MANUAL

Number: Title	Data Analysis and Reporting Policy		
Approved by		Approved Date	

POLICY STATEMENT

The South Carolina (SC) Early Childhood Advisory Council (ECAC), as the governing body of the South Carolina Early Childhood Integrated Data System (ECIDS), wants SC ECIDS data to be analyzed and reported so that more South Carolinians can better understand the experiences of young children and their families during these early years. To do so, the ECAC is committed to the appropriate and responsible analysis and reporting of SC ECIDS data so that takeaways are understood as intended.

PURPOSE

The purpose of this policy is to describe the requirements by which SC ECIDS data can be analyzed or reported to ensure appropriate interpretation. The policy outlines the considerations data users must have during analysis and reporting to ensure SC ECIDS are being used appropriately and responsibly. This policy does not address the SC ECIDS Data Suppression Policy, which is outlined in the “Data Privacy and Confidentiality Policy.” The policy also does not provide information on the data request process (see “Data Access and Acquisition Policy”). This policy does ensure that data and data products from the SC ECIDS framework have been validated by the appropriate individuals and/or entities and have been created in accordance with SC ECIDS reporting standards for data privacy, quality, and consistency over time.

SCOPE

This policy applies to all data collected, processed, and stored within the SC ECIDS initiative, including but not limited to personally identifiable information (PII), sensitive educational records, research data, and administrative data.

DEFINITIONS

- **Participating programs** are programs that regularly contribute data to SC ECIDS. Participating programs have data stewards, who are responsible for managing and maintaining data quality within their program.
- **External/authorized users** are individuals or entities granted access to ECIDS data for legitimate purposes, including researchers, policymakers, program administrators, and other stakeholders involved in early care and education.
- **Sensitive educational records** include data or information that are collected and stored for educational purposes that individual(s) may not want to be shared with others or could contain information that may cause harm to the individual
- **Research data** are pieces of information that are collected for the purposes of conducting research or answering a research question, which could include data that have been adjusted based on administrative data or primary data collected for the purposes of conducting research
- **Administrative data** is information about individuals or program operations that are collected and maintained as a part of the functioning of a service or program
- **Data sharing agreements (DSA)** are formal contracts or agreement between data owners and the SC ECIDS. This agreement outlines the terms and conditions under which data may be

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accessed, used, and disclosed, as well as the rights and responsibilities of each party with respect to the data.

ROLES AND RESPONSIBILITIES

- External/authorized users are responsible for abiding by SC ECIDS data analysis and reporting guidelines.
- The DGWG is responsible for outlining the data analysis and reporting guidelines that aligned with participating programs' analysis and reporting guidelines and meet the needs of SC ECIDS data and ensuring that external/authorized users are following the data analysis and reporting guidelines, escalating any issues up to the ECAC.

PROCESS AND GUIDELINES

1. DGWG Process to Determine Guidelines

- a. The DG Coordinator compiles information across participating programs around data analysis and reporting guidelines.
- b. The DGWG, SCDE, RFA, and DG Coordinator align expectations across participating programs and determine a final set of expectations for SC ECIDS data that meet the guidelines for each participating program.
- c. The DGWG determines if there are other federal, state, or local regulations about data analysis and reporting.
- d. The DG Coordinator communicates data reporting and analysis guidelines with external/authorized users of SC ECIDS data by coordinating the inclusion and updating of these guidelines on the ECAC Data Hub website.
- e. The DGWG, supported by the DG Coordinator, periodically reviews the data analysis and reporting guidelines to identify issues or areas of improvement. As outlined in the Data Scope and Management Policy, all changes will be communicated to the ECAC by the DG Coordinator in the Board of Trustees Meeting Report.
- f. The DGWG develops processes by which data analysis and reporting issues are addressed, escalated, and resolved; this may occur by proxy of a Data Analysis and Reporting Issue Project Team, if notified of a data analysis and reporting issue, the DGWG may:
 - i. Require the party involved to investigate and respond to questions regarding the incident.
 - ii. Require the party involved to promptly resolve any issues or issue corrections.
 - iii. Request the formation of a Data Analysis and Reporting Issue Project Team (See "Establishment of Project Teams Policy") to develop further solutions.
 - iv. Restrict an external/authorized user's access to SC ECIDS data assets in the future, if the party involved fails to comply with response processes or is found to intentionally violate SC ECIDS policies.

2. General Data Analysis and Reporting Guidelines

- a. **Data Use Restrictions:** SC ECIDS external/authorized users are prohibited from re-identifying individuals from anonymized data, sharing data with unauthorized parties,

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and using data for purposes unrelated to early care and education or purposes unrelated to the study proposal approved in the data request application. The DGWG may identify further restrictions upon compiling information across participating programs.

- b. **Ethical Considerations:** SC ECIDS external/authorized users must ensure the privacy and dignity of individuals represented in the data, avoid bias or discrimination in analysis and reporting of SC ECIDS data, and maintain transparency and accountability in reporting practices, as outlined in the reporting guidelines of this policy. The DGWG may identify further ethical considerations upon compiling information across participating programs.
- c. **Compliance and Oversight:** External/authorized users with access to SC ECIDS data must comply with all applicable processes, procedures, and guidelines outlined in the Data Governance Manual. If any violations or breaches of SC ECIDS policies occur, external/authorized users must notify the DG Coordinator and the technical lead(s) associated with the Data Package (see “Data Access and Acquisition Policy”) of the incident in writing no later than three business days after learning of the violation or breach. The DG Coordinator will share the incident with the DGWG and the ECAC, as necessary.

3. Data Analysis Guidelines

- a. **Analysis methods:** External/authorized users are expected to utilize statistical or analytical techniques that protect personally identifiable information and adequately address the study proposal approved in the data request application when analyzing SC ECIDS data. These techniques can include, but are not limited to, descriptive statistics, regression analysis, longitudinal analysis, or machine learning algorithms.
- b. **Quality assurance:** External/authorized users are expected to verify the accuracy and reliability of ECIDS analysis results, through techniques such as validation checks and sensitivity analyses, prior to disseminating findings.

4. Reporting Guidelines

- a. **Data Disclaimer:** Any reports to be released with SC ECIDS data must contain the following statement "The research presented here uses data from the South Carolina Early Childhood Integrated Data Systems, governed by the South Carolina Early Childhood Advisory Council (SC ECAC). The views expressed here are those of the authors and do not necessarily represent those of the SC ECAC or other data contributors. Any errors are attributable to the authors."
- b. **SC ECIDS Data Citation:** Any reporting of SC ECIDS data or dissemination of analysis using SC ECIDS data must include appropriate citations to the dataset(s).
- c. **SC ECIDS Data Product Citations:** Users of ECIDS data products found on the SC ECAC Data Hub, such as graphs, tables, and dashboards, must include appropriate citations to the data product.
- d. **Pre-Dissemination Manuscript and Report Review:** Participating programs may require review and approval before the public release of findings using that program’s data. External/authorized users of SC ECIDS data are required to read and follow all applicable participating programs’ pre-dissemination review policies when using SC ECIDS data. Additionally, when approving data requests, programs can indicate on the data request decision form (see the “Data Access and Acquisition Policy”) if the program has pre-

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dissemination review policies and where the external/authorized user can find information on those policies, which will be shared with the data requestor.

- e. **Data Dissemination Reporting:** External/authorized users of SC ECIDS data are required to send the DG Coordinator bibliographic citations for published manuscripts, reports, or thesis abstracts containing SC ECIDS data or SC ECIDS data analysis. The DG Coordinator will continually share SC ECIDS publication count updates with the DGWG and the ECAC using the Board of Trustees Meeting Report.

