A4L Updates

Rapid fire!

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Alex Jackl
Bardic Systems

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Ramah Hawley
The Education Cooperative (TEC)

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RAPID-FIRE Agenda

- SIF Data Model Specification
- SIF Infrastructure Specification
- Privacy Obligation Documents (PODs)
- SDPC Resource Registry
- National Data Privacy Agreement (NDPA)
- Global Education Security Standards (GESS)
SIF Data Model Specification

Alex Jackl, Bardic Systems
John Lovell, A4L Community
A series of meetings began in July 1998 between Microsoft Corporation in partnership with 18 other companies on the topic of interoperability between education applications. The conclusion of these meetings identified that the best solution was for interested parties to collectively define standards that all software vendors could adopt.

Common understanding of data objects allows for data to be synchronized through queries and “real time” events.
SIF Data Model Specification

Unity Data Model Summary of Changes
SIF Data Model Implementation Specification (NA) 4.3

Updated: September 2, 2022

Release Location:
http://specification.sifassociation.org/Implementation/NA/4.3/

Modern Grade Pass Back (White Paper):
https://data.a4l.org/resources/#Use-Cases

V 4.2 Scope:
1. Grade Passback
2. Standards Based Grading
3. EDFacts Reporting
4. State Requests
SIF Infrastructure Specification

Alex Jackl, Bardic Systems
John Lovell, A4L Community
SIF Infrastructure Specification

When SIF was envisioned Microsoft’s middleware was new and no web services standards existed.

Today we leverage REST and further specify how to use it. I doing this we SIF is approachable, compatible, and capable.
Data Hubs: The leading Architecture

Pros

- No Application need be a Service Provider
- One source of truth for all queries
- Queries that span multiple Applications’ data can be answered

Cons

- Query results are only as up to date as the data sent to the ODS by its Service Consumers
Privacy Obligation Documents (PODs)

Mike Reynolds, CedarLabs
**Privacy Obligation Documents (PODs)**

**POD** (Privacy Obligations Document) is a standards agnostic machine readable document that contains all data privacy requirements including contract clauses, privacy obligations, technical control benchmarks, and other control metadata.

- Every POD is **unique** to the relationship between:
  - District
  - Vendor
  - Application
  - Place in time

- Every POD is assigned a unique **POD-ID**:
  - Any change to a POD (added clause, date change, etc.) will create a new POD and new POD-ID

- POD-IDs can be used to convey obligations within PODs without having to exchange the entire POD.
Creating a POD

GEPS Manager in the SDPC Registry

Maps DPA to data elements (Done for every DPA)

- Standard NDPA done Nationally
- State DPA Exhibit G Clauses
- Unique Exhibit H Clauses

DPA = Data Privacy Agreement
NDPA - National Data Privacy Agreement
GEPS = Global Education Privacy Standard
SDPC = Student Data Privacy Agreement
Exhibit G = Supplemental State Terms
Exhibit H = District/Vendor Specific Edits
A4L Support for PODS

- SIF 3 Infrastructure was extended to support
  - POD Sharing and Administration
  - Basic Gatekeeping
  - (Limited) Enforcement Potential
- Blueprints for retrofitting legacy (CSV/SFTP) workflows with minimal disruptions
**Ongoing activity on PODs**

- **Mapping to CEDS**

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<th>Description</th>
<th>AL (SH) Specifications</th>
<th>GDPR Principle</th>
<th>GDPR note</th>
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- **Vendor Engagement**
SDPC Resource Registry

Ramah Hawley, The Education Cooperative (TEC)
Remarkable Journey of the SDPC Resource Registry


- Developed for a single district - Cambridge Public Schools
  - Offered to other Massachusetts school districts
    - Early adopters - California and Texas
Remarkable Journey of the SDPC Resource Registry

Expanding Reach

- Adoption by school districts, educational agencies, and vendors
- SDPC Resource Registry's growing influence
- Facilitating compliance with student data privacy laws
- Empowering educators to make informed decisions
SDPC Resource Registry

Remarkable Journey of the SDPC Resource Registry

Continuous Improvement

- Ongoing updates and enhancements
- Adapting to changing privacy regulations and technology
SDPC Resource Registry

