



NOTICE OF EDUCATIONAL PRIVACY PRACTICES

THIS NOTICE DESCRIBES HOW EDUCATIONAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.

This notice describes how we may use and disclose your educational information to carry out services, payment or educational operations and for other purposes that are permitted or required by law. It also describes your rights to access and control your educational information in some cases. Your "educational information" means any of your written and oral education information, including demographic data that can be used to identify you. This is educational information that is created or received by your early childcare education provider, and that relates to your past, present or future education records.

I. Uses and Disclosures of Educational Information – Starfish Family Services (SFS) may use your educational information for purposes of providing services, obtaining payment for services, and conducting health care operations. Your educational information may be used or disclosed only for these purposes unless SFS has obtained your authorization or the use or disclosure is otherwise permitted by law without your authorization. Disclosures of your educational information for the purposes described in this Notice may be made in writing, orally, electronically, or by facsimile.

A. Services. We will use and disclose your educational information to provide, coordinate, or manage your education services and any related services. For example, we may disclose your educational information among our teachers, family service guides, education/curriculum specialists, family engagement specialists, and other staff, who work for Starfish Family Services.

B. Payment. Your educational information will be used, as needed, to obtain payment for the services that we provide. We may disclose educational information to our funding sources, including but not limited to the Office of Head Start.

C. Operations. We may need to use and disclose your educational information for our business operations, as necessary to run our organization and make sure that our consumers are provided quality care. Service operations include such activities as:

- Quality assessment and improvement activities.
- Employee review activities.
- Training programs including those in which interns in education learn under supervision.
- Accreditation, certification, licensing or credentialing activities.
- Review and auditing, including compliance reviews, medical reviews, legal services and maintaining compliance programs.
- Business management and general administrative activities.

D. Other Uses and Disclosures. As part of services, payment and educational operations, we may also use or disclose your educational information for the following purposes:

- To remind you of an event.
- To inform you of potential educational options or alternatives.
- To inform you of education, health-related benefits or services that may be of interest to you.
- To contact you to raise funds for SFS or an institutional foundation related to SFS. If you do not wish to be contacted regarding fundraising, please contact our Privacy Officer.

II. Uses and Disclosures Beyond Services, Payment, and Education Operations Permitted Without Authorization of Opportunity to Object – We will release information when we are required to do so by law. Examples of such releases would be for law enforcement or national security purposes, subpoenas or other court orders, communicable disease reporting, disaster relief, review of our activities by government agencies, to avert serious threat to health or safety or in other kinds or emergencies.

You may object to these disclosures. If you do not object to these disclosures or we can infer from the circumstances that you do not object or we determine, in the exercise of our professional judgment, that it is in your best interests for us to make disclosure of information that is directly relevant to the person's involvement with your care, we may disclose your educational information as described.

III. Uses and Disclosures Which You Authorize – If you give us permission in writing, we may use your personal information. If you give us your permission, you have the right to revoke it. This must be in writing, too. We cannot take back any uses or disclosures already made with your permission.

Other than as stated above, we will not disclose your educational information other than with your written authorization. You may revoke your authorization in writing at any time except to the extent that we have made disclosures with your prior permission.

IV. Your Rights – You have the following rights regarding your education record:

A. The right to inspect and copy your education record. In most cases, you have the right to inspect and obtain a copy of your records.

To inspect and copy your education record, you must submit a written request to the Privacy Officer whose contact information is listed on the last page of this Notice. If you request a copy of your information, we may charge you a fee for the costs of copying, mailing or other costs incurred by us in complying with your request.

B. The right to have your teacher/family service guide amend your educational information – You may request an amendment of educational information about you in a designated record set for as long as we maintain this information. In certain cases, we may deny your request for an amendment, but we must give you a written reason for our denial.

C. The right to obtain a paper copy of this notice – You have the right to receive an additional copy of this notice at any time. Even if you have agreed to receive this notice electronically, you are still entitled to a paper copy of this notice. Please call or write to us to request a copy.

- V. Our Duties** – SFS is required by law to maintain the privacy of your personally identifiable information and to provide you with this Notice of our duties and privacy practices. SFS is required to abide by the terms of the notice currently in effect. We reserve the right to change the terms of this Notice and to make the new Notice provisions effective for all educational information that we maintain. Any changes to our notice will be published on our web site. To obtain a copy of our current Notice, you can go to www.starfishfamilyservices.org, call us at (734) 728-3400, or write to us and request a copy be sent to you in the mail. You may also request a copy of our Notice by asking for one anytime you are at our offices.
- VI. Complaints** – If you believe your privacy rights have been violated, you may file a complaint with us or with the U.S. Department of Education, Family Policy Compliance. For more information, see <https://www2.ed.gov/policy/gen/guid/fpco/index.html>. You will not be penalized for filing a complaint with the federal government.

For inquiries or questions regarding the use or disclosure of your educational information or to file a complaint with SFS, contact our Privacy Officer.

Starfish Family Services
Privacy Officer
30000 Hiveley Rd.
Inkster, MI 48141
Or call (734) 728-3400
E-mail: compliance@sfish.org

All complaints must be submitted in writing. Our Privacy Officer will assist you with writing your complaint, if you request such assistance.

You will not be penalized for filing a complaint.

This notice is informed by the Family Education Rights and Privacy Act (FERPA) of 1974.

This privacy notice is effective July 12, 2019