Student Data Privacy Update

Connecting and Securing YOUR Effective Learning Ecosystem
Welcome and Intros
Management Board Elections
SDPC Growth
New Community Theme "Connecting & Securing"
  • The 7 Action Steps
  • Community Tools to Address Action Steps

A4L
  • Non-Profit started in 1997
  • Membership driven with schools, districts, regional and state agencies, other professional organizations and marketplace providers in the Community
  • Collaboratively develops technical blueprints for data to move safely and securely between school software applications
  • Used in every state and Communities in 4 Countries

SDPC
  • Special Interest Group of A4L Community started in 2015
  • Maintains its own governance, oversight and resource support
  • Numerous stakeholders addressing data privacy “Pain Points”
  • Working on three projects identified and worked on by members:
    • Privacy Contract Framework
    • Digital Tools Governance
    • Global Education Privacy Standard
It's Not “One or the Other”!

Student Data Privacy Consortium

No One Gets It!

Everyone Gets It!
SDPC Management Board Election Results

✓ Libbi Garrett, California IT in Education (CITE)
✓ Jessica Kallin, Utah State Board of Education
✓ Allen Miedema, Northshore School District
✓ Tyler Park, Future of Privacy Forum
✓ Steve Setzer, Kimono
✓ Steve Smith, Cambridge Public Schools

• Next Year we add 3 more seats and for two-year terms
• Missing representation: Large companies / International
A4L & SDPC’s Supporting the “New School” Role?

“Leadership and learning are indispensable to each other.”
- John F. Kennedy

• Increased interoperability without the inclusion of privacy requirements equals increased RISK.
• BOTH data sharing and privacy parameters must be identified and communicated.
• Learning institutions often do not have the human and/or fiscal resources to successfully address both parameters
• A4L and SDPC is the ONLY community collaboration that is addressing BOTH interoperability and privacy

The A4L and SDPC Communities will help schools and marketplace providers establish “connected, secure and effective learning ecosystems”
Connecting and Securing YOUR Ecosystem

You MUST Address

✓ Application Vetting
✓ Contracting Process
✓ App Management
✓ Integration
✓ Secure Data Exchange
✓ Quality Control
✓ Professional Learning
Connecting and Securing YOUR Ecosystem

- **Districts/Home**
- **Secure Ecosystem**

You **MUST** Address

✓ Application Vetting
Application Vetting and Resource Registry – The How!

Digital Resource Request Form | Step 1

[Image: Digital Resource Request Form]

Request Support

https://sdpc.A4L.org
# Application Vetting and Resource Registry – The How!

## Approval Support

<table>
<thead>
<tr>
<th>Workflow Step</th>
<th>Order</th>
<th>Make Changes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Did Not Pursue</td>
<td>1</td>
<td>Delete</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Workflow Step: Did Not Pursue Order: 1 Progress Email: This email is to let you know that your Online Resource Request has not been processed. Save</td>
</tr>
<tr>
<td>Educationally-Aligned</td>
<td>2</td>
<td>Delete</td>
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<tr>
<td></td>
<td></td>
<td>Workflow Step: Educationally-Aligned Order: 2 Progress Email: This email is to let you know that your Online Resource Request has been processed. Save</td>
</tr>
<tr>
<td>With Legal Dept</td>
<td>3</td>
<td>Delete</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Workflow Step: With Legal Dept Order: 3 Progress Email: This email is to let you know that your Online Resource Request has no been processed. Save</td>
</tr>
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</table>
Connecting and Securing YOUR Ecosystem

- Districts/Home
- Secure Ecosystem

You MUST Address
- ✓ Application Vetting
- ✓ Contracting Process
Introducing...
The National Data Privacy Agreement V1

✔ Goals:
• 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 and working groups (Legislative)
• Greater impact on, and buy in from, the vendor marketplace = Adoption

## Making Agreements “Simple”

<table>
<thead>
<tr>
<th>NDPA Feature</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>Section</td>
<td>Cover Page</td>
</tr>
<tr>
<td>Section</td>
<td>Page 2 - Options</td>
</tr>
<tr>
<td>Section</td>
<td>Page 3 - Signatories</td>
</tr>
<tr>
<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>

