

FaDSS Policy 7.0 – Technology

Policy Statement

It is the policy of the FaDSS program that technology be used within the guidelines of this policy and the FaDSS Code of Ethics and in accordance with all applicable laws. This policy is intended to establish minimum standards for the use of technology within the FaDSS program. Grantee agencies may establish stricter policies.

This policy applies to all FaDSS grantees their immediate FaDSS workers, and anyone with access to family records including agency volunteers and interns.

Technology expands the ability of grantees to assist families by providing services using online platforms, telephone, videoconferencing, electronic social networks, automated tutorials, e-mail, text messages and a host of other services. Additionally, FaDSS uses technology to access, gather, and otherwise manage information about families. This policy addresses three critical areas:

1. Providing information to the public
2. Using technology in the provision of FaDSS services
3. Gathering, managing, storing, and accessing family information

1. Providing Information to the Public

Grantees who use technology to provide information to the public about FaDSS services must take reasonable steps to:

- Ensure that the information is appropriate, consistent, respectful, and accessible.
- Ensure that information disseminated is accurate and valid, which includes periodic review.
- Ensure that all confidential information is protected.

Grantees must ensure that minimum Web Content Accessibility Guidelines ([WCAG 2.0](#)) are met.

All information shared from a third party must be vetted by grantees to ensure it is accurate and from a trusted source.

2. Using Technology in the Provision of FaDSS Services

For the provision of FaDSS services, grantees must only use technology on work-issued devices and should not access family information nor communicate with families on personal devices. For example, calls to families should not be made on personal cell phones. Electronic devices and technology should only be used for work purposes and not personal use.

Grantees must ensure all of the following are maintained when using technology in the provision of FaDSS services:

- **Informed Consent.**
 - FaDSS services must be provided in the format preferred by the family, in accordance with program standards. Grantees must inform families of the risks and benefits to using

technology in the provision of FaDSS services. Risks and benefits should be reviewed with every family enrolled in the program.

- **Assessing Family Relationship with Technology.**
 - This includes individuals' familiarity and comfort with technology, access to the internet, language access, and the use of technology to meet the needs of diverse populations, including individuals with disabilities.
- **Competence, Knowledge and Skills of Staff.**
 - Grantees must ensure that staff are competent in the use of technology and maintain competency through relevant training, consultation and supervision. This includes ensuring competence of staff regarding families' cultural community and linguistic, social, and economic environment to attend to families' unique needs and challenges.
- **Confidentiality.**
 - Grantees who provide electronic services should develop agency protocols and policies to protect family confidentiality. Grantees should use encryption software and firewalls and periodically assess confidentiality policies and procedures to ensure compliance with all applicable laws and program and ethical standards.
- **Maintaining Professional Boundaries.**
 - Grantees must ensure clear distinction between professional and personal communications and must take reasonable steps to prevent family access to staff members' personal social networking sites in order to avoid boundary confusion and inappropriate dual relationships.
 - Workers have a right to have a personal online presence; however, they should be aware of how their personal communications could affect their professional relationships.
 - Grantees must be aware and cautious of shared "friends", interest groups or connections on web platforms. Such indirect and unintended overlap may create boundary confusion and inappropriate dual relationships.
- **Unplanned Interruption of Electronic Services.**
 - Electronic services can be interrupted unexpectedly in a variety of ways. Grantees must develop policies on how to manage technology failures and discuss them with families at the beginning of their relationship.
- **Social Media**
 - Grantees may create agency-managed social media accounts to communicate general information to the public about the FaDSS program and related events.
 - Social media accounts may not be used for direct communication between grantees and current or former families unless pre-approval is obtained from DCAA. If approval is granted, all communication with families through the use of social media becomes part of the families' record and must be maintained and documented in accordance with program policies and procedures.

3. Gathering, Managing, Storing, and Accessing Family Information.

Grantees must ensure that all family information, including documentation of services and contacts with Families both virtually and in-person is maintained securely and confidentially. Grantees are responsible for developing agency policies regarding gathering, maintaining and accessing family information in accordance with the following:

- **Informed Consent.**
 - Grantees should explain to families whether and how they intend to use electronic devices or communication technologies to gather, manage and store family information.
- **Electronic Searches.**
 - Except for compelling reasons, Grantees should not utilize search engines to gather information about a family without the family's consent.
 - Exceptions to seeking family consent to gather information online may arise in emergency situations, for example, when a family member poses a serious, imminent risk to self or others and the only way to identify where the family is would be to search for information online.
- **Documentation**
 - Grantees must ensure responsible documentation of all contacts and records of services provided to FaDSS families including appropriate training and supervision.
- **Electronic Records Retention.**
 - In accordance with 28 CFR Part 66, grantees must maintain family records for 5 years after the date of exit from the program. This includes paper and electronic records and files.
 - Grantees should develop policies for managing phased out and outdated devices and accounts from the program in accordance with confidentiality and records retention requirements.
- **Family Access to Records.**
 - Grantees must ensure that families access to electronic records is provided in a manner that takes family confidentiality, privacy and the family's best interests into account.
 - Families have the right to access their records and may request to review them in the agency office under the supervision of the Grantee.
- **Protecting Family Records**
 - Grantees must ensure that family records are kept secure and confidential. If family records are compromised, grantee agencies must develop protocol for notifying families. This includes protocol for contacting families no longer enrolled in the program.
 - Any record that is compromised must be reported to DCAA. This includes information that is hacked, cloud storage breaches, and other data security failures.