City of Seattle Privacy Impact Assessment

CHILD CARE NUTRITION PROGRAM

Owner: Human Services Department

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Seattle
Information Technology

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PURPOSE OF PIA

A Privacy Impact Assessment is designed to outline the anticipated privacy impacts from a City project/program or project/program update that collects, manages, retains or shares personal information from the public. The PIA will provide project/program details that will be used to determine how privacy impacts may be mitigated or reduced in accordance with the City of Seattle Privacy Principles and Privacy Statement.

ABSTRACT

*Please provide a brief abstract. The abstract is the single paragraph that will be used to describe the project and **will be published on the Privacy Program website.** It should be a minimum of three sentences and a maximum of four, and use the following format:*
- *The first sentence should include the name of the project, technology, pilot, or project/program (hereinafter referred to as "project/program").*
- *The second sentence should be a brief description of the project/program and its function.*
- *The third sentence should explain the reason the project/program is being created or updated and why the PIA is required. This sentence should include the reasons that caused the project/program to be identified as a "privacy sensitive system" in the Privacy Intake Form, such as the project/program requiring personal information, or the technology being considered privacy sensitive.*

The Child Care Nutrition Program (CCNP) is a United States Department of Agriculture (USDA) funded program that provides reimbursement to licensed family child care providers to help them provide healthy, nutritious meals to the children in their care. The program uses the Minute Menu (MM) database to collect information about the provider and the children in care, and to process and pay providers' claims. The PIA is required because this program is regulated by USDA and gathers personal information about providers and the children in their care.

PROJECT/PROGRAM OVERVIEW

Please provide an overview of the project/program. The overview provides the context and background necessary to understand the project/program's purpose and mission and the justification for operating a privacy sensitive project/program. Include the following:
- *Describe the purpose of the system, technology, pilot or project/program; the name of the department that owns or is funding the project/program and how it the project/program relates to the department's mission;*
- *Describe how the project/program collects and uses personal information, including a typical transaction that details the life cycle from collection to disposal of the information;*
- *Describe any routine information sharing conducted by the project/program both within City of Seattle departments and with external partners. Describe how such external sharing is designed with the original collection of the information.*
- *Identify any major potential privacy risks identified and briefly discuss overall privacy impact of the project/program on individuals*

- *Identify the technology used and provide a brief description of how it collects information for the project/program.*

The Child Care Nutrition Program is part of USDA's Child and Adult Care Food Program (CACFP) which also regulates school lunch. This ensures children have good quality meals in child care and school. The Child Care Nutrition Program is in the Human Services Department, Youth and Family Empowerment Division. HSD supports the program with general funds. USDA provides reimbursement for payments made to providers and an administration fee for administering the program. The Human Services mission is "To connect people with resources and solutions during times of need so we can all live, learn, work, and take part in strong, healthy communities. The CCNP provides reimbursement to child care providers so they can provide healthy food for the children in their care, so the children can grow, learn, and be successful.

When a new provider contacts us to join the program, we go to the provider's home to provide technical assistance and training on the USDA rules and regulations of the program. We help the provider fill out and sign paperwork required by USDA to participate on the program. We also ask the provider to fill out and sign City paperwork, W-9s and Contract Authorization forms, so they can become a vendor of the City and be paid. This paperwork is brought into the office, it is then entered into our database, Minute Menu and into Summit, the City's payment system, so the provider can be paid when claim filing begins. The paperwork is stored in the providers permanent file and put into locked file cabinets. While the provider is actively participating in the program, the file remains in the Child Nutrition unit located on the 56th Floor of the Seattle Municipal Tower. When a provider terminates from the program, these files are sent to archives, then destroyed after 7 years. For a provider to claim and be paid for meals served to children while in care, the family fills out and signs an enrollment form stating that the child attends a particular child care. The signed enrollment form contains the child's name and birthdate, address and phone number of the parent or guardian. It is filed in the providers permanent file as well.