RELATED POLICIES

- Data Privacy and Confidentiality Policy
- Data Access and Acquisition Policy
- Data Scope and Management Policy
- Establishment of Project Teams Policy

REVISION HISTORY

Responsible Party	Reason for Change	Date	Version
Molly Tuck	Revision of policy shared with DGWG	September 25, 2024	1.1
Molly Tuck	Initial version of policy	September 4, 2024	1.0

SC ECIDS DATA GOVERNANCE MANUAL

Number: Title	Data Destruction Policy		
Approved by		Approved Date	

POLICY STATEMENT

The South Carolina (SC) Early Childhood Advisory Council (ECAC), as the governing body of the South Carolina Early Childhood Integrated Data System (ECIDS), understands that responsible use of SC ECIDS data also includes the responsible destruction of SC ECIDS data by external entities after their approved use.

PURPOSE

The purpose of this policy is to provide the necessary details about how external/authorized data users are to destroy data securely and responsibly after approved use. This policy applies to data acquired by the process outlined in the “Data Access and Acquisition Policy” and not the data referenced in the “Data Use Policy.” This policy applies to all data stored within the SC ECIDS, including but not limited to personally identifiable information (PII), sensitive records, and research data.

SCOPE

This policy applies to all data collected, processed, and stored within the SC ECIDS initiative, including but not limited to personally identifiable information (PII), sensitive educational records, research data, and administrative data.

DEFINITIONS

- **Personally Identifiable Information (PII)** is any data that could potentially identify an individual, including names, addresses, social security numbers, or other identifying information.
- **Sensitive educational records** include data or information that are collected and stored for educational purposes that individual(s) may not want to be shared with others or could contain information that may cause harm to the individual
- **Research data** are pieces of information that are collected for the purposes of conducting research or answering a research question, which could include data that have been adjusted based on administrative data or primary data collected for the purposes of conducting research
- **Administrative data** is information about individuals or program operations that are collected and maintained as a part of the functioning of a service or program
- **Participating programs** are programs that regularly contribute data to SC ECIDS.
- **External/authorized users** are individuals or entities granted access to ECIDS data for legitimate purposes, including researchers, policymakers, program administrators, and other stakeholders involved in early care and education.

ROLES AND RESPONSIBILITIES

- External/authorized users are responsible for abiding by SC ECIDS data destruction policies.
- DGWG is responsible for outlining, monitoring, and maintaining data destruction guidelines for SC ECIDS data.

PROCESS

1. SC ECIDS initiatives follow the data retention and destruction protocols of the agency or organization in which the data initiative is housed, as outlined in the DSAs, and the agencies from which data are received.

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2. The DGWG and technical lead(s) of each ECIDS initiative align data destruction guidelines for external/authorized users across participating programs and develop approved data destruction procedures for external/authorized users of the ECIDS data, including:
 - a. Secure Destruction Methods: The DGWG identifies approved methods (e.g., data destruction software) for destroying data to ensure it is irrecoverable and unreadable. Clarify methods for both electronic data and, if applicable, physical media (e.g., paper documents, flash drives). Upon approval, these methods will be listed as an appendix to this policy for external/authorized users' reference. Data requestors are required to share how they will follow these pre-approved methods in their data access request application.
 - b. Certification and documentation of destruction: The DGWG decides whether and how data destruction should be documented and/or certified. If destruction logs are required, the DGWG provides information on what information must be recorded (e.g., date, time, location, and method of destruction), whether the documentation must be certified by a third party, and for how long the destruction records must be maintained. Upon DGWG approval, these decisions will be communicated as an appendix to this policy for external/authorized users' reference.
3. The DG Coordinator communicates data destruction guidelines with external/authorized users of SC ECIDS data by coordinating the inclusion and updating of these guidelines on the ECAC Data Hub website.
4. The DGWG, supported by the DG Coordinator, periodically reviews the data destruction guidelines to identify issues. As outlined in the Data Scope and Management Policy, all changes will be communicated to the ECAC by the DG Coordinator in the Board of Trustees Meeting Report.

PROCEDURE FOR REPORTING DATA DESTRUCTION ISSUES

1. If an external/authorized user or participating program identifies a data destruction issue that affects SC ECIDS data, they will immediately notify the DG Coordinator in writing via email.
2. The DG Coordinator will notify the relevant technical leads and affected participating programs of the issue via email.
3. The DG Coordinator, technical lead(s), and affected participating programs will work with the external/authorized user to address the data destruction issue.
3. Any member of the DGWG may request the formation of a Data Destruction Issue Project Team (See "Establishment of Project Teams Policy") to further identify solutions to the issue.
4. The DG Coordinator will document all ongoing issues for the annual review of DGWG procedures and processes.

RELATED POLICIES

- Data Access and Acquisition Policy
- Data Scope and Management Policy
- Establishment of Project Teams Policy

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REVISION HISTORY

Responsible Party	Reason for Change	Date	Version
Molly Tuck	Revision of policy shared with DGWG	September 25, 2024	1.1
Molly Tuck	Initial version of policy	September 4, 2024	1.0

SC ECIDS DATA GOVERNANCE MANUAL

Number: Title	Data Privacy and Confidentiality Policy		
Approved by		Approved Date	

POLICY STATEMENT

The South Carolina (SC) Early Childhood Advisory Council (ECAC), as the governing body of the South Carolina Early Childhood Integrated Data System (ECIDS), is fully committed to ensuring that any information on young children, their families, or the programs and services in which they participate is kept private and confidential when used by external entities. Information from the SC ECIDS initiatives should be used to make decisions at a group or population level so that multiple young children, families, or programs can benefit. If the integrity or effectiveness of the SC ECIDS security measures or data is compromised, ECAC staff and the DGWG will take immediate corrective actions to mitigate the problems based upon applicable response processes. The ECAC will also be notified of any corrective actions within 3 business days.

PURPOSE

The purpose of this policy is to document how the SC ECIDS framework will ensure data assets are continually kept private, confidential, and secure when shared, used, or reported, as required by federal and state privacy and confidentiality laws. This policy allows the public to have confidence in the processes set up to protect data on children, families, and programs. This policy does not detail how external/authorized users access the data, as outlined in the "Data Access and Acquisition Policy."

SCOPE

This policy applies to all data collected, processed, and stored for each of the SC ECIDS initiative, including but not limited to personally identifiable information (PII), sensitive educational records, research data, and administrative data.

DEFINITIONS

- **Personally Identifiable Information (PII)** is any data that could potentially identify an individual, including names, addresses, social security numbers, or other identifying information.
- **Sensitive educational records** include data or information that are collected and stored for educational purposes that individual(s) may not want to be shared with others or could contain information that may cause harm to the individual.
- **Research data** are pieces of information that are collected for the purposes of conducting research or answering a research question, which could include data that have been adjusted based on administrative data or primary data collected for the purposes of conducting research.
- **Administrative data** is information about individuals or program operations that are collected and maintained as a part of the functioning of a service or program.
- **Participating programs** are programs that regularly contribute data to SC ECIDS.
- **External/authorized users** are individuals or entities granted access to ECIDS data for legitimate purposes, including researchers, policymakers, program administrators, and other stakeholders involved in early care and education.
- **Data sharing agreements (DSA)** are formal contracts or agreement between data owners and the SC ECIDS. This agreement outlines the terms and conditions under which data may be accessed, used, and disclosed, as well as the rights and responsibilities of each party with respect to the data.

