**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.
- MARC Head Start will include the Family Engagement Feature in the MARC Learning Genie contract only for children and families enrolled in home-based programs. Center-based direct service providers will enter their own separate contract with Learning Genie if they choose to use the Family Engagement Feature.
- 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 Feature, if the program is using it. 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, 2018