District Level Privacy By Design

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Introductions

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What’s needed is a connected, secure, and effective learning ecosystem.
Cambridge Public Schools (CPS) is a school district located in Cambridge, Massachusetts. The district enrolls approximately 6,750 students in grades kindergarten through high school. The district has twelve elementary schools, four Upper Schools (grades six to eight) and one comprehensive high school (Cambridge Rindge and Latin School), which includes a career and technical education program (Rindge School of Technical Arts) and alternative option (High School Extension Program).
Cambridge’s Vision for Privacy by Design

Cambridge Public Schools’ Vision
Cambridge Public Schools is widely recognized as an institution of excellence. Our schools deliver an inclusive, safe, high-quality learning experience that cultivates every student’s potential, works to dismantle educational inequities, and strengthens family and community partnerships. Our students are critical thinkers, lifelong learners, and builders of a more equitable society who graduate prepared to make informed choices about their future.

Why Student Data Privacy Matters
In today’s world of advancing online resources teachers, students, and parents are benefiting from an ever increasing wealth of tools to support teaching and learning. The growth in these tools is extraordinary with great potential to improve student outcomes. Along with this explosion in growth of online learning tools, comes the inherent risks of leakage of student data and understandable concerns over student privacy.
Complexities and Issues

Student Data needs to be shared

Everyone wants it!

How do we protect it?
Privacy in Depth

SIS: The foundation of privacy

- Access based on legitimate educational interest as defined by the district
- Least possible access
- Secure data exchanges
Rostering

**Classlink**
- Secured Single Sign-on
- Utilizes OneRoster
- Personalized Dashboard

**MA Data Hub**
- Privacy Enforcement
- Leverages State Reporting data
- Privacy reports for parents
Leverages State Reporting | Privacy Enforcement, “Privacy over the Wire”
Building Blocks of the System

- Educational Applications need to be vetted

CPS Procedures and App Vetting Workflow

1. See if the resource is already approved. Check the list >>

2. Not on the list? Perform a self-assessment of the application to ensure it is educationally-aligned.

3. Educationally-aligned? If yes, submit a Resource Request Form

4. Check your inbox. You will receive email notifications from the ICTS department of any progress along the way.
SDPC Resources
Customized Resource Listing page provides transparency and awareness of what is in use and not in use at CPS.

Managed Methods
Protects Google environment, synced with SDPC
CPS Guide to Personal Data

The CPS guide to personal data provides information on what personal information is collected at the Cambridge Public Schools, and how it is used and shared. To get started, click on an audience below.

Data Transparency Project

Academic Data

IGTS maintains Apon, a student information system that securely stores all student academic data.

What Academic Data We May Collect

Examples of data we may collect:

- Class Data
  - Enrollment
  - Grades
  - Assessments
  - Transcript/Class Data
  - PreK-Kindergarten data
  - Learning data

How We Collect Academic Data

Examples of how we may collect data:

- From Teachers via multiple collection mechanisms
- From School & State Assessment Systems
- From Educational Technology Applications
- From Federal Financial Aid

How Do We Use/Who We Share Academic Data With

Examples of how we may use this data:

- Measuring & reporting on student learning
- Determining interventions
- Measuring effectiveness of programming
- Improving instruction

Examples of who we may share this data with:

- With educators who are directly responsible for the student's instruction
- With the MA Department of Elementary & Secondary Education
- With other schools to whom a student is transferring
- Contractors/School Providers designated as School Officials
Other Data Requests

Attempt to operationalize secure data exchange processes to address:

- Research requests
- Ad Hoc reports
- Family provided data
- Community Partner data sharing (example)
**Goal:** Systematize the process to share data between the district and out-of-school time providers.