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- **Data breaches** are any incident in which unauthorized parties access, or obtain the ability to access, data that infringes upon the confidentiality and/or privacy of the data sources.

ROLES AND RESPONSIBILITIES

- **Participating programs** are responsible for submitting data stewards to serve on the Data Governance Work Group (DGWG), who are responsible for managing and maintaining data privacy and confidentiality standards specific to their program.
- **External/authorized users** are responsible for abiding by SC ECIDS data privacy and confidentiality policies.
- The **DGWG** is responsible for outlining, monitoring, and maintaining data privacy and confidentiality guidelines for SC ECIDS data.
- The **Data Governance (DG) Coordinator** is responsible for facilitating and managing decisions and recommendations of each DGWG, enabling decision-making, and aiding in issue resolution.

PROCESS

- The DGWG data stewards will compile information from their participating programs around data privacy and confidentiality guidelines which will be shared with the DG Coordinator.
- The DGWG data stewards will determine if there are other federal, state, or local regulations about data privacy and confidentiality (e.g., FERPA or HIPAA) related to their participating program's data which will be shared with the DG Coordinator.
- The DGWG, facilitated by the DG Coordinator, will align expectations across participating programs within the parameters of the privacy and confidentiality policies of the appropriate technical lead(s) as outlined in the DSAs (for example, see the SC Department of Education (SCDE) Security Policies for the Early Learning Extension (ELE) initiative).
- The DG Coordinator will develop processes for communicating these guidelines with the ECAC, DGWG, participating programs, and any external/authorized users of SC ECIDS through the ECIDS Data Hub website.
- The DGWG will abide by the data suppression, data storage, and data breach processes to support privacy, security, and confidentiality under the SC ECIDS framework.

DATA SUPPRESSION

- Any report or other publication produced within the SC ECIDS framework must use appropriate disclosure avoidance techniques to protect individually identifiable information. No cell, table or text discussion can include information that pertains to 10 or fewer children or families.
 - Complementary suppression of non-sensitive cells may also be required so that suppressed values of 10 or fewer cannot be calculated by subtracting reported values from row and/or column totals.
- Based on the specifics of the analysis, additional disclosure avoidance techniques such as aggregation across categories may be necessary. Data users should consult with the DG Coordinator in these cases.
- Reports and publications using data assets from SC ECIDS initiatives produced by external/authorized users are subject to additional pre-submission review (see "Data Analysis and Reporting Policy") to ensure adequate data suppression.

DATA STORAGE

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- Data requesters and users will adhere to best practices for storage and encryption of data to minimize any risk of data being transmitted to an unauthorized person or location.

DATA BREACH RESPONSE PROCEDURE

- If a data breach is suspected or occurs within an SC ECIDS application:
 - The technical lead(s) will notify the DG Coordinator.
 - The DG Coordinator will notify the ECAC and DGWG members from the impacted participating programs within three business days of learning of the incident.
 - Because data is being stored with the technical leads of each SC ECIDS initiative, the response process will follow the processes and procedures outlined in the privacy and confidentiality policies of the technical lead(s) and will be supported by ECAC staff.
 - The technical leads, with support from the DG Coordinator and ECAC staff, will be responsible for making any public notices of data breaches needed beyond those covered by their own privacy and confidentiality policies.
 - The DG Coordinator, in collaboration with the technical lead(s) and ECAC staff, will notify impacted participating programs and the ECAC of corrective actions within three business days.
- If an external/authorized user or participating program is involved in a data breach related to an SC ECIDS initiative:
 - The party must report it to the DC Coordinator within three business days from the date they were made aware of the breach.
 - The DG Coordinator will notify the appropriate technical lead(s), the DGWG, and the ECAC within three business days.
 - The DGWG, in conjunction with the technical lead(s) and ECAC staff, may require the party involved to investigate and respond to questions regarding the data breach.
 - The DGWG, in conjunction with the technical lead(s) and ECAC staff, may require the party involved to promptly resolve any issues uncovered by the investigation.
 - Members of the DGWG or the DG Coordinator may also request the formation of a Data Breach Project Team (See “Establishment of Project Teams Policy”) to devise long-term solutions to issues uncovered in the investigation, if applicable.
 - The DGWG, in conjunction with the technical lead(s) and ECAC staff may require the party involved to submit a corrective plan with steps to prevent any future unauthorized disclosures or data breaches.
 - If the party involved fails to comply with response processes, the DGWG and/or technical lead(s) may restrict their access to SC ECIDS data assets in the future.
 - The DG Coordinator, in collaboration with the technical lead(s) and ECAC staff, will notify impacted participating programs and the ECAC of corrective actions.

RELATED POLICIES

- Data Access and Acquisition Policy
- Data Scope and Management Policy
- Data Analysis and Reporting Policy
- [SCDE Security Policies](#)

REVISION HISTORY

Responsible Party	Reason for Change	Date	Version
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SC ECIDS DATA GOVERNANCE MANUAL

Molly Tuck	Revision 1 of policy shared with DGWG	August 28, 2024	1.1
Molly Tuck	Initial Version of Policy	August 7, 2024	1.0

SC ECIDS DATA GOVERNANCE MANUAL

Number: Title	Data Quality Policy		
Approved by		Approved Date	

POLICY STATEMENT

The South Carolina (SC) Early Childhood Advisory Council (ECAC), as the governing body of the South Carolina Early Childhood Integrated Data System (ECIDS), is committed to ensuring that data assets incorporated into SC ECIDS framework initiatives are of the highest quality available and to seeking continued improvements of data quality pertaining to young children’s early learning experiences. Such commitments to data quality afford South Carolinians confidence that decision makers using data from SC ECIDS initiatives have access to the best information with regard to young children and their families. To accomplish this, the SC ECAC acknowledges the need for the Data Governance Work Group (DGWG) to operate with unified definitions and procedures related to data quality assurance.

PURPOSE

The purpose of this policy is to establish the principles and processes by which the quality of SC ECIDS data is defined, assessed, and sustained over time. This policy also outlines the procedure for reporting and resolving data quality issues affecting SC ECIDS initiatives. This policy does not supersede a participating program’s quality definitions and only applies to data needed for integration in the SC ECIDS initiatives.

SCOPE

This policy applies to all data collected, processed, and stored as a part of SC ECIDS framework initiatives, including but not limited to personally identifiable information (PII), sensitive educational records, research data, and administrative data.

DEFINITIONS

- **Personally identifiable information (PII)** are details about individual(s) that either alone or when connected to other key details could identify a specific individual.
- **Sensitive educational records** include data or information that are collected and stored for educational purposes that individual(s) may not want to be shared with others or could contain information that may cause harm to the individual.
- **Research data** are pieces of information that are collected for the purposes of conducting research or answering a research question, which could include data that have been adjusted based on administrative data or primary data collected for the purposes of conducting research.
- **Administrative data** is information about individuals or program operations that are collected and maintained as a part of the functioning of a service or program.
- **External/authorized users** are individuals or entities granted access to ECIDS data for legitimate purposes, including researchers, policymakers, program administrators, and other stakeholders involved in early care and education.
- **Participating programs** are programs that regularly contribute data to SC ECIDS. Participating programs have data stewards, who are responsible for managing and maintaining data quality within their program.

ROLES AND RESPONSIBILITIES

- **Participating programs** are responsible for requiring relevant staff to be trained in data quality and providing accurate technical documentation.

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- The **DGWG** is responsible for establishing procedures, processes, and standards for operationalizing the SC ECIDS framework as well as establishing standard definitions.
- The **Data Governance (DG) Coordinator** is responsible for facilitating and managing decisions and recommendations of each DGWG, enabling decision-making, and aiding in issue resolution.

