

SC ECIDS DATA GOVERNANCE MANUAL

Number: Title	Data Scope and Management Policy		
Approved by	Early Childhood Advisory Council	Approved Date	10/17/2024

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), 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