Evolution of the Community Partners Portal

- Created database of organizations and programs
- Developed database-driven website with connection to Aspen
- Incorporated automated Community Partners Parent Consent for student data
- Provided training to all stakeholders
Authorization to Release Student Data to CPS Community Partner Programs

Student Profile Components:

- Name (No Consent)
- School (No Consent)
- Grade (No Consent)
- Student Email
- Parent / Emergency Contact Information
- Home Language
- Transcript of OST Programs and Other OST Activities (including dates of participation)
  - Community Partners Portal
  - CPS Athletics Portal
  - CPS Activities Portal
  - DHSP OST data in TRAX
  - Historical info housed in Aspen
Families Select an Option Annually:

**AUTHORIZATION TO RELEASE STUDENT DATA TO CPS COMMUNITY PARTNER PROGRAMS**

**Select an option below:**

**OPTION 1**
Complete release for All CPS Community Partners
Recommended
Select

**OPTION 2**
Complete release for Cambridge Public Schools only
More Restrictive
Select
Option 1

Recommended

Allows data release to all active CPS partners

Full live listing of active CPS partners

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**Authorization to Release Student Data to CPS Community Partner Programs**

I authorize the Cambridge Public Schools (CPS) to release the following student record data about my child to the CPS Community Partner Programs in which my child is participating for the current school year:

- Name
- School
- Grade
- Student email
- Current and past participation in:
  - CPS Athletics
  - Other Community Partners
  - Department of Human Services Programs
- Each record of participation would include some or all of:
  - Name of the program, organization, and/or sport
  - Dates when the student began and finished
  - Frequency (meetings/meet)

The CPS Community Partner Programs in which my child may participate in for the current school year may include but are not limited to:

<table>
<thead>
<tr>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Apostolic) Baldwin Community</td>
</tr>
<tr>
<td>Breakthrough Gravier Boston</td>
</tr>
<tr>
<td>Buckingham Browne &amp; Nichols</td>
</tr>
<tr>
<td>Cambridge Community Center</td>
</tr>
<tr>
<td>Cambridge Housing Authority</td>
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<tr>
<td>Cambridge Math Circle</td>
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<tr>
<td>Cambridge School Volunteers</td>
</tr>
<tr>
<td>Cambridge Youth Council</td>
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<tr>
<td>City of Cambridge</td>
</tr>
</tbody>
</table>

Showing 1 to 10 of 23 entries

I also authorize the CPS Community Partner Program in which my child participates in during the current school year to receive this student record data pertaining to my child.

I also authorize staff from both CPS and the CPS Community Partner Programs my child participates in during the current school year to speak to each other regarding my child, the student record data identified above and my child's participation in these CPS Community Partner Programs.

By entering into this Authorization to Release Student Data to CPS Community Partner Programs and granting permission as stated herein, I am releasing the City of Cambridge and the Cambridge Public Schools and their respective officers, directors, agents, members and/or employees from and against any and all claims arising out of or related to the release of my child's student record data to the CPS Community Partner Programs that my child participated in during the current school year and any subsequent use of this information by the designated recipient and their respective officers, directors, agents, members and/or employees.
AUTHORIZATION TO RELEASE STUDENT DATA TO CPS COMMUNITY PARTNER PROGRAMS

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  - Name of the program, organization, and/or sport
  - Dates when the student began and finished
  - Frequency (meetings/meets)

The CPS Community Partner Programs in which my child may participate in for the current school year includes Cambridge Public Schools.

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The electronic signature mechanism that is available to use for these forms is data verification and form CAPTCHA. Electronic signatures shall be considered as valid and binding as original signatures. Signatures, originally signed by hand, but transmitted via email or fax shall also be deemed valid and binding original signatures.

Do you consent to allow Cambridge Public Schools to share your child’s data with Cambridge Public Schools?

- [ ] Yes, I agree
- [ ] No, I don’t agree
If a Data Sharing Consent form was not completed by the parent then, a provider can request to have the document signed at a later time through the portal.

Signed Data Sharing Consent = Ability to share complete student profile with providers/partners

Email Parent Request to Sign Data Sharing Consent
Privacy & Interoperability Symposium

District / LEA

State Agencies

Connected and Secure Effective Learning Ecosystem ™

Parents / Caregivers

Vendors / Providers

Privacy Enforcement
Greater Marketplace Presence
Statewide Implementation
Standard Agnostic Exchange
CEDS DW, Generate & EdFacts
Validation & State Reporting
Student Data Privacy Transparency
Learning Application Usage
Student Record Access
Civil Rights Reporting (CRDC)
Data Exchange, Rostering, Etc.
Data Synchronization
Data Asset Management

Access 4 Learning Community
Simple, Secure, Scalable, Standard.