PROCESS

1. The DGWG will compile and review the data quality expectations from each of the participating programs, the Revenue and Fiscal Affairs (RFA) Office, and the South Carolina Department of Education (SCDE) to ensure that the SC ECIDS data quality policies align and do not go against each individual participating program's regulations and/or common data standards.
2. The DG Coordinator will organize DGWG conversations on standard definitions of data quality principles under which SC ECIDS will operate, including commitment to accuracy, completeness, consistency, and/or timeliness. Following these conversations, the DGWG will use the approval process outlined in the "Data Governance Related Decision-Making Policy" to reach consensus on definitions of data quality principles.
3. The DG Coordinator will organize DGWG conversations on unified quality assurance procedures, including but not limited to data collection, data linking and sharing, data validation, data cleaning, metadata, and common definitions of variables. Following these conversations, the DGWG will use the approval process outlined in the "Data Governance Related Decision-Making Policy" to reach consensus on the quality assurance procedures of the SC ECIDS.
4. After consensus has been reached, any member of the DGWG can request that the DG Coordinator add a data quality definition or quality assurance procedure to the agenda for review during the annual evaluation of data governance processes and procedures (see "Data Scope and Management Policy") to discuss necessary revisions or updates. Any proposed revision or update will follow the "Data Governance Related Decision-Making Policy" procedure.
5. The DGWG's data quality and quality assurance definitions, as well as any revisions of those definitions, will be shared with the ECAC using the Board of Trustees meeting report (see "Data Scope and Management Policy").

PROCEDURE FOR REPORTING AND RESOLVING DATA QUALITY ISSUES

1. If an external/authorized user or participating program identifies a data quality issue in the SC ECIDS data, they will immediately notify the DG Coordinator in writing.
2. The DG Coordinator will notify the Revenue and Fiscal Affairs Office (RFA) of the issue. If the issue is relevant to the Early Learning Extension (ELE) initiative, the Department of Education (SCDE) will also be notified.
3. If the data quality issue pertains to or is the result of a single data source in the Palmetto Drive to 5 (PDt5) initiative, the affected participating program will work with the DG Coordinator and RFA to address and remedy the issue in alignment with the DGWG's definitions of data quality. Issues and solutions will be communicated to the PDt5 DGWG by the DG Coordinator, as necessary.
4. If the data quality issue pertains to or is the result of a single data source in the ELE initiative, the affected participating program will work with the DG Coordinator, RFA, and SCDE to address and remedy the issue in alignment with the DGWG's definitions of data quality. Issues and solutions will be communicated to the ELE DGWG by the DG Coordinator, as necessary.

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5. If the data quality issue pertains to or is a result of the SC ECIDS framework, the DG Coordinator will request the formation of a Critical Data Issue project team (See “Establishment of Project Teams Policy”):
 - a. The Critical Data Issue Project Team will detail the current state of the issue.
 - b. The Critical Data Issue Project Team will identify the desired outcome of the solution that aligns with the standard data quality definitions and procedures.
 - c. The Critical Data Issue Project Team will develop a solution proposal.
 - d. The Critical Data Issue Project Team will share the solution proposal with the DGWG and seek feedback.
 - e. Once a consensus has been reached on the solution, the DG Coordinator will work with RFA, SCDE, and, if applicable, any affected participating programs to implement the agreed-upon solution.
 - f. The Critical Data Issue Project Team and DGWG will evaluate the effectiveness of the solution.
 - g. The Critical Data Issue Project Team will identify appropriate avenues for public notice of the critical data issues/solutions and lead the dissemination of these notices prior to disbandment.

RELATED POLICIES

- [Data Governance Related Decision-Making Policy](#)
- Data Scope and Management Policy
- [Establishment of Project Teams Policy](#)

REVISION HISTORY

Responsible Party	Reason for Change	Date	Version
Molly Tuck	Revision 1 of policy shared with DGWG	August 28, 2024	1.1
Molly Tuck	Initial version of policy	August 7, 2024	1.0

SC ECIDS DATA GOVERNANCE MANUAL

Number: Title	Data Scope and Management Policy		
Approved by		Approved Date	

POLICY STATEMENT

The South Carolina (SC) Early Childhood Advisory Council (ECAC), as the governing body of the South Carolina Early Childhood Integrated Data System (ECIDS), aims to integrate data on South Carolina’s young children, defined as before kindergarten entry, enrolled in early childhood programs, broadly defined beyond state and federally funded programs. The integrated data will provide decision makers the opportunity to understand the comprehensive experiences of young children before entry into elementary school, a critical window for a child’s development. To do so, the ECAC pledges to support active and regular management and maintenance of data assets and the procedures associated with doing so over time. The ECAC also commits to sustaining data management partnerships with other agencies and organizations that are integral to SC ECIDS’ success, which includes, but is not limited to: the South Carolina Revenue and Fiscal Affairs Office (RFA), the South Carolina Department of Education (SCDE), and the participating programs contributing data to SC ECIDS initiatives.

PURPOSE

The purpose of this policy is to document how data are collected, managed, and sustained within the initiatives of the SC ECIDS framework and how SC ECIDS data governance procedures are maintained over time. The policy further details the SC ECIDS procedure for handling data submission issues and support. This policy does not provide information on which entities own SC ECIDS data (see “Data Ownership Policy”) or the circumstances for when data can or cannot be used (see “Data Use Policy” and “Data Access and Acquisition Policy”).

SCOPE

This policy applies to all data collected, processed, and stored for the current initiatives of the SC ECIDS framework, including but not limited to personally identifiable information (PII), sensitive educational records, research data, and administrative data.

DEFINITIONS

- **Personally Identifiable Information (PII)** is any data that could potentially identify an individual, including names, addresses, social security numbers, or other identifying information.
- **Sensitive educational records** include data or information that are collected and stored for educational purposes that individual(s) may not want to be shared with others or could contain information that may cause harm to the individual.
- **Research data** are pieces of information that are collected for the purposes of conducting research or answering a research question, which could include data that have been adjusted based on administrative data or primary data collected for the purposes of conducting research.
- **Administrative data** is information about individuals or program operations that are collected and maintained as a part of the functioning of a service or program.
- **Core data elements** are the data elements outlined by the DGWG that participating programs have agreed to share with one another in the SC ECIDS.

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- **Data management** are the processes and procedures for collecting, storing, processing, and using data within the SC ECIDS, including data quality assurance, retention, and security measures.
- **Participating programs** are programs that regularly contribute data to SC ECIDS. Participating programs have data stewards, who are responsible for managing and maintaining data quality within their program.
- **External/authorized users** are individuals or entities granted access to ECIDS data for legitimate purposes, including researchers, policymakers, program administrators, and other stakeholders involved in early care and education.
- **Data sharing agreements (DSA)** are formal contracts or agreement between data owners and the SC ECIDS. This agreement outlines the terms and conditions under which data may be accessed, used, and disclosed, as well as the rights and responsibilities of each party with respect to the data.

