

Data System Disruptions: Preparation and Response Considerations for Part C and Part B 619 Leaders



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Part C and Part B 619 programs rely on their data systems* to support everyday operations. Disruptions to a state's data system may jeopardize access to accurate information. This resource is intended to help Part C and Part B 619 leaders understand, prepare for, and respond to various types of data system disruptions.

*The term "data system" refers to the technical data applications, policies, and procedures that enable programs to collect, analyze, report, and use data.

What is a data system disruption?

A data system disruption is any event or circumstance that limits or restricts a data system from being accessed or used as planned.

What might cause a data system disruption?

A variety of events or circumstances may cause a data system disruption. Disruptions may or may not be avoidable. Programs may or may not be warned about them. Examples of events that might cause a disruption include:

- natural disaster (e.g., hurricane, earthquake, wildfire, flood);
- local, regional, or state power outage;
- public health crisis;¹
- localized physical damage to a program office (e.g., structural problem, flood, fire);
- unsuccessful or delayed deployment of a new data application or data application enhancement;
- change in reporting requirements (e.g., new data to be collected to meet new requirement);
- planned or unplanned departure of key data staff (e.g., local, state, program, IT staff); and
- external technical disruption (e.g., malicious attempt to access a data application² [ransomware, malware, bot attack, etc.], unplanned server disruption).

What impact can a disruption have on a Part C or Part B 619 data system?

Disruptions may have an isolated or large-scale impact on a program's data system. The negative consequences of a disruption may be easy to address or require long-term intervention. Here are some potential scenarios of how a disruption could impact a Part C and Part B 619 data system:

- There is damage from an event that causes partial or complete loss of technical equipment, paper-based child records, or other program documentation.
- Users have limited access to a data application (e.g., power outage, system offline longer than expected for an update) and cannot enter or retrieve data.

- Reporting deadlines or completeness requirements are negatively impacted due to missing data because a disruption prevented providers from reaching children and families for service delivery.
- Necessary changes to a data application cannot be made because the program does not have the resources (e.g., time, money, skilled people) needed to make them, putting the program out of compliance with reporting requirements.

What is data system disruption preparedness?

Preparedness refers to proactively developing a set of actions that Part C and Part B 619 programs can take to avoid or minimize potential adversity when faced with a data system disruption. The actions can include physical, policy, procedural, and training preparations. Some steps can be taken before a disruption while others can be taken once a disruption has occurred, but both sets of steps can be developed in advance of a disruption. Having plans in place for what to do before and after disruptions occur can help mitigate negative consequences.

Data system disruption preparedness actions can be categorized into three areas: users, processes, and technology. *Users* need to be prepared for a disruption by receiving the necessary training and communications. *Processes* need to be established and documented so that users know what to do when a disruption occurs. *Technology* needs to be designed to make necessary changes and minimize consequences associated with a disruption.



What steps can be taken in advance of a data system disruption?

- Design data systems that allow for some local and state user functionality when the internet is not available.
- Encourage digital records instead of paper records and provide frequent backups (e.g., every 4 working hours) to external/off-site locations.
- Develop and distribute a set of case record-level templates/forms for alternative local data entry of essential case management information.
- Document the circumstances under which the state will support local programs with data entry after a disruptive event (e.g., if a natural disaster takes data application offline for more than X amount of time, but paper records are still available, then state staff will provide X hours of data entry support to local programs when the system is returned online).
- Establish processes for scheduled data application updates and emergency updates (e.g., standard advance notice given to local programs).
- Establish and use multiple methods of advance communication about planned downtime of a data application (e.g., splash page, FAQ, webinar about upcoming application enhancement).
- Stay informed about data changes that OSEP is considering (e.g., respond to calls for input, attend national TA calls, engage with colleagues in like roles in other states).
- Maintain regular communication with local programs that use their own data applications regarding upcoming changes to state data requirements.
- Explain to IT staff/vendor about the consequences associated with not being able to comply with state and federal reporting requirements so that when changes or disruptions occur, they know your program and data system are a priority.
- Ensure vendor contracts include flexible support during the operation and maintenance period so limited necessary changes can be made by vendors (or state staff) to data entry forms, reports, etc.

What steps can be taken once a disruption has occurred?

- Issue timely and ongoing communications to local programs regarding the nature of the disruption and its known impact, including initial information about the event/circumstance, and time/date estimates for restoration.
- Help local programs plan for catching up on data entry, including adjusting timelines for required submissions (e.g., invoices from contractors).
- Coordinate and support local programs in conducting all required meetings and planned service delivery to the greatest extent possible and in a timely manner, even if actual data entry for those meetings and services may be delayed until the data application is available again.
- Ask local programs to submit written details to the state describing specifically how the disruption has impacted them (useful when a disruption triggers the need for a descriptive APR data note).

Conclusion

Data system disruptions happen. Advanced preparation can minimize the consequences and impact associated with them, in turn minimizing (at least some of) the stress placed on Part C and Part B 619 leaders when they occur. This resource was developed to offer general considerations for what leaders can do before, during, and after a data system disruption. Different types of disruptions will have different considerations and each state will have unique circumstances to consider when planning for and

addressing a disruption. DaSy technical assistance providers are available to support states' work to prepare for and address Part C and Part B 619 data system disruptions.

Related Resources

- ¹DaSy's collection of COVID-19 resources available at <https://dasycenter.org/tag/covid-19/>
- ²Privacy Technical Assistance Center's resources on cybersecurity available at <https://studentprivacy.ed.gov/>
- Center to Improve Program and Project Performance. (July 2021). *Evaluation during disruptions: Course corrections and other considerations*. Available at <https://osepideasthatwork.org/sites/default/files/CIPP-Evaluation-During-Disruptions-Report-Full.pdf>

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