DATA PRIVACY AND SECURITY POLICY

The privacy of students, their families, school-based health center (SBHC) staff, SBHC sponsoring organizations, and all participants in the National Survey of SBHCs (formerly the Census of SBHCs), the National Quality Initiative (NQI), and any other data collection efforts is of utmost importance to the School-Based Health Alliance ("the Alliance"). This Data Privacy and Security Policy ensures the Alliance's commitment to protect all information entered in the Alliance's Data Portal and the privacy of all Data Portal users and related groups involved.

WHO CAN ACCESS THE DATA PORTAL AND DATA COLLECTED THROUGH THE PORTAL?
Each user will enter the Data Portal through a unique login name and password selected by that individual. This ensures that they will only receive information, surveys, and reports appropriate to their role. Three types of users can access the Data Portal with varying levels of permissions to enter or view data.

1. *State/regional SBHC program office, SBHC state affiliate office, or SBHC sponsor organization representatives:* This user is an administrator from a state/regional SBHC program office, SBHC state affiliate office, or an SBHC's lead sponsoring/administrative organization. Representatives from these organizations can enter data and access reports for the SBHCs for which their office serves as the funder, administrator, advocate, and/or sponsoring organization.
2. *Representatives for individual SBHCs participating in the National Survey and/or the NQI:* This user is an SBHC staff member designated as responsible for entering data for the SBHC. The SBHC staff member can enter data for the SBHC he/she works in and can access reports only for that SBHC.
3. *Data Portal administrators:* The Alliance's project staff, research consultants, and expert faculty do not add data, but have full access to all data entered in the Data Portal and can access reports for all of the SBHCs that report data.

WHAT DATA ARE ENTERED INTO THE DATA PORTAL?
Participants report SBHC characteristics (e.g., location, staffing, services) and only aggregate SBHC client data. Participants will NOT provide ANY "protected health information" (PHI) about SBHC clients, such as an individual's past, present or future physical or mental health or condition; the provision of health care to an individual; or the past, present, or future payment for the provision of health care to an individual. Furthermore, participants will not provide ANY PHI that identifies an individual or for which there is a reasonable basis to believe the data can identify an individual. Individually identifiable health information never shared with the Alliance includes many common identifiers (e.g., name, address, birth date, medical record number).

The types of data fields in the Data Portal follows:
1. **Basic SBHC and school characteristics:** Basic SBHC characteristics include contact information; school, campus, and student population characteristics; and SBHC services and staffing.
2. **Aggregate client data to calculate NQI standardized performance measures:** Aggregate client data include the total number of unduplicated clients who had at least one visit to the SBHC during the school year; and the total number of visits of any type provided to SBHC clients during the school year. Standardized performance measures include the five performance measures for SBHCs. Examples of data requested for these measures include the total number of unduplicated clients with at least one risk assessment completed during the school year and the total number of unduplicated clients with at least one well child visit completed during the school year.

The Alliance will report all data in aggregate (no individually identifiable student information will ever be requested).

HOW ARE DATA USED? Data are utilized by Alliance staff and research consultants to describe the locations and characteristics of SBHCs and to increase understanding and improve SBHC accountability, excellence, and sustainability. Information provided about each SBHC will be compiled in aggregate to understand descriptive information about SBHCs and performance of SBHCs nationwide.

Information entered in the Data Portal will be shared with participants through downloadable reports. Individual SBHCs participating in the NQI will be able to view their own SBHC's data in the reports as well as averages from all sites participating in the NQI.

In order to advance school health services, nationwide data is shared by the Alliance ONLY in the aggregate. However, de-aggregated data may be shared with the following individuals:
1. ***SBHC state program offices and/or state affiliate office representatives*** will receive datasets with information from the portal identified by SBHC for SBHCs located in their state only, upon request.
2. ***Outside research partners*** may request datasets to conduct research on SBHCs nationally. These individuals are required to sign *Data Use Agreements* (DUA) that outline how data will be used, stored, and shared. As part of the DUA, they are not permitted to report data that would identify individual SBHCs in any way.

HOW ARE DATA STORED? The Data Portal uses website cookies and log files to store non-personal data only. Cookies on the Data Portal are never set across websites to track movement from site to site.

OUR COMMITMENT TO DATA SECURITY: To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, the Alliance has put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online, including but not limited to Secure Sockets Layer (SSL) security, encrypted databases, internal security audits, and staff policies.

We respect students', schools', SBHCs', and all partners' rights to privacy. In recognition of the sensitive nature of the data collected through the use of the Data Portal, multiple access levels exist so that each type of user - state/regional SBHC program office, SBHC sponsor organization representatives, representatives of SBHCs participating in the National Survey and/or NQI, and Data Portal administrators - are granted specific data permissions.

To ensure the security and privacy of all data entered in the portal, several physical, network, hardware, and appropriate software safety precautions are in place. The firewall restricts access to data to those who have requisite permission levels. All logins have strong password rule enforcement. Data stored online are protected using algorithms and separation of encrypted data from keys.

CHANGES TO PRIVACY POLICY: This Privacy Policy occurred on May 24, 2021. The Alliance reserves the right to make minor changes to this policy at any time by posting the revised Privacy Policy on this site.

CONTACT US: Questions about our privacy policy? Please contact us at research@sbh4all.org or (202) 638-5872.