ROLES AND RESPONSIBILITIES

- **Participating programs** are responsible for:
 - Ensuring high-quality data (see “Data Quality Policy”) are submitted to the ECIDS initiative(s) following any processes and procedures listed in the program’s own data scope and management policies, if applicable, and adhering to the timelines agreed upon in the Data Sharing Addendums (see “Data Use Policy”)
 - Maintaining an agreement with RFA for data sharing and integration into the State Data Warehouse
 - Collecting and sharing data elements as agreed upon by the DGWG
 - Adopting, communicating, and enforcing the established data governance policies, procedures, processes, and standards at all levels of their program.
- The **Data Governance Work Group (DGWG)** is responsible for:
 - Establishing procedures, processes, and standards for operationalizing the ECIDS framework, including but not limited to, effective data usage, sharing, access, security, and storage
 - Selecting data elements to be included in the SC ECIDS
 - Meeting regularly to operationalize the initiative under the ECIDS framework
 - Ensuring that their agency leaders and organizations are informed and brought into decision-making processes when appropriate.
- The **Data Governance (DG) Coordinator** is responsible for:
 - Coordinating statewide data governance efforts of early childhood data to ensure a system is built that protects young children and their families
 - Promoting the use of these data to inform decision-making and program improvement
 - Facilitating and managing decisions and recommendations of each DGWG, enabling discussion, and aiding in issue resolution.

PROCESS

1. Participating programs identify the applicable laws, regulations, and DSAs that dictate their own data collection and storage, in addition to any data use and management expectations.

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2. Because data is being stored with the technical leads of each SC ECIDS initiative, the technical lead's security policies are used to dictate data storage procedures, including safeguards to protect against unauthorized access, disclosure, or alteration.
3. The DGWG agrees upon the core data elements needed to integrate data in the SC ECIDS initiatives, and participating programs adhere to submitting the type of data required by SC ECIDS (the core data elements, as agreed upon by the DGWG, will be listed on the SC ECIDS Data Hub website).
4. If additional data elements are identified, the process for approving additional data elements follows the process for adding an indicator, as outlined in the "Data Use Policy" of the DG Manual.
5. The DGWG certifies that each participating program adheres to the established schedules for submitting data to RFA, per the program's DSA, to ensure high-quality, timely, and comparable SC ECIDS data.
6. The DG Coordinator maintains a list of all established schedules for data submission, as listed in each participating program's DSA with the technical lead, to send reminders of upcoming submission due dates to DGWG members of participating programs.
7. Formal changes to data sharing schedules, including realigning submission procedures to ensure data is comparable across different programs at certain time points, may be suggested by the DGWG, DG Coordinator, or ECAC staff and will require participating programs to sign-off on a Data Sharing Agreement (DSA) addendum.
8. Participating programs may collaborate with RFA, SCDE, and the DG Coordinator to identify additional data they wish to include in the SC ECIDS initiative to evaluate certain outcomes or obtain a specific result. The inclusion of additional data may require addendums to the participating program's MOA(s) and/or DSA(s).
9. If addendums need to be made to participating programs' MOAs or DSAs, DGWG members review all relevant addendums with their agency leaders, who make a decision on the addendum in a timely manner following the timeframes outlined by the DGWG.
10. The DGWG, led by the DG Coordinator, reviews the SC ECIDS Data Governance Manual's procedures and processes on an annual basis, during a regular meeting of the DGWG (as outlined in the "Data Governance Work Group Meetings Policy") to verify that these workflows continue to reflect best practices of data governance and management.
11. Any changes to DG processes or procedures will be communicated with the ECAC using the Board of Trustees Meeting report template and, if applicable, communicated with participating programs and external/authorized users through the ECIDS Data Hub website.
12. If applicable, members of the DGWG ensure their organization or agency's data scope and management procedures are reviewed on a regular basis, as set forth by the participating program's policies.

DATA SUBMISSION SUPPORT PROCEDURE

1. Programs submit data to the technical lead(s) of the SC ECIDS initiative following the terms outlined in the DSA.
2. If data submission and sharing issues arise that would impact the caliber or timeliness of the data being shared by a participating program in an initiative of the SC ECIDS framework, the DGWG data steward(s) must promptly notify the DG Coordinator and the technical lead(s) of the ECIDS initiative of the issue in writing.

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3. The affected participating program(s), the DG Coordinator, the technical lead(s) of the SC ECIDS initiative, and other applicable members of the DGWG collaborate to address the issue and find a solution.
4. The DG Coordinator provides updates to the DGWG of ongoing issues and recently implemented solutions at DGWG meetings, if appropriate.

RELATED POLICIES

- [Data Ownership Policy](#)
- Data Quality Policy
- Data Use Policy
- Data Access and Acquisition Policy
- [Data Governance Work Group Meetings Policy](#)

REVISION HISTORY

Responsible Party	Reason for Change	Date	Version
Molly Tuck	Revision 1 of policy shared with DGWG	August 28, 2024	1.1
Molly Tuck	Initial version of policy	August 7, 2024	1.0

SC ECIDS DATA GOVERNANCE MANUAL

Number: Title	Data Access and Acquisition Policy		
Approved by		Approved Date	

POLICY STATEMENT

The South Carolina (SC) Early Childhood Advisory Council (ECAC), as the governing body of the South Carolina Early Childhood Integrated Data System (ECIDS), seeks to understand the experiences of young children and their families and wants to bring together the necessary information across data sources in South Carolina to do so. The ECAC welcomes policymakers and researchers to utilize SC ECIDS when making decisions regarding young children and their families. Therefore, the ECAC will ensure that appropriate, ethical, and timely access and acquisition of data occurs under the SC ECIDS framework.

PURPOSE

The purpose of this policy is to explain the process and procedures by which record-level and aggregated data are requested, accessed, and acquired to be shared from participating programs with the SC ECIDS and subsequently how SC ECIDS data may be accessed or acquired by external/authorized entities when approved. This policy does not outline processes or guidelines for analyzing and reporting data (see “Data Analysis and Reporting Policy”), nor does it detail data destruction procedures (see “Data Destruction Policy”). This policy also does not refer to data use by ECAC in standard reports and dashboards for the SC ECIDS Data Hub (see “Data Use Policy”).

SCOPE

This policy applies to all data collected, processed, and stored within the SC ECIDS initiatives, including but not limited to personally identifiable information (PII), sensitive educational records, research data, and administrative data.

DEFINITIONS

- **Personally Identifiable Information (PII)** is any data that could potentially identify an individual, including names, addresses, social security numbers, or other identifying information.
- **Sensitive educational records** include data or information that are collected and stored for educational purposes that individual(s) may not want to be shared with others or could contain information that may cause harm to the individual.
- **Research data** are pieces of information that are collected for the purposes of conducting research or answering a research question, which could include data that have been adjusted based on administrative data or primary data collected for the purposes of conducting research.
- **Administrative data** is information about individuals or program operations that are collected and maintained as a part of the functioning of a service or program.
- **Participating programs** are programs that regularly contribute data to SC ECIDS.
- **External/authorized users** are individuals or entities who have completed requests for data and have been granted access to ECIDS data for legitimate purposes, including researchers, policymakers, program administrators, and other stakeholders involved in early care and education. Based on the data request, external/authorized users may be classified as Record-Level Data Requestors and/or Aggregate Data Requestors.

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- **Data sharing agreements (DSA)** are formal contracts or agreement between data owners and the technical lead(s) for the relevant SC ECIDS initiative(s). This agreement outlines the terms and conditions under which data may be accessed, used, and disclosed, as well as the rights and responsibilities of each party with respect to the data.

ROLES AND RESPONSIBILITIES

- Participating programs maintain data ownership and are responsible for reviewing and providing approval for data requests that include data specific to their program in a timely manner.
- External/authorized users are responsible for abiding by SC ECIDS data access and acquisition policies. These users are also responsible for abiding by all policies in the SC ECIDS Data Governance Manual pertaining to data use and access.
- DGWG is responsible for outlining, monitoring, and maintaining data access and acquisition guidelines for SC ECIDS data.
- The Data Governance (DG) Coordinator is responsible for facilitating and managing decisions and recommendations of each DGWG, enabling decision-making, and aiding in issue resolution.