Provider information is shared with our sponsoring state agency, the Office of Superintendent of Public Instruction (OSPI). The state has access to the provider's information, but not the child's. Information about the provider is used by the state to be sure the provider is paid correctly and to reimburse the City for claims it has paid. Current provider and payment information is submitted to OSPI through our database Minute Menu. Tax id numbers are shared with our Accounts Payable unit only.

Our Minute Menu database can collect information about children through our Web-based program, Kidkare. More than half of our providers submit their monthly claims on-line, so they enter child information directly into their Web-based program. This information is automatically transferred daily to our data base from Minute Menu. Other providers provide their information to us via phone or mailed in on hard copy forms.

NOTIFICATION

1. ***How does the project/program provide notice about the information that is being collected?*** *Our Privacy Principles and Statement require that we provide notice to the public when we collect personal information, whenever possible.*
   - *Describe how notice will be provided to the individuals whose information is collected by this project/program and how it is adequate.*
   - *If notice is not provided, explain why not. (For certain law enforcement or other project/programs, notice may not be appropriate.)*
   - *Discuss how the notice provided corresponds to the purpose of the project/program and the stated uses of the information collected.*

   CCNP staff gathers this information in person, in the home of the childcare provider, when the orientation and training is done, before they start filing claims through the program. Notice of Public Disclosure Requests were not given.

   Notice was not provided before this time. A statement will be added to our materials to ensure the provider is notified of the possibility of a Public Disclosure Request.

   The notifications, either on electronic forms or paper forms will pertain to provider information that could be found in the City's data base.

2. ***What opportunities are available for individuals to consent to the use of their information, decline to provide information, or opt out of the project/program?*** *Describe how an individual may provide consent for specific uses or whether consent is given to cover all uses (current or potential) of his/her information. If specific consent is permitted or required, how does the individual consent to each use? If notice is provided explain how an individual may exercise the right to consent to particular uses or decline to provide information describe the process. If this is not an option, explain why not. Note: An example of a reason to not provide an opt-out would be that the data is encrypted and therefore unlikely available to identify an individual in the event of a data breach.*

   Provider information is gathered so they can participate in the program. Providers are given information about why certain information is needed and how it is used. Provider and child information is password protected on the provider Web-based claiming system and in our database. The information we have within the City's system is also password protected. Information about families is not shared with the state. The child information CCNP requires is the same information that the Department of Early Learning requires the family to give to the provider in order for the provider to care for their child. A provider always has the option to provide information or not. It may mean that the provider cannot participate in the program, or they might not be able to be paid for a particular child. For example, if a parent does not want to provide a date of birth for their child, the provider would not be able to claim that child. Racial information is used for demographic purposes only.

COLLECTION

3. ***Identify the information, including personal information, that the project/program collects, uses, disseminates, or maintains.*** *Explain how the data collection ties with the purpose of the underlying mission of the department.*

Personal information collected from providers include name, address, date of birth and Department of Early Learning licensing information. Tax ID numbers are also required so a provider can become a vendor of the City. For some providers, income information is required for the following reason: this program has a 2-tier payment system that depends on where a provider lives or if they are income eligible. Providers are paid a higher rate of reimbursement if they live in a census or school reference area that has a free or reduced lunch rate of 50% or more. This is called a Tier 1 area. If a provider does not live in a Tier 1 area, they can provide income documentation, a copy of their signed 1040 and Schedule C, to see if they qualify for the higher rate of reimbursement. If a Tier 1 provider wants to claim their own children when other day care children are present, the provider would need to fill out an income application. Documentation of income is not required with a Tier 1 provider. Providers who live in areas where the reference area is less than 50% free/reduced lunch are paid at a lower rate, or what is known as a Tier 2 rate. The collection of this data helps family child care providers get the help they need to feed the children in their care the best quality food they can. The CCNP also provides nutrition education as part of the training that is required to participate in this program. Providers learn the importance of a good quality diet and how this impacts clients and their families. This program meets the mission of HSD to connect people with resources and solutions during times of need so that we can all live, learn, work, and take part in strong, healthy communities.