Nationwide SDPC Stats Today

- Countries Participating: 4
- Alliances: 26
- States With Participating Districts: 31
- School Districts Participating: 12,205
- Providers Participating: 46
- Resources: 9,643
SDPC Resource Registry
SDPC Resource Registry

Manage Agreements:
This is the area of SDPC’s Resource Registry that houses all of a district’s requests and agreements (active and inactive).
SDPC Resource Registry

Publicly viewable side shared via a URL on the district’s website.
SDPC Resource Registry

Features

Alliance and/or Nationwide Searches by:

- Company Name
- Resource Name
- Grade Level & Content Area
- School District
- State

- Manage Agreements
- Add New Requests
- Add New Resources
- Manage DPA Renewals
- Auto Exhibit E Creator
- Manage Accounts
- Manage Users
- Much more…
National Data Privacy Agreement (NDPA)

Steve Smith,
Cambridge Public Schools
Brief history - How A4L came to be focused on NDPA

- Originally all Alliances encouraged to develop their own DPAs
- Over time the DPAs organically began to look very similar
- Designated the “Common” Clauses
- 2018/19 created the first NDPA working group
National Data Privacy Agreement (NDPA)

- Further increase consistency across Alliance DPAs
- Standardize the DPA Format so it looks the same across Alliances
- Ease logistics of implementing
- Identify common legal requirements across jurisdictions
- Provide mechanism to add other jurisdiction specific requirements
- Standardize terminology & definitions across jurisdictions
- Greater impact on, and buy in, from the vendors = Adoption
## National Data Privacy Agreement (NDPA)

<table>
<thead>
<tr>
<th>NDPA Feature</th>
<th>Description</th>
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<tr>
<td>Section</td>
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<td>Section</td>
<td>Page 3 - Signatories</td>
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<td>Section</td>
<td>Standard Clauses</td>
</tr>
<tr>
<td>Section</td>
<td>Exhibits</td>
</tr>
<tr>
<td></td>
<td>A = Descriptions of Services</td>
</tr>
<tr>
<td></td>
<td>B = Schedule of Data</td>
</tr>
<tr>
<td></td>
<td>C = Definitions</td>
</tr>
<tr>
<td></td>
<td>D = Directive for Disposition of Data</td>
</tr>
<tr>
<td></td>
<td>E = General Offer of Terms</td>
</tr>
<tr>
<td></td>
<td>F = Data Security Requirements</td>
</tr>
<tr>
<td></td>
<td>G = Supplemental State Terms</td>
</tr>
<tr>
<td></td>
<td>H = Additional Terms or Modifications</td>
</tr>
</tbody>
</table>

This National Data Privacy Agreement (NDPA) is entered into on [Date] and is entered into by and between:

- [School District Name], located at [Street, City, State] (the “Local Education Agency” or “LEA”) and
- [Provider Name], located at [Street, City, State] (the “Provider”).

WHEREAS, the Provider is providing educational or digital services to LEA.

WHEREAS, the Provider and LEA recognize the need to protect personally identifiable student information and other regulated data exchanged between them as required by applicable laws and regulations, such as the Family Educational Rights and Privacy Act (“FERPA”) at 20 U.S.C. § 1232g (34 CFR Part 99); the Children’s Online Privacy Protection Act (“COPPA”) at 15 U.S.C. § 6501-6506 (16 CFR Part 312), applicable state privacy laws and regulations and

WHEREAS, the Provider and LEA desire to enter into this DPA for the purpose of establishing their respective obligations and duties in order to comply with applicable laws and regulations.

NOW THEREFORE, for good and valuable consideration, LEA and Provider agree as follows:

1. A description of the Services to be provided, the categories of Student Data that may be provided by LEA to Provider, and other information specific to this DPA are contained in the Standard Clauses hereto.

