

## **Privacy Policy and Consent to Use of Data**

IMPORTANT: BY RECEIVING SERVICES FROM HELP ME GROW SOUTH CAROLINA ("HMG SC"), INCLUDING USING HMG SC'S ONLINE SCREENING PORTAL TO ACCESS THE AGES AND STAGES QUESTIONNAIRES ("ASQ"), YOU GIVE YOUR CONSENT THAT ALL PERSONAL DATA THAT YOU REPORT MAY BE PROCESSED IN THE MANNER AND FOR THE PURPOSES DESCRIBED IN THE FOLLOWING PRIVACY POLICY:

# **Privacy Policy**

This Privacy Policy describes HMG SC current policies and practices with regard to Personal Data collected by HMG SC. The term "Personal Data" refers to personally identifiable information about you and your child such as your name, birth date, telephone number, e-mail address, mailing address, developmental screening results, health concerns, and referrals. This Privacy Policy applies to information we collect through interactions with you via phone, email, and text exchange; information you provide when participating in developmental screening with the ASQ using HMG SC's online screening portal; and information provided to HMG SC by service providers to whom we refer you.

## **Notification of Changes to this Policy**

Because of changes in the law and the changing nature of technology, our data practices will change from time to time. If and when our data practices change, we will (as soon as practicable) post the changes on our website to notify you. We encourage you to check this page frequently.

#### Collection and Use of Personal Data

HMG SC will collect and store your information to connect you with the best possible services in the community to meet the needs of you and your child. In addition, we may use your Personal Data:

- In combination with the Personal Data of other HMG SC clients to research, evaluate, and improve our services.
- In combination with the Personal Data of others in South Carolina whose data is deposited in the South Carolina Integrated Data System housed at the South Carolina Revenue and Fiscal Affairs Office to:
  - o Improve early childhood programs and policy in South Carolina.
  - Research and evaluate the effectiveness of early intervention outcomes for participating children and families.
  - Identify characteristics of programs associated with positive outcomes for children and families.
- To provide you with important communications, such as changes to this Privacy Policy.

# **Storage of your Personal Data**

HMG SC stores your data in two locations:

1) The System for Tracking Access to Referrals ("STAR") is HMG SC's database for collecting and storing Personal Data used to identify appropriate services, provide service referrals to families and children,

- and ensure connection to services as a result of referrals made. STAR is a custom application designed solely for the use of Help Me Grow systems nationwide.
- 2) The South Carolina Integrated Data System housed at the South Carolina Revenue and Fiscal Affairs Office ("RFA") is the central setting for data storage by a wide array of state and private agencies and organizations, including but not limited to the Department of Social Services, the Department of Health and Environmental Control, the Department of Education, and South Carolina First Steps.

## **Disclosure of your Personal Data**

We do not share, sell, or distribute your Personal Data with unrelated third parties, except under these limited circumstances.

HMG SC stores its data in the South Carolina Integrated Data System housed at RFA. Third party researchers and evaluators may request to review and/or link HMG SC's data with other data housed at RFA. HMG SC reviews and approve all requests for data review and release. No personal identifiers such as your name, birth date, telephone number, e-mail address, or mailing address are shared with third party researchers and evaluators.

## Data integrity and security

STAR was developed by Data Silo Solutions (formerly KJMB Solutions) and is hosted in HIPAA cloud-based web and database servers. Data Silo Solutions follows industry standard practices and protocols for privacy and data protection as set forth in their HIPAA compliance statement document in the areas of Technical Safeguards, Physical Safeguards, and Administrative Safeguards to protect the data.

HMG SC employees who have access to Personal Data within STAR have been trained to handle such data properly and in accordance with security protocols and strict standards of confidentiality. Although we cannot guarantee against any loss, misuse, unauthorized disclosure, alteration or destruction of data, we are diligent in our efforts to prevent such occurrences.

RFA follows industry standards for privacy and data protection and is compliant with SCDIS-200 information security and privacy standards set forth by the Department of Administration's Division of Information Security. The Enterprise Privacy Office of the Department of Administration has been involved with RFA to ensure proper safeguards of citizen privacy.

Your Personal Data stored at RFA are protected by the Family Educational Rights and Privacy Act (FERPA), a federal law that protects the privacy of student education records; the Health Insurance Portability and Accountability Act (HIPAA) as amended by the Health Information Technology for Economic and Clinical Health (HITECH); and other state and federal laws.