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.
**Usage Suggestions**

- Use only **APPROVED** Alliance NDPA (check YOUR Alliance Site!)
  - *Any State Specific requirements will be included in exhibit G*
- If **ANY** changes to Standards Clause Set then you **CANNOT** use NDPA title
  - *Any School/District/Vendor requirements will be included in Exhibit H*
- Begin to use when best “fits” **YOU** (now, next contract period, etc.)
- The current badge program for vendors will include signatories of NDPA in your, and other, states
- Contact **YOUR** Alliance if you have questions, concerns or suggestions.
Connecting and Securing YOUR Ecosystem

You **MUST** Address

- Application Vetting
- Contracting Process
- App Management
## Application Management – The How!

### Contract/App Management Support

<table>
<thead>
<tr>
<th>Software Name</th>
<th>Agreement Status</th>
<th>Agreement Type</th>
<th>Agreement Dates</th>
<th>Grade Level</th>
<th>Content Area</th>
<th>Data</th>
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</thead>
<tbody>
<tr>
<td>123apps</td>
<td>Vendor Unresponsive</td>
<td></td>
<td></td>
<td>K, 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12</td>
<td>Instructional Technology</td>
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<tr>
<td>ABC Mouse</td>
<td>Active</td>
<td>TEC Vendor-Specific Agreement with Exhibit Location: KLO</td>
<td>Approved: 08/02/2018 Expires: 08/02/2021</td>
<td>K</td>
<td>English Language Arts, Instructional Technology, Math, Science, Other</td>
<td></td>
</tr>
<tr>
<td>ABC-Clio, LLC</td>
<td>Active</td>
<td>TEC Agreement V5B with Exhibit</td>
<td>Approved: 08/15/2018 Expires: 08/15/2021</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

[https://sdpc.A4L.org](https://sdpc.A4L.org)
A Community Growing!

State-wide Alliances

Tools for:
Privacy Contract Building
Application Inventory & Searchable Database
Application Contract Management
Global Education Privacy Standard (GEPS)

‘Tactical’ Privacy Information
- contract to implementation

33 million
Students supported by Tools

9263
School Districts represented

4
Countries Collaborating on Privacy Issues

19890
Signed Vendor Agreements

5243
Applications in Database

17677
Signed “Piggyback” Exhibit E

Classify Learning

Onshape

volan

MOREnet

AFSA Education Foundation
Brightening Your Financial Horizon
Connecting and Securing YOUR Ecosystem

You MUST Address

- Application Vetting
- Contracting Process
- App Management
- Integration
- Secure Data Exchange

Districts/Home

Secure Ecosystem
Connecting & Securing Effective Learning Ecosystems

https://www.A4L.org/page/Unity

Privacy Support
Built in privacy support, based on GDPR and Student Data Privacy Consortium (SDPC) needs.

SIF 3 infrastructure
The REST infrastructure that starts simply and scales easily. Includes JSON conversion and is designed for the cloud. Performance is 'real' (ask Massachusetts!)

Built on SIF 2.x Specification
Leverage existing knowledge and software. Robust, familiar data model.

xPress Roster
Modular API design, most robust roster standard in marketplace. Compliments the Unity Data Model... you can start with xPress Roster and scale up!

CEDS
Added EDFacts & xPress Roster CEDS Mappings in the latest release, 2833 Unity fields mapped to CEDS.

Individual Education Plans (IEPs)
1st standardized API for IEPs. Detailed/extensive objects. Ready for 'in District' use and Student transfers.

EDFacts
Working towards developing a CEDS Integrated Data Store (IDS) Connector for EDFacts Reporting.

Supporting Documentation
EDFacts Mapping, xPress Roster Mapping & Unity Adoption Guidebook - designed to help from concept to integration plan and API design all the way to development.

