

SC ECIDS DATA GOVERNANCE MANUAL

Number: Title	Data Access and Acquisition 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), 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

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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.

- **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.

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- 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.

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.

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- 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.
- 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

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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).

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- 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.
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.

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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 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.
 - 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).

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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.
 - 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.

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