



NMCAA Early Childhood Programs Annual Notice and Procedures to Protect PII

Annual Notice

Each year, NMCAA Early Childhood Programs provide families with information about your rights related to the protection of personally identifiable information (PII). This includes what information may be shared, who it may be shared with, and why it may be shared when parent consent is not required. These practices follow federal and state requirements designed to protect your child's privacy while allowing programs to operate effectively.

To better serve children and families, Northwest Michigan Community Action Agency (NMCAA) may share information across its programs on a need-to-know basis. This helps us coordinate services, make referrals, and ensure families receive the support they need without delays or duplication.

NMCAA is also required to share certain information with the State of Michigan for reporting, program administration, and service coordination. This helps ensure programs are operating effectively and that families can access available benefits and services.

We take your privacy seriously. All information is handled securely and in accordance with confidentiality and privacy laws. NMCAA Early Childhood Programs will only disclose the minimum amount of information necessary to meet the purpose of the disclosure. If you have questions about how your information is used or shared, or if you would like to review your records, please contact us.

Policies and Procedures for the Protection of Personally Identifiable Information (PII)

Disclosure with Parental Consent

1. NMCAA Early Childhood Programs will obtain a parent's written consent before disclosing PII from child records, unless otherwise permitted by law. The "Parent Disclosure of Information" form will be used to document consent and will include what records may be disclosed, the purpose of the disclosure, and the party or class of parties to whom the disclosure may be made.

Written consent must be signed and dated. This may include an electronic signature that identifies and authenticates the individual providing consent and indicates their approval.

2. The "Parent Disclosure of Information" form will clearly state that consent is voluntary and may be revoked at any time. Revocation is not retroactive and does not apply to actions taken before consent was withdrawn.

Disclosure Without Parental Consent, With Prior Notice

NMCAA Early Childhood Programs may disclose PII from child records without parental consent to another program, school, or school district in which the child seeks or intends to enroll, or is already enrolled, when the disclosure is related to enrollment or transfer.

In these cases, the program will notify the parent, provide access to the records upon request, and give the parent an opportunity to review, challenge, and refuse the disclosure before records are shared.

Disclosure Without Parental Consent

NMCAA Early Childhood Programs may disclose PII from child records without parental consent to the following:

1. Program officials, contractors, or sub-recipients who provide services on behalf of the program, when access to the information is necessary to deliver Head Start or GSRP services and appropriate safeguards are in place;
2. Federal or state officials, or authorized representatives, for the purpose of audits, evaluations, or to ensure compliance with program requirements, with protections for the use and destruction of the information;
3. Authorized parties conducting studies to improve child and family outcomes or program quality, with safeguards to protect and properly dispose of PII;
4. Appropriate parties when necessary to respond to a health or safety emergency, or to address a serious risk to a child or others;
5. Appropriate authorities to comply with a judicial order or lawfully issued subpoena, with reasonable efforts to notify the parent in advance when permitted by law;
6. Authorized representatives from the U.S. Department of Agriculture or Food and Nutrition Service for monitoring and evaluation of the Child and Adult Care Food Program, in accordance with confidentiality requirements;
7. A caseworker or representative of a child welfare agency legally responsible for a child in foster care, when access is required to support the child's care and protection, and the agency agrees to protect the information;
8. Appropriate parties to report suspected or known child abuse or neglect, in accordance with applicable laws.

Written Agreements with Third Parties

When NMCAA Early Childhood Programs establish a written agreement with a third party to share information, the agreement will be reviewed annually and updated as needed to ensure continued protection of PII.

If a third party violates the agreement, the program may:

1. Provide an opportunity to correct the issue; or
2. Prohibit the third party from accessing records for a period determined by the program's governing body and Policy Council.

Limit on Disclosure

NMCAA Early Childhood Programs will only disclose the minimum amount of information necessary to meet the purpose of the disclosure.