



BOARD POLICY

Data Security & Privacy

Section:	Governance		
Subject:	Data Security and Privacy		
Effective Date:	April 15, 2026	Review Date:	April 15, 2026
Approved: KHA Board, April 22, 2026			

AUTHORITY:

Ordinance Code, Section 77.108(b)(18) – Kids Hope Alliance Powers:

KHA in developing, overseeing, implementing and managing the Essential Services Plan for Kids under this Chapter shall have the power to “make and adopt bylaws, rules, regulations and policies for the Board’s guidance, operation, and governance; however, the Board’s bylaws, rules, regulations and policies shall not be inconsistent with this Chapter, Federal or State laws or other applicable City ordinances.”

POLICY STATEMENT:

The Kids Hope Alliance (KHA) Board is committed to protecting the security, confidentiality, and privacy of all student education records and employee information, including data obtained through our Providers, Level 2 background screenings and law-enforcement alert systems. KHA shall comply with all applicable federal and state laws governing data privacy and personnel screening, including FERPA, Florida Statutes related to background screening, and related rules.

POLICY:

1. Delegation to the CEO and Administration

The Board directs the CEO to establish, maintain, and enforce administrative procedures that ensure the secure collection, storage, use, retention, and disclosure of:

- Student education records protected under FERPA.
- Background screening information and eligibility determinations for KHA employees and provider personnel.
- Law-enforcement notifications, including arrest alerts and eligibility changes received through FDLE, FBI, or Clearinghouse systems.

2. Responsibilities of the CEO

The CEO shall ensure effective implementation of this policy by:

- Protecting personally identifiable information consistent with FERPA and state law.
- Controlling and maintaining access to sensitive information using the principle of least privilege and role-based permissions.
- Establishing clear procedures, timelines, and actions for responding to any law-enforcement

alert or eligibility change.

- Requiring verification, eligibility review, and appropriate employment or provider-contract actions when warranted.
- Including FERPA compliance, screening obligations, and notification duties in all provider agreements.
- Implementing training, monitoring, and an annual review of all privacy, screening, and incident-response procedures.

3. Compliance and Reporting to the Board

The CEO shall provide the Board, at least annually, or immediately in the event of a significant incident, with reports summarizing:

- Compliance with data security, privacy, and screening requirements.
- Screening and eligibility compliance for KHA and provider personnel.
- Any significant alerts, incidents, or breaches of protected data; the nature of the response; and any changes made to mitigate future risk.

4. Authority to Enforce

The Board authorizes the CEO to take necessary actions, including personnel decisions and provider contract actions, to ensure compliance with these policies and the procedures established under them.

5. Review Cycle

This policy will be reviewed and updated at least annually or sooner if federal or state law, FDLE/FBI processes, or operational requirements change.

Board Secretary's Signature: _____

(In the event the Board Secretary is not present, the Board Chair may sign and authority shall pass down accordingly.)

Print Name and Title: Meredith Frisch

Date: 4/22/26