

K-12 School Privacy Leaders Meeting Notes

Wednesday, June 6, 2017

Time: 11:00am-12:00pm

Topic: Data Governance

Michael Hawes (U.S. Department of Education) on PTAC resources on data governance

- The U.S. Department of Education is launching a new student privacy website (launched last week: <https://studentprivacy.ed.gov>).
- The website is an integration of all of the content that used to be on the PTAC website and the Family Policy Compliance Office (FPCO) website.
- The website has better search capabilities and easier navigation to content and related resources.
- The PTAC and FPCO websites will still be active for another 4-6 months but will be taken down after that time period.

Data Governance Resources

- The U.S. Department of Education has a number of resources addressing data governance.
 - Resources can be browsed by age-range, audience type, etc.
 - The U.S. Department of Education maintains a helpdesk to directly answer student privacy questions.
 - Students and parents can also file a complaint directly on the website.
 - The new and improved FAQ section should provide key support for common areas of difficulty.
- Briefs are available on data governance which provide high level summaries of the types of topics that need to be considered to start a data governance program or to evaluate and improve governance programs already in place.
 - This document provides support to explain what data governance is, why it is important, and the different components of it.
- Another great resource is the Data Governance Checklist.
 - Useful for evaluating the core components of a strong data governance plan.
 - Breaks components of data governance into issues so that student data managers can ask key data questions.
- Resources for mapping data flows are also available.
 - Useful for understanding the first steps of legal requirements for sharing or transferring student data.
- One strongly recommended set of resources is transparency focused.
 - A large source of recent controversy has been the lack of transparency around student data collection and use.
 - Considered very important for combating misinformation.
- One of the most popular resources is the Data Breach Response Kit.
 - A scenario based training resource to act out breach responses and strategies.

- This resource highlights the importance of role assignment, clear communications, and the proper breach response sequence.
- Many more resources are available, please take a moment to check out the website.
- Additional student privacy questions can be sent to privacyta@ed.gov (email).

Question & Answer

Question: If a district, school, or state is at the beginning steps of developing a data governance plan, where do you advise people to start?

Answer: There is a lot of resources out there. The first step is to establish a strong data governance plan or policy in the district or school. This does not have to be expensive and does not have to take a lot of work. There are a lot of districts in the country that have well established governance and privacy programs in place. I would suggest that you reach out to PTAC directly (privacyta@ed.gov) or find a peer district and take advantage of the work they have already done. Don't re-invent the wheel.

Linnette Attai (CoSN's Privacy Initiative) on data governance resources in CoSN's new student privacy toolkit

The Protecting Privacy and Connected Learning Toolkit

- CoSN has recently put out volume 3 of the toolkit as a free data governance guide for student privacy.
 - This toolkit is an expansive resource covering a wide variety of topics from navigating the law to dealing with vendors.
 - This new volume updates almost everything in the toolkit.
 - CoSN has also added a significant amount of new material including COPPA resources, PPRA resource, clickwrap guides, and parental communication.
- CoSN also released a series of cheat sheets for a range of topics.
- Available at cosn.org/privacy.
- These resources are intended to help schools and districts take action.
- Additionally, CoSN has an online peer network that is very robust open to CoSN members and non-members who have expressed interest in the trusted learning environment program.
 - 80 members in the privacy group currently.
 - If you are interested in joining the group please contact Linnette Attai at linnette@playwell-llc.com.

About CoSN

- CoSN is essential the trade organization for chief technology officers.
- The organization was established about 25 years ago.
- Charged with providing the resources to build technology enabled schools and classrooms.
- Covers much more than just privacy.

- CoSN resources are intended to compliment, not replace, PTAC resources.

Teddy Hartman (Howard County Public Schools) on frameworks, strategies, and a tactics for privacy and ed-tech governance

The Howard Country Data Governance Framework

- Developed in conjunction with the Student Data Privacy Consortium.
 - The SDPC is a grassroots organization driven at the local and state level.
- The Framework begins with a series of three data governance levels using leading questions (see slide).
 - Level One is the big bucket items
 - Level Two is the strategic questions and ideas
 - Level Three will be tactical tools to help implement the framework
- After the initial establishment of the level of data governance of a particular school, district, or state is currently in, the framework asks additional questions regarding the goals of developing new data governance provisions (see slide).
 - One of the biggest pain points of having a solid data governance plan is the implementation phase.
 - Answering these questions creates accountability for the quality of a schools' implementation.
- Mobilization should come after answering both the level setting and implementation based questions.
- Care for following the mobilization plan should be guided by the pre-mobilization questions.
- Monitoring and responding to feedback should also take a large role in both implementing and operating a data governance system.
- Over the next two months SDPC is going to be developing a wider framework for the inclusion of additional supporting resources and more level 3 tools.

