

School Health Services NATIONAL QUALITY INITIATIVE

Accountability • Excellence • Sustainability

an initiative of the School-Based Health Alliance and the Center for School Mental Health

NATIONAL QUALITY INITIATIVE 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 Quality Initiative (NQI) 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 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 portal through a unique login name and password selected by that individual. This ensures that they will be provided with information, surveys, and reports appropriate to their role only. There are three types of users that can access the data portal. The following text explains permissions for each data portal user type.

- 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 or SBHC state affiliate office or an SBHC’s lead sponsoring/administrative organization. State/regional SBHC program office, SBHC state affiliate office, and SBHC sponsor organization representatives 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 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. NQI Data Portal administrators:** The Alliance’s NQI project staff, improvement advisor, and expert faculty do not add data, but have full access to all data entered in the NQI Data Portal and can access reports for all of the SBHCs participating in the NQI.

WHAT DATA ARE ENTERED INTO THE DATA PORTAL? Participants will only be asked to report aggregate, de-identified health center client data.¹ Participants will NOT provide ANY "protected health information (PHI)" about health center 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 the individual or for which there is a reasonable

¹ De-identified health information neither identifies nor provides a reasonable basis to identify an individual. There are two ways to de-identify information; either: (1) a formal determination by a qualified statistician; or (2) the removal of specified identifiers of the individual and of the individual’s relatives, household members, and employers is required, and is adequate only if the covered entity has no actual knowledge that the remaining information could be used to identify the individual.

basis to believe it can be used to identify the individual. Individually identifiable health information includes many common identifiers (e.g., name, address, birth date, Social Security Number) and will NOT be provided to the Alliance as a part of the initiative.

The types of data that can be entered into the data portal are as follows:

1. **Basic SBHC and School Characteristics:** Basic SBHC characteristics include: health center contact information; school, campus and student population characteristics; and health center operations.
2. **Aggregate, De-Identified Client Data to Calculate Standardized Performance Measures:** Aggregate, de-identified client data include: total # of unduplicated clients who had at least one visit to the SBHC during the school year; and the total # of visits of any type provided to SBHC clients during the school year.

Standardized performance measures include the five performance measures for SBHCs. The five performance measures include:

1. **Well-child visit:** Percentage of unduplicated SBHC clients ages 0-21 who had at least one comprehensive well-care visit with a primary care practitioner or an OB/GYN practitioner during the school year, regardless of where exam was provided, including documentation of:
 - Health and developmental history AND
 - Physical exam AND
 - Health education/ anticipatory guidance
2. **Annual risk assessment:** Percentage of unduplicated SBHC clients with ≥ 1 age-appropriate annual risk assessment during the school year
3. **BMI assessment and nutrition/physical activity counseling:** Percentage of unduplicated SBHC clients aged 3-17 years seen during the school year with documentation of the following at least once during the school year (reported for all clients and only those with BMI ≥ 85 th percentile):
 - BMI percentile AND
 - Counseling for nutrition AND
 - Counseling for physical activity
4. **Depression screening and follow-up:** Percentage of unduplicated SBHC clients aged ≥ 12 years with documentation of the following at least once during the school year:
 - Screened for clinical depression using an age appropriate standardized tool AND
 - Follow-up plan documented if positive screen
5. **Chlamydia screening:** Percentage of unduplicated SBHC clients (male or female) identified as sexually active who had ≥ 1 test for Chlamydia documented during the school year

All data will be reported in aggregate (no individually identifiable student information will be requested).

HOW ARE DATA USED? Data are only utilized for establishing better understanding and improving 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 relative to the standardized performance measures.

Information entered in the 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 ONLY in aggregate.

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 NQI participants' rights to privacy. In recognition of the sensitive nature of the data collected through the use of the Data Portal, multiple access levels have been developed so that each type of user – State/regional SBHC program office, SBHC sponsor organization representatives, Representatives of SBHCs participating in the NQI, and NQI 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 was posted in June 1, 2018. School-Based Health Alliance reserves the right to make minor changes to this policy at any time by posting the revised Privacy Policy on this site. Material changes to the Privacy Policy will not take effect without the consent of customers.

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