2. Special Provisions. Check if Required
   - If checked, the Supplemental State Terms and attached hereto as Exhibit “G” are hereby incorporated by reference into this DPA in their entirety.
   - If checked, LEA and Provider agree to the additional terms or modifications set forth in Exhibit “H” (Optional).
   - If checked, the Provider, has signed Exhibit “E” to the Standard Clauses, otherwise known as General Offer of Privacy Terms.
The **National Data Privacy Agreement (NDPA)** has been community developed and designed to streamline application contracting and set common expectations between schools/districts and marketplace providers.

After a great amount of Community growth and feedback, schools, districts, divisions and states indicated they needed their own state-specific version of the DPA for larger adoption.

Two years later, there was enough commonality between state specific DPAs that a National DPA Project Team explored the viability of developing a draft that could be used by any school/district/division across the US. The NDPA has been developed with extensive review and comments from all stakeholders and is designed to address common student data privacy concerns and streamline the contracting processes for users with limited legal or fiscal resources for “one off” contracts with each of the over 13,000 US school districts.

To find out more and get your needs addressed, please join in the conversations by being part of the Consortium.

**View the National Data Privacy Agreement (NDPA)**

**View NDPA Usage Guidelines (PDF)**
National Data Privacy Agreement (NDPA)

Evolution or latest updates to this work

- Today A4L is in one year into the process to develop the NDPA V2
- Improved flow of the DPA
- Improved clauses to incorporate common edits from V1
- Overall a cleaner DPA with each revision
- Not an easy process
Global Education Security Standards (GESS)

Steve Smith,
Cambridge Public Schools
Global Education Security Standards (GESS)

Privacy vs. Security
Who's job is it anyway?

Security
Walls of your home
- Hardware
- Software
- Access rights
- Encryption methods
- Infrastructure
- Best practices

Everyone plays a role in keeping student data safe, no matter how little technical experience they have.
Ensure the safety of student data by developing a system and properly educate and train staff.

Privacy
Keys to your home
- Policies
- Procedures
- Laws/Guidance
- Behavioral
- Best practices

Security & Privacy together help to keep everything safe!

Picture courtesy of CITE.org
Global Education Security Standards (GESS)

- No standard Requirement
- “Industry Standards”
- “Best Practices”
- Some Jurisdictions have mandated control sets; NH, NY, IL, TX AU NZ
- Most do not
- Everyone is struggling consumers & providers
Global Education Security Standards (GESS)

Where to start on a Global Education Security Standard?

- ST4S Introduction
- Leverage the work of ST4S
- Mapping ST4S and all relevant frameworks
- Identify specific controls across frameworks
- Format & publish new set of controls
Global Education Security Standards (GESS)
Global Education Security Standards (GESS)

Global Education Security Standard (GESS) is a matrix/crosswalk of all existing security frameworks along with the core set of controls applicable to PK-20 data.

About GESS
- GESS is an internationally agreed upon set of security controls pulled from major cyber security frameworks that are most applicable to the PK20 education ecosystem.
- By joining the GESS subscriber you will be aiding the movement of the EdTech industry towards one common set of security controls to apply across many jurisdictions, thus avoiding the need to prove certification in multiple frameworks. PK20 schools and districts are adopting the GESS set of controls as the expected security measures to be in place to protect all student data.
- In the US the next version of the National Data Privacy Agreement will include the GESS as an approved and accepted control framework in New Australia & New Zealand the prevailing ST4S controls are embedded within GESS.
- GESS will streamline both the providers’ ability to implement required security controls while at the same time meeting school expectations all with one common set of controls.

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Questions
How is a POD generated? (continued…)

Welcome to the GEPS Custom POD Wizard. To get started creating a custom POD, please complete the following steps.

SELECT a State

SELECT One

Your Custom PODs

There are no custom PODS.

Get Started! Name this Custom POD

Enter a Name

Continue >>
How is a POD generated? (continued…)

SELECT an agreement type

National Agreement

Your Custom POD, test includes: National Clause Set

I am finished creating this POD. View Custom POD >>

(+) ADD State Specific Exhibit G Groupings

(+) ADD Exhibit H Groupings

There are no Exhibit Hs available.
How is a POD generated? (continued…)

Your Custom POD, Test Includes: National Clause Set + MA Obligations V1.0 (Exhibit G)

I am finished creating this POD. View Custom POD >>

(+) ADD State Specific Exhibit G Groupings

Add

(+) ADD Exhibit H Groupings

There are no Exhibit Hs available.