Question & Answer

Question: What is the timeline for developing the level 3 tools and how does one get involved and participate?

Answer: Our timeline is to have something ready by the summer. In order to participate in the SDPC reach out to Teddy Hartman. The hope is to develop a SDPC for each state.

Question: From your experience at the district level, where do people get started with creating a data governance plan?

Answer: We started (Howard County) by researching all of the resources that we have been talking about today: PTAC, CoSN, FPF. Those resources were all very helpful in developing our program. I would also suggest that the first step is to try and compile a list of key standards that a school system should be thinking about and spending some time to figure out the current landscape and where those gaps are. We noticed that some of the

gaps that we had were focused on slowing processes down. So we were able to identify a few key strategies to close those gaps.

Question: Could you say more about how you might or might not adapt this framework for SEAs as opposed to a school district

Answer: The SDPC is currently much more focused on the LEA level. From the state level, a lot of adaptation depends on what guidance the state has set around its own privacy policies. Colorado has just set a new state level policy around communication and transparency. Whereas MD has different standards.

Question: What support, ideally, would you want now in your process and what support would you have wanted when you were beginning your data governance process?

Answer: I think from our perspective, the idea of a state level data sharing agreement would be helpful. If there was a way for the state to help develop a state level contract for districts to use and unify vendor relationships throughout a state's different district systems. Vendors are generally not happy about having individual negotiations which each district.

Amelia Vance (FPF) on FERPA|Sherpa launch

FERPA|Sherpa Resources

- FERPA|Sherpa, FPF's education privacy resource center website, has been relaunched this week.
- The website has expanded and new content for both old and new audience types.
- For example, there are new sections for students, educators, policymakers, K-12 officials, LEAs, SEAs, and Higher Education.
- We have also supplemented our information for ed tech vendors and parents.
- Please take a look and share any feedback with Amelia Vance.
- The website has a range of different resources including guides for developing data governance plans.

FERPA|Sherpa Resources Search Center

- The website has enhanced capabilities for resource searches.
- Users can browse resources by type of audience, type of resource, and a variety of tags.
- Users can add or remove as many different search categories as they would like and can sort results by date or relevance.
- A quick search of data governance resources brings up several great documents for supporting data governance plan development.
- Additional resources can and should be submitted to add to the search center
- There is also a website page that actively tracks different state legislation.

Question & Answer (whole group)

Question: What resources have been especially helpful to you?

Audience Answer: State guidance resources are always very helpful. Communication from an SEA is always useful because there are a lot of districts and its helpful to know what states are working on. We are working on figuring out what inventory we have so it would be great to know what work is already being done.

Question: What resources have been especially helpful to you?

Audience Answer: At the state level, we have had some difficulty getting a data governance plan off the ground. What we have found that has actually helped quite a bit is the data governance checklist available at PTAC. It provides a concise definition and the components of data governance.

Attending Organizations

1. Allegheny Intermediate Unit, Pennsylvania
2. Beaver Valley Intermediate Unit, Pennsylvania
3. Bloomington School District, Illinois
4. California Department of Education
5. Cambridge Public Schools, Massachusetts
6. Center for Educational Performance & Information, Michigan
7. Colorado Department of Education
8. Connecticut Department of Education
9. Consortium for School Networking
10. Dallas Independent School District, Texas
11. DC Office of the State Superintendent of Education
12. DC Public Schools
13. Delaware Department of Education
14. Denver Public Schools, Colorado
15. Fairfax County Public Schools, Virginia
16. Georgia Department of Education
17. Hillsborough County Public Schools, Florida
18. Houston Independent School District, Texas
19. Howard County Public Schools, Maryland
20. IlliniCloud/K12 Federation
21. Kentucky Department of Education
22. Los Angeles Unified School District, California
23. Loudoun County Public Schools, Virginia
24. Louisiana Department of Education
25. Maine Department of Education
26. Maryland Department of Education
27. Miami-Dade County Public Schools, Florida
28. Minnesota Department of Education
29. North Dakota Education Technology Services
30. Oregon Office of State CIO
31. School Board of the City of Hampton
32. Utah Department of Education
33. U.S. Department of Education

34. Washoe County School District, Nevada
35. Wisconsin Department of Public Instruction

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