STUDENT DATA PRIVACY COMPLIANCE DISTRICT CHECKLIST

□ Start With the Why

Districts collect enormous amounts of student data that is shared with third-party vendors in order to streamline and support teaching and learning. The liability to protect this data is on the district, not the vendor. Building a review and compliance process is essential to protect students.

□ Create Working Group or Committee

Identify the positions that should be involved in reviewing new and existing vendor resources. Include technology, purchasing, education technology, instructional coaches, site administrators, and more. Collaborate together on a RACI matrix to clarify goals and expectations for each role.

□ Review State and Federal Laws

Collectively build a basic understanding of the requirements of laws such as COPPA, CIPA, SOPIPA, etc. California law requires vendor contracts to state clearly and explicitly what student data is collected, how it is used, stored, and accessed. Review Exhibit B of the National Data Privacy Agreement (NDPA).

□ Build a Project Plan

Consider prioritizing the privacy compliance plan given the liability your district could incur. Think about how some of the recommended steps can be incorporated into existing meetings and work processes.

□ Design a Process Resource Review and Approval

What is the process if a teacher or staff member wants to use a new app or electronic tool? How will the request for review be made? Who or which team will review the requests to ensure the vendor is compliant? What are the criteria for approval?

□ Test and Refine the Process

Apply the newly developed process to existing resources within the district by gathering an inventory of applications being used. Use the working group to engage in a model of continuous improvement.

□ Adopt Board Policies and Administrative Regulations

Discuss, develop, and adopt board policy and administrative regulations that incorporate the new review process. Ensure the board has adopted the California NDPA, which allows for contract sharing between districts. Sample board policies in CSBA's GAMUT include:

BP/AR 5022 – Student and Family Privacy Rights

BP/AR 5125 – Student Records

BP/AR/E 5125.1 – Release of Directory Information

BP 1340 – Access to District Records

BP 5145.13 – Response to Immigration Enforcement

□ Communicate the New Process with Staff and Sites

Use the resources available at www.cite.org/CCEEStudentDataPrivacy to create a communication and implementation plan for use. Additional resources are available at www.studentdataprivacy.net. These resources were developed to ease the process by allowing districts to share information while remaining transparent with stakeholders.

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STUDENT DATA PRIVACY

WHOSE ROLE IS IT?

Just like all student-centered initiatives, we all have a role to play in protecting student data

Students

- Understand and be aware of the data you share
- Be a responsible user of technology
- Practice Digital Citizenship

Families

- Understand and be aware of data being collected by apps and how used
- Discuss, practice, and model responsible technology user practices with students

Site Staff

- Implement district app review and approval process
- Create a team to discuss potential apps
- Communicate and educate families and community stakeholders

Teachers

- Teach students digital safety and awareness
- Check new and existing curriculum and online instructional tools for alignment with privacy practices
- Use the app request process for your site and district

District Staff

- Assist in the development of an app or resources review and approval process for your district
- Work with a team to vet, deploy, and train users on applications
- Educate all stakeholders on how to be responsible users of technology
- Communicate the what and why behind student data privacy

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