



<b>Department: Education</b>	<b>Approval Date: Policy Approved 3/14/2022</b>	<b>Procedure Number: 4010b</b>
<b>Regulation Number: 1302.33(b-d) 1302.102(c)(2)(ii) 1302.101(b)(4) MARC HS Policy 4010</b>	<b>Regulation Topic: Education and Child Development</b>	<b>Procedure Title: Personally Identifiable Information Precautions for Ongoing Child Assessment</b>

**Procedures:**

MARC Head Start will support and monitor direct service providers’ development of a procedure for protecting children’s personally identifiable information in the Learning Genie® application. MARC Head Start staff will review the procedures and provide feedback.

The procedures should include guidance for direct service provider staff such as:

- Staff will only use iPads, laptops, and other equipment that is owned by the direct service provider for assessment of children. No personal equipment will be used.
- Staff will use their work email addresses to log into Learning Genie. No personal emails will be used.
- Equipment used by teaching and home visiting staff will be password protected.
- Direct service providers will be encouraged to collect the passwords for iPads so that they can continue to use the iPads if a staff member leaves unexpectedly.
- There is a Family Engagement Suite in Learning Genie. It will not be included in the MARC contract. If they choose, direct service providers will enter into a separate contract with Learning Genie for that suite of services.
- Direct service providers will develop a system for providing initial training/communication to staff about protecting children’s personally identifiable information. This system will include a specific training about using the Family Engagement Suite if it is being used by the provider. The training/communication will include steps for ensuring that no anecdotes, photos, or videos of one child are accessible to another child’s family.

Adherence to the above regulations and this policy is subject to random monitoring by MARC Head Start staff.

Effective Date: July 1, 2022