4. ***Is information being collected from sources other than an individual, including other IT systems, systems of records, commercial data aggregators, publicly available data and/or other departments?*** *State the source(s) and explain why information from sources other than the individual is required.*

Other information may be gathered from the Department of Early Learning's (DEL) Child Care Check website. This helps us determine if a provider is in good standing with DEL and can participate in CCNP.

USE

5. ***Describe how and why the project/program uses the information that is collected.*** *List each use (internal and external to the department) of the information collected or maintained. Provide a detailed response that states how and why the different data elements will be used.*

Provider name, address, and phone number are used in several ways. Since CCNP is a federally regulated program, providers are monitored 3 times a year. Our first orientation visit determines that this is an actual child care home and the provider lives there. A provider must live on-site to be licensed as a family child-care provider. To monitor the provider in accordance with USDA regulations, a current address is essential. A current address also determines what rate a provider will be paid for the meals served (see question 3). Birthdates are required to determine if a provider

is on the National Disqualified list. If the provider is on the disqualified list, they may not participate on the CCNP program for 7 years. Tax ID numbers are required by the City for anyone who wants to be paid by the City.

Child Enrollment Information: A child must be enrolled in our program by the provider. Name, address and birthdate of the child is required for a provider to be paid for the child's meals. Parent contact information is used at times to do parent contacts. Discrepancies are occasionally found at reviews regarding child attendance. Parents are contacted to confirm information received from the provider. Birthdates are used at reviews by monitors to determine if a provider is over-capacity or not. As mandated reporters, we must determine if a site is safe. If a provider has too many children on site or too many children in a certain age group, CPS must be notified.

6. ***Does the project/program use technology to:***
    a. ***Conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly or***
    b. ***Create new information such as a score, analysis, or report?***

    The Child Care Nutrition Program uses our Minute Menu data base to ensure all providers will be reimbursed correctly for the meals served.

7. ***How does the project/program ensure appropriate use of the information that is collected?*** *Describe any types of controls that may be in place to ensure that information is handled in accordance with the uses described above.*

    Once information is entered in the Minute Menu data base, it can only be used by CCNP staff. The provider's payment information is forwarded to Vender Relations for approval of a vendor number which is needed for the provider to be paid. Hard documents are filed in the providers permanent file.

RETENTION

8. ***Does the project/program follow the City records retention standard for the information it collects?*** *Departments are responsible for ensuring information collected is only retained for the period required by law. City departments are further responsible for reviewing and auditing their compliance with this process. For more information, please see the internal retention schedule, [here](#), and records retention ordinance, [here.](#)*

    In addition, please provide answers to the following questions:
    - *How does it dispose of the information stored at the appropriate interval?*
    - *What is your audit process for ensuring the timely and appropriate disposal of information?*

    USDA requires that information be kept on-site or easily retrievable for 3 years plus the current year. We keep 3 years of information in locked filing cabinets in the unit located on the 56th floor of the Seattle Municipal Tower. Files dated beyond that are archived yearly. They are destroyed according to the records retention schedule.

SHARING

9. ***Are there other departments or agencies with assigned roles and responsibilities regarding the information that is collected?*** *Identify and list the name(s) of any departments or agencies with which the information is shared and how ownership and management of the data will be handled.*

   We share our information only with The Office of the Superintendent of Public Instruction (OSPI) at the state level for claims reimbursement. This information is password protected in their database.

10. ***Does the project/program place limitations on data sharing?***
    Describe any limitations that may be placed on external agencies further sharing the information provided by the City of Seattle. In some instances, the external agency may have a duty to share the information, for example through the information sharing environment.

    OSPI may share information with USDA as part of the auditing process. It is not shared publicly.

