

SOUTH CAROLINA EARLY CHILDHOOD INTEGRATED DATA SYSTEM
DATA GOVERNANCE MANUAL

Number: Title	####: Data Ownership		
Approved by	Early Childhood Advisory Council	Approved Date	June 20, 2024

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), acknowledges that programs retain ownership of their data that is shared for any ECIDS initiative and always decide the rules for the use of and access to their data.

PURPOSE

The purpose of the policy is to document which entities maintain ownership of which SC ECIDS data at any given time. This policy does not outline who approves of SC ECIDS data use (see “Data Use Policy”).

SCOPE

This policy covers current and future initiatives of the SC ECIDS.

ROLES AND RESPONSIBILITIES

- **Participating programs** (programs defined as participating, as described in the “Program Participating Policy”): Per the Data Governance Charter, participating programs are responsible for:
 - Ensuring the accuracy, integrity, and security of their data.
 - Establishing and enforcing access controls to protect sensitive and confidential information from unauthorized or unintentional access, use, or disclosure.
 - Adhering to all relevant regulations governing the collection, storage, use, retention, and destruction of data (e.g., FERPA, the HIPAA Privacy Rule, the IDEA Parts B and C confidentiality regulations, and the Head Start confidentiality regulations).
 - Assessing the quality of data elements and identify which data elements are appropriate for sharing with the SC ECIDS.
 - Maintaining the appropriate agreements for program participation, which are initiative(s) dependent.
 - Collaborating with SC ECIDS to resolve or inform on data issues.
 - Abiding the privacy requests of individuals whose data is collected by the program.
- **Data Governance Work Group (DGWG)**: Per the Data Governance Charter, the “DGWG will operationalize the ECIDS and develop recommendations to the ECAC for their consideration to support South Carolina’s early childhood system in being aligned, coordinated, and family centered. Each DGWG promotes data quality, availability, data usage, privacy, and security.” Specific to data ownership, the DGWG is responsible for:
 - Establishing procedures, processes, and standards for operationalizing the ECIDS, including but not limited to, effective data usage, sharing, access, security, storage, retention, and destruction; future data integration; changes to standard reports; changes to data collection.
 - Selecting data elements to be included in the ECIDS.
 - Establishing standard definitions and reports.
 - Defining metadata and data quality standards.
 - Supporting data literacy and maximizing appropriate data use, including supporting data and research request processes.

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- **External user:** Data users are not affiliated with a participating program and do not have access to the ECIDS, including but not limited to external researchers or evaluation staff. Before receiving access to the data, each external user must apply for access to data and, if granted, sign a user agreement to abide by policies and regulations covering the use, security, confidentiality, and destruction of data. See “Data Access and Acquisition Policy”.

PROCESS

During data collection

- Participating programs are responsible for adhering to all relevant regulations governing the collection, storage, use, retention, and destruction of data (e.g., FERPA, the HIPAA Privacy Rule, the IDEA Parts B and C confidentiality regulations, and the Head Start confidentiality regulations).
- Participating programs are responsible for recognizing and respecting the privacy rights and interests of individuals whose data is collected and stored with the program. This includes protecting individuals’ rights to not have their data collected.
- Participating programs are responsible for obtaining program participant consent for data sharing with state agencies for program evaluation purposes.

Prior to sharing data with ECIDS. See “Program Participation Policy”.

After sharing data with ECIDS

- Participating programs retain ownership of their data and will ultimately decide the rules for the use of and access to their data.
- Participating programs collaborate with the Data Governance Coordinator and relevant parties, i.e., staff at the South Carolina Department of Education and the Revenue and Fiscal Affairs Office, to address data issues (see “Data Quality Policy”).
- As part of their participation on the Data Governance Work Group, participating programs participate in standard, routine report (static and dynamic) development, and their explicit approval is required before data are published publicly (see “Data Analysis and Reporting Policy”). Participating programs should utilize their own internal approval processes as they see fit to inform their approval.
- External users will apply using a formal application process to gain access to SC ECIDS data, and participating programs will have to give explicit permission in response to each application for their data to be shared (see “Data Access and Acquisition Policy”). Participating programs should utilize their own internal approval processes as they see fit to inform their approval.
- Participating programs review the agreements with the South Carolina Department of Education and the Revenue and Fiscal Affairs Office annually to identify any changes in regulations and/or data to be shared with the ECIDS. Only data elements listed in these agreements may be shared; additional sharing will require an agreement addendum before sharing.

REVISION HISTORY

Responsible Party	Reason for Change	Date	Version
Chelsea Richard	Revision 1 of policy shared with DGWG	May 1, 2024	1.1
Chelsea Richard	Initial version of data ownership policy	March 29, 2024	1.0