Mappings Release
August 2020

API Documentation
... coming soon! Follows industry standard API best practices & increases accessibility to all developers.
Connecting & Securing Effective Learning Ecosystems

The Global Education Privacy Standard (GEPS)

School / Department of Education
(Data Controller)

Written Contract
Clause 1
Clause 2

Contract Obligations Pool

Contract Obligations
Obligation 1
Obligation 2

Legal / Policy

Control Benchmark Sets

SDPC Set
Set 2

NIST/ISO/IEEE
“Other” standards

Privacy Object Document (POD)
Obligation 1 XML
Obligation 2 XML

Technical

Vendor
(Data Processor)

https://privacy.A4L.org/geps/
“Privacy On The Wire”
Unity Enabling Privacy Expectations

Header

POD – Technical applicability

Contract

Legal obligations

Technical obligations

Data access

Condition list

Data controller obligations

Data processor obligations

Subject specific obligations

Data deletion obligations

Data sub-processor details

Automate Contract Clause Expectations
Exchange and Vendor Verification

The “POD”
(Privacy Object Document)

https://privacy.A4L.org/geps/
Connecting & Securing Effective Learning Ecosystems

MA Data Hub Service

“PODS”
Connecting and Securing YOUR Ecosystem

You **MUST** Address

- Application Vetting
- Contracting Process
- App Management
- Integration
- Secure Data Exchange
- Quality Control
The SDPC Signatory Badge

- SDPC Members Only Receive
- Signed “Standard/National Agreement”
- State-Specific
- Can be used in marketing communications, product promotion and in the Marketplace
Connecting and Securing YOUR Ecosystem

You MUST Address

✓ Application Vetting
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✓ Integration
✓ Secure Data Exchange
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✓ Professional Learning
Introducing: CIO Support Groups

The Need:
During recent SDPC webinars, CIO’s were asked for their “pain points” – no matter what the topic! Two major response evaluations:
• There was a STRONG interest in getting together to share challenges and opportunities
• About 50% responders interested in follow up conversations about SDPC issues while the other 50% indicated a variety of District Level Technology issues to discuss, share, etc.

The Gatherings:
1) **SDPC Support Issues;** Scheduled during normal working hours, this will provide a venue for an open conversation any and all SDPC Support issues for District Leaders.
2) **District Technology Leaders Special Interest Group;** A less formal open discussion for any and all District operational issues. A place for District Leaders to vent, share stories and possible solutions in a relaxed atmosphere for open discussion.

Meeting information has been sent directly to all SDPC District CIOs, but to find out more information, please contact us.
February 12-13, 2020

OETC Conference

Columbus, OH

Teachers - A Student Privacy 'Cheat Sheet' Session

Why Do I Have to Worry About Student Privacy?: The What: Student Data; The Why: Legal Implications; The How: Student Data Privacy Alliance and Partners; and The Where: Resources

Student Data Privacy: What are YOUR obligations?

Why Do I Have to Worry About Student Privacy?: The What: Student Data; The Why: Legal Implications; The How: Student Data Privacy Alliance and Partners; and The Where: Resources

Student Data Privacy Consortium

'Tactical' Privacy for the Front Lines

https://privacy.44L.org

Over the past 2 years there have been more than 100 student data privacy legislative efforts crafted in more than 36 states with even more activities going on internationally. While most federal, state and territory education agencies voice that they want to support their school’s privacy issues, most realize these needs are best addressed locally by practitioners who are most vested in keeping student data secure and private.

In 2019, the non-profit Student Data Privacy Consortium (SDPC) was established to address these “tactical” and “on-the-ground” needs. Focused on a year of research, outreach surveys, and one-on-one conversations with education agencies and marketplace providers identifying common privacy issues and developing solutions that can be put in place at all levels of the education data continuum. Much of the work of the Community is done in informal or formal groups.

Resources!
Here is the data we will give you and details on how we want it treated.

End Users

Here is how we have treated the data and details on how we can prove it to you.

Providers

Increased interoperability without the inclusion of privacy requirements = increased RISK. Both data sharing and privacy parameters must be identified and communicated.
December 9, 2015
A Party? We are 5 years old!
Thank You

Community Registry Tool Resources Membership

Steve Smith – Cambridge Public CIO ssmith@cpsd.us

Larry Fruth PhD – A4L Community lfruth@a4l.org

Spring 2017