(-) DELETE additional grouped clauses

Name

MA Obligations V1.0 (Exhibit G) Delete
How is a POD generated? (continued...)

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<th>Clause</th>
<th>Obligation</th>
<th>Search term</th>
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<tr>
<td>L1</td>
<td>Purpose of OPA. The purpose of this OPA is to describe the duties and responsibilities related to Student Data relating to compliance with applicable federal, state, and local privacy laws, rules, and regulations, as may be amended from time to time. In performing these services, the Provider shall be considered a School Official with a legitimate educational interest, and performing services otherwise provided by the LEA. The Provider shall be in the direct control and supervision of the LEA, with regard to the use of Student Data.</td>
<td>The school will provide the list of data included in this OPA to the provider. The school will review data shared with the provider and data shared by the provider to the provider.</td>
<td>For OPA use.</td>
</tr>
<tr>
<td>L2</td>
<td>Student Data to Be Provided. In order to perform the Services described above, the Provider shall provide Student Data as identified in the Schedule of Data, subject to the provisions of this OPA.</td>
<td>The definition of terms are included as Exhibit C</td>
<td>For OPA use.</td>
</tr>
<tr>
<td>L3</td>
<td>DPA Definitions. The definition of terms used in this OPA are found in Exhibit C. In the event of a conflict, definitions used in this OPA shall prevail over definitions used in any other internal, administrative, or other internal agreements between the Provider and the LEA.</td>
<td>All student data transmitted to the Provider as well as any modifications made to such data, or any student data shared by the school will remain the property of the school. In this case, any student data shared by the school including any personal data shared by the school will be deleted at the close of the school year.</td>
<td>For OPA use.</td>
</tr>
<tr>
<td>L4</td>
<td>School Data, Property, or LEA. All student data transmitted to the Provider pursuant to the Service Agreement is and will continue to be the property of and under the control of the LEA. The Provieder further acknowledges and agrees that all aspects of such Student Data is provided to the Provider as part of the Services which is used in the course of the Provider's direct or indirect relationship to the LEA. The Provider is bound by an obligation not to disclose the Student Data to any third party.</td>
<td>In the event a parent requests to receive or control personal student data in the data transmitted by the Provider, the Provider shall request in a reasonable time frame, as near as possible, that request is made by the Providers themselves. They may no longer be in contact with the school. The Provider shall not refuse to disclose the Parent the contact information of the school.</td>
<td>For OPA use.</td>
</tr>
<tr>
<td>L5</td>
<td>Power Access. The extent of access rights to the Data shall be reasonable for the purpose of and in accordance with the requirements of the Service. The Provider shall ensure that the access rights are maintained only in a manner that no minor student is exposed to a data type that is not appropriate for that student.</td>
<td>When requested by the school, the Provider shall transfer or provide a mechanism for the school to transfer student generated data to a separate account created by the student.</td>
<td>For OPA use.</td>
</tr>
<tr>
<td>L6</td>
<td>Data Retention. In the event that a Provider, a school, or the Provider itself is required to request the Legal Data provided that the school is unable to transfer the data to the appropriate entity, the Provider shall retain such data only for as long as necessary for the completion of the Services.</td>
<td>The agreement does not hold for Prospective Student Data.</td>
<td>For OPA use.</td>
</tr>
</tbody>
</table>

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Downloaded POD Example

JSON or XML

POD ID ➔ Resource Info

DPA Info ➔

Clauses & Benchmarks

Purpose of DPA: The purpose of this DPA is to describe the duties and responsibilities to protect Student Data including compliance with all applicable federal, state, and local privacy laws, rules, and regulations, all as may be amended from time to time. In performing these services, the Provider shall be considered a School Official with a legitimate educational interest, and performing services otherwise prohibited by the LSA. Provider shall be under the direct control and supervision of the LSA, with respect to its use of Student Data.

Resource Info

POD ID

DPA Info

Clauses & Benchmarks