11. ***What procedures are in place to determine which users may access the information and how does the project/program determine who has access?*** *Describe the process and authorization by which an individual receives access to the information held by the project/program, both electronic and paper based records. Identify users from other departments who may have access to the project/program information and under what roles these individuals have such access. Describe the different roles in general terms that have been created that permit access to such project/program information. Specifically, if remote access to the system is allowed or external storage or communication devices interact with the system, describe any measures in place to secure the transmission and storage of data (e.g., encryption and/or two-factor authentication).*

    Employees of the Child Care Nutrition Program are the only individuals who have access to our database, Minute Menu. This includes the supervisor of the program, the accounting technician and the monitors. These employees are given access to the program by giving them a login and password. Each CCNP employee has keys to the locked cabinets. At this point, there is not remote access to the program. Once a day, the parent company, Minute Menu Systems, does a transfer of information back and forth between their web location and ours.

12. ***How does the project/program review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within City of Seattle and outside agencies?*** *Please describe the process for reviewing and updating data sharing agreements.*

    We have an agreement with OSPI to share information to reimburse the City for the claims the City has paid. We have a maintenance agreement with Minute Menu Systems to ensure we will have regularly updated, and current information as regulations change on the federal level, and to insure our system is in exemplary working order.

LEGAL OBLIGATIONS AND COMPLIANCE

13. ***Are there any specific legal authorities and/or agreements that permit and define the collection of information by the project/program in question?***
    - *List all statutory and regulatory authority that pertains to or governs the information collected by the project/program, including the authority to collect the information listed in question.*
    - *If you are relying on another department and/or agency to manage the legal or compliance authority of the information that is collected, please list those departments and authorities.*

    The program is funded and regulated by USDA. All information collected is required by federal regulation. OSPI is the state agency that reviews our program and acts as a pass-through agency for funding.

14. ***How is data accuracy ensured?*** *Explain how the project/program checks the accuracy of the information. If a commercial data aggregator is involved describe the levels of accuracy required by the contract. If the project/program does not check for accuracy, please explain why. Describe any technical solutions, policies, or procedures focused on improving data accuracy and integrity of the project/program.*

    Each month, the supervisor oversees the accuracy of payments and tiering determination updates. She also reviews any concerns that monitors, or providers have about updating information in the data base. CCNP monitors and the accounting 2 are the first line in being sure any information given to them by providers is taken care of in a timely manner and in a secure way.

15. ***What are the procedures that allow individuals to access their information?***
    Describe any procedures or regulations the department has in place that allow access to information collected by the system or project/program and/or to an accounting of disclosures of that information.

    CCNP staff have access to our data base which is password protected. No one else in the department or division has access to this information. Individual providers are able to use a Web-based program, kidkare, to keep their menus, attendance records, child information, and to submit claims. Each provider has their own individual login and password information.

16. ***What procedures, if any, are in place to allow an individual to correct inaccurate or erroneous information?*** *Discuss the procedures for individuals to address possibly inaccurate or erroneous information. If none exist, please state why.*

    Providers are frequently in touch with their monitors to keep them well-informed regarding any changes that need to be made. If a monitor notices inaccurate information, they will contact the provider to verify and update the data base. CCNP needs to have the most current contact information and licensing updates; this information will affect the provider's reimbursement rate and the timely receipt of their reimbursement check.

17. ***Is the system compliant with all appropriate City of Seattle and other appropriate regulations and requirements?*** *Please provide details about reviews and other means of ensuring systems and project/program compliance.*

CCNP makes every effort to be compliant with USDA, OSPI, and City of Seattle regulations and requirements. Our data base, Minute Menu, updates our data base when new federal regulations are put into place, so we are current with USDA standards. In addition, the Child Care Nutrition Program is reviewed bi-annually by OSPI for compliance.

18. ***Has a system security plan been completed for the information system(s) supporting the project/program?*** *Please provide details about how the information and system are secured against unauthorized access.*

The database is password protected. Files are stored in locked cabinets and sensitive information is secured.