PROCESS

1. DGWG Process to Determine Guidelines for Data Access

- a. Participating programs set their own data access and acquisition guidelines.
- b. The SC Department of Education (SCDE) and the SC Revenue and Fiscal Affairs Office (RFA) develop data sharing agreements, which are signed by all participating programs.
- c. The DGWG ensures expectations across participating programs, SCDE, RFA and the SC ECIDS Data Governance Framework are aligned to determine a final set of expectations for SC ECIDS data access and acquisition.
- d. The technical leads of each initiative and data stewards of each program determine if there are other federal, state, or local regulations regarding data access and acquisition (e.g., FERPA or HIPAA).
- e. The DG Coordinator develops and monitors a centralized data request application, which is hosted on the SC ECIDS Data Hub website and approved by the DGWG.
- f. The DG Coordinator ensures data access and acquisition guidelines are communicated with external/authorized users of SC ECIDS data by coordinating the inclusion and updating of these guidelines on the ECAC Data Hub website, where the data request application is located.
- g. The DG Coordinator coordinates reviews of current data requests at DGWG meetings (as outlined in Appendix A: SC ECIDS Data Request & Review Process) and communicates the overall outcomes of these reviews with the ECAC through the Board of Trustees Meeting Report.
- h. The DGWG, supported by the DG Coordinator, periodically reviews the data access and acquisition guidelines to identify issues. As outlined in the Data Scope and Management Policy, all changes will be communicated to the ECAC by the DG Coordinator in the Board of Trustees Meeting Report.
- i. The DGWG, by proxy of a Data Access and Acquisition Issue Project Team, develops processes by which data access and acquisition issues are addressed, escalated, and resolved.

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2. Data Access and Acquisition Guidelines and Processes

- a. Data request processes are outlined in Appendix A: SC ECIDS Data Request & Review Process.
- b. The DGWG and technical leads of SC ECIDS initiatives identify which variables can be included in the Available Variable List document of the data request application, based on program guidelines and whether any program has variables that are restricted or otherwise unavailable to the public.
- c. The technical leads, supported by the DG Coordinator, develop the Confidentiality Agreement document and the Table Shell document of the data request application. Any additional security and/or data sharing documentation required during the application process will also be developed by the technical leads.
- d. Upon approval of a data request application, the relevant technical lead(s) of the SC ECIDS initiative will work with the data requestor to get any additional documentation completed and will fulfill the data request (see “Appendix A: SC ECIDS Data Request and Review Process”).
- e. The DGWG, supported by the DG Coordinator, periodically reviews the data access and acquisition application and process to identify necessary changes. As outlined in the Data Scope and Management Policy, all changes will be communicated to the ECAC by the DG Coordinator in the Board of Trustees Meeting Report.

3. Procedure for Reporting and Resolving Data Access and Acquisition Issues

- a. If an external/authorized user or participating program identifies a data access and acquisition issue in the SC ECIDS framework, they will immediately notify the DG Coordinator in writing. Data access and acquisition issues do not include data breaches. This is covered in the Data Privacy and Confidentiality Policy.
- b. The DG Coordinator will notify the relevant technical leads and, if applicable, affected participating programs of the issue. The DG Coordinator, technical leads, and/or DGWG members of the affected participating programs may also coordinate with the external/authorized user, if applicable, to address the issue.
- c. Any DGWG member may request the formation of a Data Access and Acquisition Issue project team (See “Establishment of Project Teams Policy”):
 - i. The Data Access and Acquisition Issue Project Team will detail the current state of the issue.
 - ii. The Data Access and Acquisition Issue Project Team will identify the desired outcome of the solution that aligns with the RFA, SCDE, participating programs, and SC ECIDS guidelines.
 - iii. The Data Access and Acquisition Issue Project Team will develop a solution proposal.
 - iv. The Data Access and Acquisition Issue Project Team will share the solution proposal with the DGWG and seek feedback.
 - v. Once a consensus has been reached on the solution, the DG Coordinator will work with RFA, SCDE, and, if applicable, any affected participating programs to implement the agreed-upon solution.
 - vi. The Data Access and Acquisition Issue and DGWG will evaluate the effectiveness of the solution before disbandment of the project team.

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- vii. Any changes to the process or procedures, as a result of the solution, will be communicated to the ECAC in the Board of Trustees Meeting Report.
- viii. The DG Coordinator will document all ongoing issues for consideration during the annual review of DGWG processes and procedures.

ATTACHMENTS

- Appendix A: SC ECIDS Data Request & Review Process
- [Record-Level Data Request Application](#)
- [Aggregate Data Request Application](#)

RELATED POLICIES

- Data Analysis and Reporting Policy
- Data Destruction Policy
- Data Privacy and Confidentiality Policy
- Data Scope and Management Policy
- [Establishment of Project Teams Policy](#)

REVISION HISTORY

Responsible Party	Reason for Change	Date	Version
Molly Tuck	Revision of policy shared with DGWG	September 25, 2024	1.1
Molly Tuck	Initial version of policy	September 4, 2024	1.0

Appendix A: SC ECIDS Data Request & Review Process

Definitions

CEDS = Common Education Data Standards

DG = Data governance

DGWWG = Data governance work group

EC = Early childhood

SCDE = South Carolina Department of Education

SC ECIDS = South Carolina Early Childhood Integrated Data System

SLDS = Statewide Longitudinal Data System

RFA = Office of Revenue and Fiscal Affairs

ORDA = Office of Research and Data Analysis at the Department of Education

Purpose

For the SC ECIDS, all requests for early childhood data, be it a piece of data or a more complex request for one or multiple research questions, must follow the defined processes below. The processes outlined below do not supersede internal data request processes at agencies and/or programs participating in the SC ECIDS. These data request and review processes cover the two current SC ECIDS initiatives.

The Early Learning Extension (ELE) Data Governance Work Group and the Palmetto Drive to Five (PDt5) Data Governance Work Group will be responsible for reviewing data (or research) requests focused on early learning data from two or more participating programs.

If data requests are received that only include data from one participating program, the application system will automatically return a message directing the requestor to the appropriate program's website, which will follow the participating program's request process. Therefore, the DG Coordinator and DGWWG are not involved in the process.

Record-level Data Requests

1. The requestor submits a data inquiry form on the ECAC Data Hub website and indicates a record-level request.
2. Upon submission, the requestor receives an automated confirmation email with an assigned request number and links to the SC ECIDS Record-Level Data Request Application, Available Variable List, and Confidentiality Document. The Available Variable List and the Confidentiality Document must be completed and attached to the application.
 - a. As indicated in the application, all external/authorized users requesting record-level data for research purposes are required to go through an Institutional Review Board (IRB) affiliated with their institution that is responsible for human research ethics and submit their IRB status as part of the data request. The data request application requires submission of IRB approval. Requests can indicate that IRB approval is pending, but the requestor will have to submit proof of IRB approval before they can sign a data sharing agreement and access the data.
3. Once the requestor has submitted the application, an automated workflow alerts DG Coordinator, who checks the application for completeness and the requested variable list to ensure it does not include any variables that participating programs have already indicated are restricted/will not be released to the public (if applicable).
 - a. If the application is incomplete, the workflow sends the requestor a link to edit and/or finish the application.

