K-12 Privacy Leaders Working Group Meeting Notes

Wednesday, April 26, 2017 11:00-12:00
Topic: Proactive communication about privacy
35 participants

Georgia Hughes-Webb (Data Governance Manager, West Virginia Department of Education)

How to promote privacy practices

1. Talk about privacy foundations
    1. FERPA, state policies on data access and management
    2. State laws – Student Data Accessibility and Transparency Act
    3. Data Access Management guidance
        - Employee handbooks
    4. Policies and regulations about the point at which data is collected and when its deleted
2. Offer training to internal stakeholders
3. Proactive planning
4. Personal investment – If those protecting the data had, have, or will have children in the schools, it removes the conversation from the abstract

Four strategies when talking to stakeholders

1. Availability
    - Talk about privacy all the time – public forums, presentations, respond to emails and other inquiries quickly
    - Data Squad Newsletter
        - Quarterly, available to public, mentions security improvements and practical tips to keep information safe
        - Data Superheroes - animated characters that relay the information
    - [Website](#) specifically devoted to data privacy
        - Links to FERPA, state laws, and statements of assurances
        - Provide list of student level data to which Dept. has access to
2. Accessibility
    - Family friendly language
    - "Grandma" test
3. Comprehensive, without too much jargon
    - Don't need to get into details but be forthright when answering questions
4. Make information fun
    - Data Privacy Day – promote privacy awareness, cake celebrations, open house with tips, formal trainings for departmental stakeholders, quiz bowl

Lessons learned

- Precise- only the essentials
- Be consistent– make sure all employees are on the same page and relay the same answers
- Use language that makes sense to the average person
- Show and tell
    - Demonstrate how the systems are secure using visuals and trainings delivered to employees

Sean Cottrell (Data Governance Coordinator, Wisconsin Department of Public Instruction)

Data System transparency - WISE
- 3.5 minute video that explains why Dept. collects data

Crafting the message

- Message: why is data important and how do we keep it safe?
- Balance when and when not to make data available
- Creating the website
    - Catalog questions from the public and provide resources that are constantly sought after
    - DPI data privacy pages
    - Identify and vet resources and best practices for educators and administrators
        - Use FERPA as guidance to develop resources around it
    - Inventory data collections, just as we inventory tangible items
        - What you have, why, and how you use it

Who to involve

1. Leverage existing data governance structure
2. Internal
    - Data working group – representation from DPI divisions, employees who work directly with the data, individuals responsible for annual reporting
    - Data committee – director level individuals, help identify policies that needs to be created
3. External
    - Professional education orgs, educators, general public, policy makers

Four focus areas of the website

1. Main audience for privacy pages
    - Parents, students, teachers, admins, data users in general
    - Focused products
        - Make sure people use the product
2. Data and privacy training

3. Pull in resources used by well-known groups
4. Safeguards
   - Data dashboards
   - Talk about the internal procedures that keep the data safe

Website layout

- Easy to find information, Google search function
- Overview of student data privacy
    - FERAP video
    - Additional training materials
- DPI student safeguarding
    - Redactions
    - Requests for data – Who requests? How are their requests vetted? What do they do with the data once they have it? How do they destroy the data?
    - Each district has its own security administrator
        - Application for individuals to request access to the district administrator
- Privacy for Parents
    - Resources from Data Quality Campaign and many others
- District personnel data use
    - Illustrates hierarchy without revealing identities (for protection)
- DPI Data Privacy Training page
    - Training modules
    - Student record confidentiality and sharing data trainings (available to general public)
    - PTEC's FERPA training
- Resource pages
    - Featured section – rotated
    - Parent specific resources

Updates

- Legislative Council Study Committee on School Data
    - Mandated to develop legislation to limit data collected and improve safeguarding (see link)
    - Get a seat at the table to correct misconceptions
- AB 71 – requires state superintendent to create data inventory of all data collected
    - DPI's past practice of proper collection and inventory helped them have all the information ready to go!

Questions/Comments

- How can West Virginia's mascots be implemented beyond a school district?
    - Use them each time privacy is mentioned

- o   Most affective with students so they know their information is safe and what they can do to keep their information safe
- o   Policy 4350 – requires each district to have local contact for data privacy
    - ▪   Local entities can use mascots to drive home the privacy message

Reported Attendee Organizations

1. Dallas Independent School District, Texas
2. Ventura County Office of Education, California
3. Wayne RESA, Michigan
4. Oregon Office of State CIO
5. School Board of the City of Hampton, Virginia
6. Mehlville School District, Missouri

Please email Amelia Vance at avance@fpf.org if you were on the call and your organization name is not listed below.