

ChildWare Policy and Procedure

Data Retention & Archive Policy for ChildWare

Released September 2018

Background

ChildWare has been an active data system for approximately a decade and as a result, a policy for retaining and archiving data for the live system is needed. The ChildWare team has developed the following policy and procedure document. This new archive policy will go into effect during the 2018/2019 contract year. If agencies request exceptions to this policy, they will be considered on a case-by-case basis.

Definitions:

Contract Year – July 1 to June 30 of the following year. Example: the current contract year is July 1, 2018 to June 30, 2019.

Active Agency – an agency with a current contract for ChildWare or an agency that falls under a current contract with an Alliance. A deactivated agency is one that has terminated its contract with ChildWare.

Active Site – a child care site that is part of an active agency and is enrolling children within the contract year. A deactivated site is a site that has closed or is no longer actively enrolling children within an Alliance contract for ChildWare.

For Active Sites within an Active Agency

Discharged children:

Data for children (and related adult contacts) that have been discharged or were referred but did not enroll (remain on the waiting list, pending, etc..) will be retained in ChildWare for one full contract year following the year that the child was discharged or referred, after which that data will be archived. Data on these children will be accessible in the archives for one year after. If the agencies would like to recall that data because they want to re-enroll the child, the agency will need to make a request to the help desk to re-activate the child's record.

Example: if a child was discharged in February 2018, that child's record would be maintained in ChildWare until June 30, 2020 (through the 2018/2019 contract year and then for one more year).

Terminated staff:

Data for staff whose employment termination has been recorded in ChildWare will be retained in ChildWare until the end of the contract year in which their position was terminated, after which that data will be archived.

Example: if a staff member is terminated in ChildWare in February 2018, their data will be maintained in ChildWare until June 30, 2018.

For a Deactivated Site within an Active Agency

Data related to a deactivated site for an active Agency will be retained in ChildWare for the remainder of the current contract year or, if an agency deactivates the site at the end of the contract year, for 6 additional months into the new contract year. After that time, the data related to that site will be permanently archived. The ChildWare Team will assist the staff at the agency to identify records of children, adults and staff that should be linked to the remaining active sites and not archived.

For a Deactivated Agency

Data related to deactivated agency and all of its related sites will be retained in ChildWare for the remainder of the current contract year or, if an agency cancels at the end of the contract year, for 6 additional months into the new contract year.

Example 1: if an agency cancels their contract in February, the data will be archived after June 30 of that year, which is the end of the contract year.

Example 2: if an agency cancels their contract in June at the end of the contract year, the data for that agency will be archived after December 30 of the same calendar year.

Maintenance of Archived Records

All archived records will be maintained for a minimum of seven years to comply with the most restrictive regulation standard that could be applied to relevant children. Some records may be maintained in archives for research purposes beyond that time.

Relevant regulations:

Head Start Performance Standards (Sept 2016)

1302.12 Determining, verifying, and documenting eligibility.

(k) Records.

(1) A program must keep eligibility determination records for each participant and ongoing records of the eligibility training for staff required by paragraph (m) of this section. A program may keep these records electronically.

(3) A program must keep eligibility determination records for those currently enrolled, as long as they are enrolled, and, for one year after they have either stopped receiving services; or are no longer enrolled.

PA Code: Chapter 3270 Child Day Care Centers

§ 3270.185. Record retention

A copy of the child's record shall be retained at the facility for at least 1 year after termination of service, unless the entire record is transferred by the operator to the parent or guardian or to another agency at the request of the parent or guardian.

Pennsylvania Pre-K Counts Statute, Regulations and Guidelines

Effective July 1, 2017

§ 405.62. Recordkeeping

Approved providers shall maintain all records pertinent to the program, including, but not limited to, financial, statistical, property, changes in Keystone STARS status, child care certificate, nursery school license, teacher evaluations and recommendations, and any other supporting documentation, for a period of at least 7 years from the date of submission of their final closeout report, or until all audits are complete and findings have been completely resolved, whichever occurs last.

Recordkeeping:

Providers must maintain all pertinent records for a minimum of seven years (or until all unresolved issues have been addressed). This includes but is not limited to all documents related to operating requirements, child records, teacher evaluations, and all other supporting documents. In addition, grantees are also expected to maintain books, records, documents, and other evidence in sufficient detail to support all claims against the Pennsylvania Pre-K Counts funding.

Philadelphia PHLpreK Contractual Requirements

(Subject to change)

Providers agree to maintain for five (5) years after final payment is made under the Agreement and all pending matters are closed and to make available to authorized personnel of PHMC and the City (including the City Controller's Office) or their designees, such records as may be necessary for audit purposes. If an audit, litigation or other action involving the records is started before the end of the five (5) year period, Providers agree to maintain the records until the end of the five (5) year period or until the audit, litigation or other action is completed, whichever is later.