K12 Data Privacy: Annual Review Best Practices

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Let’s do a Kahoot! Poll

Join us at www.kahoot.it
(or with the Kahoot app)
Enter the game pin on the screen
SDPC Definition: What is “Tactical Privacy”?

There are numerous organizations providing some great guidance and effecting practices and/or tools to address various student data privacy issues. The challenge is that much of this work does not address many of the “on the ground” needs seen by schools, districts states and territories each day. We call these issues “tactical privacy” issues. The Consortium’s members address these day-to-day, real-world multifaceted issues faced each day in the protection of learner information.

The Student Data Privacy Consortium
K12 Data Privacy Annual Review - Why?

1. Where is my data going?

2. What data is being shared?

3. Are all my data privacy contracts current?
Data Privacy Life Cycle: Planning for Success

- Collect & Protect
- Use & Share
- Dispose & Destroy
- Use & Share
Determining Data Governance Lifecycle

1. Who owns the data being shared?
2. What is “educationally relevant” data?
3. Resolve the “set-&-forget” culture and don’t forget to take out the trash!

The National Data Privacy Agreement (NDPA) addresses each of these 3 areas!

https://privacy.a4l.org/national-dpa/
Use of data

- Are school board policies in place and up to date that address how data, or personally identifiable data (PII) can be used?
- Are appropriate protocols and measures in place for varying data use cases?
  - Examples include variations between use of data for instructional purposes compared to research purposes.
- Is the data “source of truth” appropriately identified?
- Are data owners appropriately identified and informed about their roles?
  - Examples include owners of English Language Learners (ELL), Exceptional Student Education (ESE), and Free-Reduced Lunch (FRL) data.

Sharing of data

- Do all software agreements include data sharing agreements?
- Does the data sharing agreement identify specific data elements being shared?
- Is there an owner or primary contact for data sharing agreements?
- Is there a way to identify all data shared externally?
- Is a process in place and are resources available to regularly review, annually, all data being shared?
  - The review should answer questions such as “what data is being shared”, “where and with whom is the data being shared”, “is it still educationally relevant to share any or all of the data with the entity”?
- Does a formal process exist to remove/stop data from being shared when appropriate?
  - This is not the same as when an agreement reaches its expiration but rather addresses a process for removing data from its shared state when no longer relevant. For example, an application partner may have requested FRL data for research purposes which have concluded. Do the data still need to be shared with the application partner? If not, how is data removal handled without impacting instructional continuity of the application in the classroom?

* Note: One way to make sure the “Sharing of data” issues are addressed is by using the SDPC NDPA.
Data Privacy Agreement Terms

Standard Clever Terms

- Confirm that Student Data is accessed under the FERPA school official exception
- Commit to accessing and processing Student Data only in order to provide our services
- Affirm that Student Data is controlled by the district
- Agree to delete all Student Data within 72 hours of our receipt of a district's notice to terminate its use of our services, except for Student Data residing on backups or internal logs which will be removed within 60 days

In the event of a security incident, Clever will:

- promptly notify the district of any security incidents
- cooperate with the district to investigate any such incidents, and
- indemnify the district for all reasonable costs associated with compliance with notice requirements arising from a breach of our services
Data Privacy Agreement Terms

Helpful Supplemental Terms

- SDPC National Data Privacy Agreement
- Student Privacy Pledge
- Third Party Certifications (e.g., iKeepSafe)
- Alignment with NIST Cybersecurity Framework
Secure Single Sign-On

Easy and Safe!

Clever provides simple and secure logins to everything your teachers and students need - now with expanded application partnerships.
## Edtech Analytics

### Students Reported
- **Total:** 984
- **Month-wise:**
  - Aug: 120
  - Sep: 130
  - Oct: 140
  - Nov: 150
  - Dec: 160
  - Jan: 170
  - Feb: 180
  - Mar: 190
  - Apr: 200
  - May: 210
  - Jun: 220
  - Jul: 230

### Teachers Reported
- **Total:** 97
- **Month-wise:**
  - Aug: 10
  - Sep: 10
  - Oct: 10
  - Nov: 10
  - Dec: 10
  - Jan: 10
  - Feb: 10
  - Mar: 10
  - Apr: 10
  - May: 10
  - Jun: 10
  - Jul: 10

### Students by Grade
- **Kindergarten:** 25
- **High School:** 75

### Total Apps: 8
- **4** Clever apps (Added by the district)
- **0** Library apps (Added by teachers)
- **4** Other apps (Including any web links)

### App Usage

<table>
<thead>
<tr>
<th>App Name</th>
<th>% Students</th>
<th>% Teachers</th>
<th>Active Time per User</th>
</tr>
</thead>
<tbody>
<tr>
<td>Math Blasters</td>
<td>12%</td>
<td>2%</td>
<td>9 minutes</td>
</tr>
<tr>
<td>Sounds and Letters</td>
<td>6%</td>
<td>1%</td>
<td>1 minute</td>
</tr>
<tr>
<td>Reader Rabbit</td>
<td>4%</td>
<td>40%</td>
<td>2 minutes</td>
</tr>
<tr>
<td>Word Munchers</td>
<td>4%</td>
<td>4%</td>
<td>10 minutes</td>
</tr>
<tr>
<td>Number Munchers</td>
<td>2%</td>
<td>1%</td>
<td>11 minutes</td>
</tr>
</tbody>
</table>

Question data being shared.
Accessing data on your vendor resources/applications to drive ROI conversations:

- **Real Teacher Reviews**
- **See Your Teacher’s Feedback**
Thank you.

We are happy to share the Data Privacy Review Checklist
email: leslie.cameron@clever.com

For more information, visit:

- Clever.com
- @Clever
- Facebook.com/Clever