19. ***How is the project/program mitigating privacy risk?*** ***G****iven the specific data elements collected, discuss the privacy risks identified and for each risk explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.*

When monitors plan their site reviews, a review worksheet is generated from our database which contains the following information:

- Provider name, address, phone number, email and birthdate
- Login and Password for providers' own website
- Enrolled children's name and birthdate
- Payment information for the last 3 months of claims

To mitigate privacy risk CCNP takes the following steps:

1. Provider Contact information – Monitors use this information while in the field to get to the site, contact a provider to ask questions or directions and to confirm a provider is at the site, etc.
2. Login and password are specific to each provider for access to their Web-based program. It is used to provide technical assistance to the provider if they are having trouble completing tasks on the website, or to answer questions they might have submitting their claim.
3. The providers' birthdate is crossed out when using the review worksheet in the field.
4. Child Information – Full names and birthdates are needed to be able to confirm if a provider is over licensed capacity by age at the site review.

While in the field, review work sheets are kept secure with the monitor. Once site reviews are completed, the review worksheet and filled out, signed review form is returned to the office, so it can be entered into the Minute Menu database. If the monitor is out in the field for a few days, the forms are kept with the monitor until the monitor returns to the office.

New applications must be filled out and signed each year by the provider. Information included on the application is as follows: name, address, phone number, email address, date of birth, licensing information, tiering information, days of operation, hours of operation, and meal

times. Monitors take the application out for site reviews where the form is completed and signed by the provider. The forms are returned along with other review information.

Monitors must bring all forms back into the office where they will be stored in a locked desk drawer and/or file cabinet until data entry is completed.

MONITORING AND ENFORCEMENT

20. ***Describe how the project/program maintains a record of any disclosures outside of the department.*** *A project/program may keep a paper or electronic record of the date, nature, and purpose of each disclosure, and name and address of the individual or agency to whom the disclosure is made. If the project/program keeps a record, list what information is retained as part of the accounting requirement. A separate system does not need to be created to meet the accounting requirement, but the project/program must be able to recreate the information noted above to demonstrate compliance. If the project/program does not, explain why not.*

    For the purposes of billing OSPI, an electronic file is created and then uploaded into OSPI WINS system. Each upload is date-stamped, and an electronic copy is maintained on the supervisor's j: drive.

21. ***Have access controls been implemented and are audit logs are regularly reviewed to ensure appropriate sharing outside of the department?*** *Is there a Memorandum of Understanding (MOU), contract, or agreement in place with outside agencies? Discuss how the sharing of information outside of the Department is compatible with the stated purpose and use of the original collection.*

    The City has an agreement with OSPI that outlines the payment method in use.

22. ***How does the project/program ensure that the information is used in accordance with stated practices of the project/program?*** *What auditing measures are in place to safeguard the information and policies that pertain to them? Explain whether the project/program conducts self-audits, third party audits or reviews.?*

    The supervisor conducts quality control reviews of claims and program information monthly. The program is reviewed bi-annually by our state agency, OSPI.

23. ***Describe what privacy training is provided to users either generally or specifically relevant to the project/program.*** *City of Seattle offers privacy and security training. Each project/program may offer training specific to the project/program, which touches on information handling procedures and sensitivity of information. Discuss how individuals who have access to personal information are trained to handle it appropriately. Explain what controls are in place to ensure that users of the system have completed training relevant to the project/program.*

    Staff have completed privacy and security training that was offered by the City. Notation of completion of the training was made on their 2016 performance evaluation. Security information is discussed at staff meetings and one-on -ne staff check-ins.

24. ***Is there any aspect of the project/program that might cause concern by giving the appearance to the public of privacy intrusion or misuse of personal information?*** *Examples might include a push of information out to individuals that is unexpected and appears to be intrusive, or an engagement with a third party to use information derived from the data collected that is not explained in the initial notification.*

No, every effort is made to ensure the information gathered for use in this program is protected and only used in conjunction with USDA regulations.