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- b. If the application requests restricted variables, the requestor receives an email saying the request was denied. If the request is denied and the requestor wishes to submit a new request for SC ECIDS data, they are encouraged to review the list of restricted variables (as outlined on the SC ECIDS Data Hub website) prior to submitting the new application.
4. Once the application is complete and the request does not include restricted variables, the workflow sends the application to the DGWG members listed in the MOAs of the applicable EC programs included in the request and the technical lead(s) of the requested ECIDS initiative (SCDE and/or RFA). The workflow also assigns the application a review date:
 - a. If the application is completed more than two weeks prior to the next DGWG meeting, the assigned review date will be the upcoming meeting.
 - b. If the application is completed less than two weeks prior to the next DGWG meeting, the assigned review date will be the meeting following the upcoming meeting, to ensure applicable EC programs have time to review the request package.
5. The DG Coordinator reminds applicable EC programs of the request one week prior to the assigned review date to ensure representatives will be at the meeting to discuss the request. At least one representative from applicable EC programs should attend the meeting to discuss the request.
 - a. If no representatives can attend the meeting, due to extenuating circumstances, the program must notify the DG Coordinator prior to the meeting, and the DG Coordinator changes the assigned review date to the following meeting. If a program needs to change the assigned review date more than once for an application, the program's DGWG members should work with the DG Coordinator to develop an appropriate and reasonable review timeline, which will be made available to the applicant upon request.
6. The DG Coordinator provides all DGWG members with summaries of each request that will be discussed during the meeting as an appendix to the meeting agenda.
7. On the assigned review date during the DGWG meeting:
 - a. Applicable DGWG members review SC ECIDS Data Request Application and may discuss any concerns or questions.
 - b. Other DGWG members may add to discussion, as appropriate.
 - c. Each applicable EC program receives a decision form to approve, deny, or request more information from the requestor after the meeting. To ensure a timely response to research requests, each applicable EC program should submit this form within four weeks of the DGWG meeting, but DGWG members can request a formal extension from the DG Coordinator, if necessary, and the program's DGWG members will work with the DG Coordinator to develop an appropriate and reasonable review timeline, which will be made available to the applicant upon request. The workflow will send email reminders to DGWG members of outstanding decision forms every two weeks.
8. Based on the applicable EC programs' form responses, the requestor receives one of the following:
 - a. If all applicable EC programs approve the request:
 - i. The requestor receives an email of tentative approval.
 - ii. The workflow sends the technical lead(s) an approval alert, and the technical leads of the associated SC ECIDS initiative work with the requestor to complete the required security and data use agreement documents necessary to access the data.
 - iii. The technical lead(s) of the associated SC initiative compile the requested Data Package.

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- iv. Prior to sending the Data Package to the requestor, the technical leads will first send the Data Package to the applicable programs for review. The applicable programs must review and respond within two weeks otherwise the workflow will default to an approval.
- b. If at least one applicable EC program denies the request, the requestor receives an email saying the request was denied.
 - i. The reasons for application denial are compiled together from the decision form in a feedback document that is sent to the requestor.
 - ii. If the request is denied and the requestor wishes to submit a new request for SC ECIDS data, they may contact the DG Coordinator to discuss the feedback document prior to submitting the new application.
- c. If at least one applicable EC program has follow-up questions or negotiations:
 - i. The questions and negotiations are compiled together from the decision form into a feedback document that is sent to the requestor.
 - ii. The workflow sends an email to the requestor with their previously submitted application and the feedback document.
 - iii. The requestor gains access to edit their request package and the process moves back to Step 3.

Aggregate Data Requests

1. The requestor submits a data inquiry form on the ECAC Data Hub website and indicates an aggregate request.
2. Upon submission, requestor receives an automated confirmation email with assigned request number and links to the SC ECIDS Aggregate Data Request Application, Available Variable List, Table Shell, and Confidentiality Document. The Available Variable List, Table Shell, and the Confidentiality Document must be completed and attached to the application.
9. Once the requestor submits the application, an automated workflow alerts DG Coordinator, who checks the application for completeness and the requested variable list to ensure it does not include any variables that participating programs have already indicated are restricted/will not be released to the public (if applicable).
 - a. If the application is incomplete, the workflow sends the requestor a link to edit and/or finish the application.
 - b. If the application requests restricted variables, the requestor receives an email saying the request was denied. If the request is denied and the requestor wishes to submit a new request for SC ECIDS data, they are encouraged to review the list of restricted variables (as outlined on the SC ECIDS Data Hub website) prior to submitting the new application.
3. Once the application is complete and the request does not include restricted variables, the workflow sends the application package to the DGWG members listed in the MOAs of the applicable EC programs included in the request and the technical lead(s) of the requested ECIDS initiative (SCDE and/or RFA).
4. Within the workflow, applicable EC programs can approve, deny, or request more information from the requestor. To ensure a timely response to research requests, each applicable EC program should aim to submit this form within two months of being emailed the application package. The workflow will send bi-weekly reminders of outstanding requests to any applicable program that has not submitted a response.
5. The requestor receives one of the following:
 - a. If all applicable EC programs approve the request:
 - i. The requestor receives an email of tentative approval.

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- ii. The workflow sends the technical lead(s) an approval alert, and the technical leads of the associated SC ECIDS initiative work with the requestor to complete any required security and data use agreement documents necessary to access the data.
 - iii. The technical lead(s) of the associated SC initiative compile the requested Data Package.
 - b. If at least one applicable EC program denies the request, the requestor receives an email saying the request was denied.
 - i. The reasons for application denial are compiled together from the decision form in a feedback document that is sent to the requestor.
 - ii. If the request is denied and the requestor wishes to submit a new request for SC ECIDS data, they may contact the DG Coordinator to discuss the feedback document prior to submitting the new application.
 - c. If at least one applicable EC program has follow-up questions or negotiations:
 - i. The questions and negotiations are compiled together from the decision form into a feedback document that is sent to the requestor.
 - ii. The workflow sends an email to the requestor with their previously submitted application and the feedback document.
 - iii. The requestor gains access to edit their request package and the process moves back to Step 3.
6. DG Coordinator will continually report on aggregate data requests at DGWG meetings for consideration of adding to relevant reports or dashboards.

Data Requests for the Early Learning Extension of the K-12 Statewide Longitudinal Data System Requested directly from SCDE

1. Requestor completes the GovQA form via SCDE.
2. SCDE ORDA Team forwards GovQA request to DG Coordinator.
3. The DG Coordinator submits initial inquiry form to generate an assigned request number, which begins the outlined process at Step 2 for either record-level or aggregate data, based on request.

SC ECIDS Data Request Review Team

Role of the EC Programs from Whom Data is Being Requested

Each participating program retains ownership over their data is the ultimate decision-maker around how their data is used. For each request, applicable EC programs are sent the request package immediately for their consideration before it is reviewed by the DGWG at-large. EC Programs are expected to respond to research requests in a timely manner, as outlined by the SC ECIDS Data Governance Charter.

Role of the Initiative's Data Governance Work Group

Data Governance Work Groups (DGWG) operationalize SC ECIDS initiatives. DGWG members serve as the *Data Request Review Team* for each corresponding initiative. The role of the DGWG is to review and make a collective decision on data requests, including but not limited to external data requests related to early childhood data for all initiatives and internal data requests from SC Department of Education for the Early Learning Extension Initiative of the SC ECIDS. The DGWG will be responsible for making decisions and determining, with confidence, whether the data (or research) request is sound, feasible, and supports the early childhood landscape in South Carolina. The work of the DGWG does not

SC ECIDS DATA GOVERNANCE MANUAL

supersede any data access and acquisition policies of the participating programs from whom the data is being requested.



**Interagency Collaboration Committee
Meeting Recap
September 17, 2024**

Present: Amber Gillum, Department of Social Services; Leesa Aiken, SC State Library; Eric Bellamy, Children's Trust; Jennifer Buster, Department of Health and Human Services; Mary Lynne Diggs, Head Start Collaboration Office Anita Ellison-Porter, Department of Mental Health; Jennifer Jaques, Department of Disabilities and Special Needs; Berry Kelly, Department of Health and Environmental Control; Georgia Mjartan, SC First Steps/ECAC

Absent: Mark Barnes, SC First Steps; Solandra Bowman, SC Educational Television; Matthew Ferguson, Department of Education; Constance Holloway, Department of Disabilities and Special Needs; Louise Johnson, Department of Mental Health

ECAC Staff: Laura Baker, Alissa Durham, Rachal Hatton-Moore, Karen Oliver, Chelsea Richard, Molly Tuck

WELCOME

ICC Chair, Amber Gillum, convened the meeting at SC Department of Disabilities and Special Needs.

Listen4Good Update

The ICC will not pursue a project with Listen4Good at this time. Many partners already are collecting feedback from a range of stakeholders, including contract and internal staff.

Preview of Early Childhood Integrated Data System (ECIDS) Data Hub/Dashboard

Molly Tuck, Strategic Data Fellow, shared a preview of the ECIDS Data Hub. ICC partners offered feedback, which will be adopted. The hub should be launched in the first quarter of calendar year 2025.

Review of Data for the Birth through Five Plan

Karen Oliver reminded meeting participants that a survey had been circulated to confirm, collectively, that the SC For Our Future Birth Through Five Plan information includes data points that reflect child, family, system needs. The following criteria were generally agreed upon for inclusion of quantitative data published in the Birth through Five Plan

- Data are publicly available
- Data are updated at least every other year
- Data are available at least at the state level - bonus points if available for every county
- Data can be disaggregated by key demographics (i.e., age, race, ethnicity, poverty level)
- Agency or agencies who are in the domain agree that it is a trusted source
- Data have some benchmark available (national prevalence or national goal)

A survey was circulated with each of the data elements in the Birth through Five Plan. Respondents approved the data types and sources. Three items were identified as needing updates, new metrics, or sources for data. They were: 1) unsafe sleep; 2) percent of undergraduates who are parents; 3)

cost of child care. Chelsea Richard will follow up with first two measures, and Amber Gillum will follow up regarding cost of child care.

Review and Discussion about B5 Plan 2024 Priorities

ICC members identified activities that addressed B5 Plan 2024 priorities.

- **Increase participation in publicly funded preschool programs.**
This priority continues from 2023 and it appears that PreK enrollments are increasing.
- **Collect, integrate, and share data to better understand who is served, where service gaps exist, and where to target resources and services.**
Two data workgroups are engaged in this work, and it anticipated that the data hub will be launched in early 2025.
- **Expand support to help families access the services and supports they need**
Healthy Steps has continued through a collaboration between DPH and DSS. More services are being added to the First Five common application, such that it is easier for families to learn about and apply for services.
- **Expand access to screening, identification of disabilities and referrals for treatment and Services**
DSS has contracts to offer Help Me Grow across the state. DPH is developing a statewide screening registry RFP.
- **Promote and support personal and social skill-building**
BabyNet is offering reflective supervision and endorsement in infant and early childhood mental health. Teams continue to offer training to child care providers in the pyramid model. Suspension and expulsion continue to be of interest to a range of parents, providers policy leaders.

ICC UPDATES AND OPPORTUNITIES

- Amber Gillum shared information about the OPT IN Project, an effort to transform child welfare.
- Leesa Aiken discussed opportunities for ICC partners to work more closely with county libraries.
 - Karen Oliver will convene Amber Gillum, Eric Bellamy and Leesa Aiken to see how a range of projects might benefit from more direct engagement by libraries.
- Laura Baker offered to provide training and First Five resources to local library staff.

The meeting adjourned at 11:05 AM.



Report on Early Childhood Advisory Council Activities October 2024

Research, Strategy, and Data Governance

The Interagency Collaboration Committee members reviewed the data elements and their sources in the Birth through Five Plan. The sources were reviewed against the following criteria:

- Data are publicly available
- Data are updated at least every other year
- Data are available at least at the state level - bonus points if available for every county
- Data can be disaggregated by key demographics (i.e., age, race, ethnicity, poverty level)
- Agency or agencies who are in the domain agree that it is a trusted source
- Data have some benchmark available (national prevalence or national goal)

Three items were identified as needing updates, new metrics, or sources for data. They were: 1) unsafe sleep; 2) percent of undergraduates who are parents; 3) cost of child care. ICC members and ECAC staff are following up with new options or information.

Family-Centered Practice

A suite of items relating to family voice and two-generation (two-gen) practice are slated for release before the end of the year. A second Year of Family Voice Report is in production. The SC Summit on Early Childhood will feature a panel discussing two-gen issues and will showcase videos that describe the two-gen approach. These videos also will be released through social media channels.

The Family Voice Council is recruiting new members. Please contact Rachal-Hatton-Moore, at rhatton@scfirststeps.org for more information or to share contacts of parents/caregivers who have an interest to serve.

Streamlined Access to Services

Palmetto Pre-K (www.PalmettoPrek.org)

Palmetto PreK website:

July 1- September 30, 2024

Unique website visitors: 4,134

Total Leads: 845

- Head Start eligible: 323
- Public School eligible: 233
- First Steps 4K eligible: 224
- SC DSS Working Families Child Care Scholarship eligible: 129

First Five SC (www.first5sc.org)

First Five SC Website:

July 1, 2024 – September 30, 2024

- Unique website visitors: 8732
- Families that completed screener: 1073
- Families eligible for at least one program: 874
- All program leads: 1437

First Five SC Applications:

July 1, 2024 – September 30, 2024

Total Applications Received: 262

By program:

- First Steps Local Partnerships: 134
- SC Child Care Scholarships: 84
- WIC: 20
- First Steps 4K: 24

A First Five Stakeholder Engagement Report is slated for release in December. This report will outline the themes received from a series of listening sessions and will inform future enhancements that better serve families using the First Five SC portal.

Field Building and Professional Development

During the last two years First Steps/ECAC received grant funding to share information and lessons learned about portal building. Pritzker Children’s Initiative and the David and Lucile Packard Foundation support ECAC staff to build out First Five for All, an initiative to generate coordinated eligibility and enrollment portals, like Palmetto PreK and First Five SC, in other states and large municipalities. To that end, First Five staff recently served on panels in two national webinars

- The Children’s Interagency Coordinating Council, “Improving Benefit Access and Utilization for Children and Their Families Experiencing Poverty”
- Voices for Healthy Kids/National Collaborative for Infants and Toddlers, “Making it Easier for Parents to Access Programs & Services for Infants & Toddlers. Spreading the First Five for All Model”

Two-gen Systems Manager, Rachal-Hatton Moore, is working with a coalition of states to produce a gap and landscape analysis of state-level family voice councils associated with Early Childhood Advisory Councils.

The SC Summit on Early Childhood, “Where We Begin,” is scheduled for Thursday, December 5. All ECAC partner agencies have pledged sponsorships. Sponsor support provides parents, advocates and early childhood professionals access to affordable continuing education and professional content. This year’s keynote speakers are John Simpkins and Dr. Dana Suskind.