

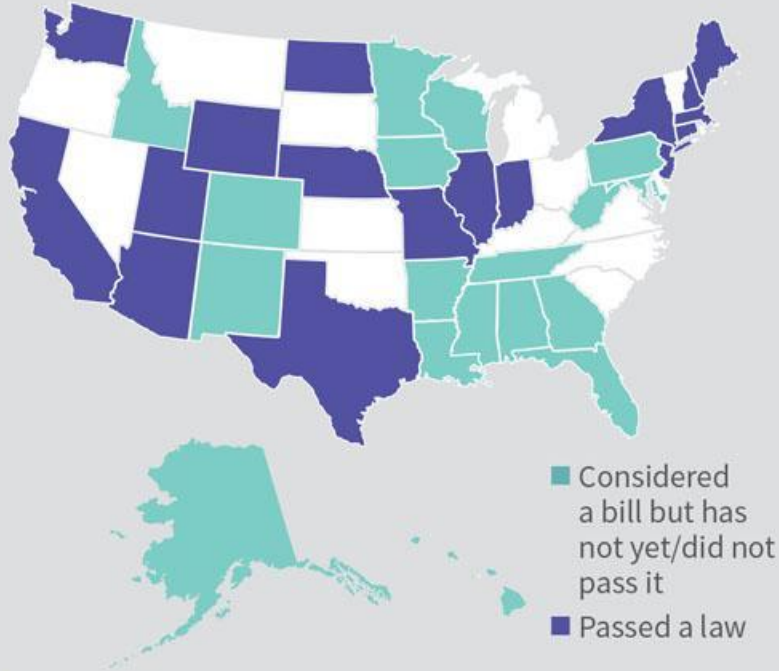
The Bumps and Bruises So Far

Weber School District

Our Team

- Lynn Raymond, Director of Technology, Student Data Security Officer
- Nick Harris, Supervisor of Technology, WIHS Principal
- Tanya Miller, Student Data Security Manager
- Heidi Alder, Legal Counsel

States That Considered and Passed Legislation to Protect Privacy



Over half of the education data bills that state legislators considered in 2017 were related to student data privacy.

House Bill 358 Importance



Required by HB358

- Appointed Student Data Security Manager
- Data Governance Plan
- Student Data Privacy Policy
- Metadata Dictionary
- IT Security Plan
- Staff Training
- Student Data Disclosure Statement



How we came up with our plan...

- Went to other districts' websites, Utah and other states
- Took advice from UETN, USBE and directors from other districts
- Worked closely with our legal counsel (Heidi), who is working with other districts' legal counsels
- Researched NIST best practices
- Lots of ibuprofen

Data Governance Plan

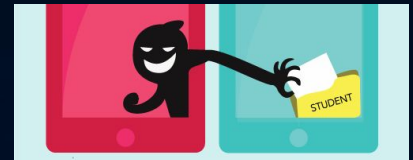
<http://wsd.net/employees/student-data-privacy/student-data-privacy-overview/data-governance-plan>

- Physical and Data Security
- Breach Protocol
- Handling of Student Data
- Third Party Vendor Requirements
- CIA of Student Data (Confidentiality, Integrity and Accessibility)
- Appropriate level of security for transmitting and storing information

Student Data Privacy Policy

<http://wsd.net/employees/student-data-privacy/student-data-privacy-overview/student-data-privacy-policy>

- Data Protection Principles
- Consent for Collection, Management, Deletion
- Transfers of Data
- Student Rights



Metadata Dictionary

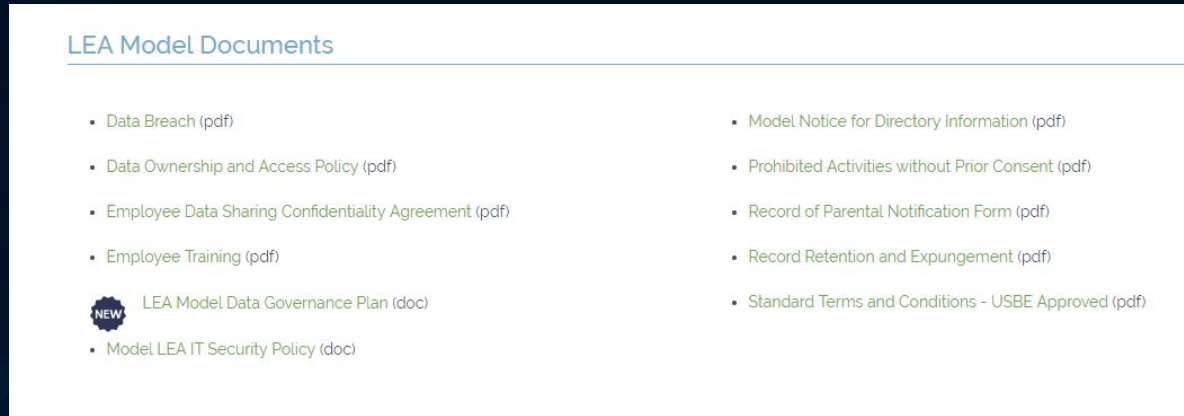
Simple form to fill out on USBE's website for each third-party vendor that receives student data.

Data Recipients for WEBER DISTRICT	
Add Data Recipient	
Amplify - N/A	
APEX - N/A	
BrainPOP - N/A	
Canvas Learning Management System - N/A	
Celtx - N/A	
DIBELSnet - N/A	


<https://datagateway.schools.utah.gov/DataDictionary/Home>

IT Security Plan

Template issued by USBE that can be modified by LEAs quickly to fit each individual district.

A screenshot of a webpage titled "LEA Model Documents". The page has a white background with a blue header. Below the header, there is a list of documents in two columns. The first column includes: "Data Breach (pdf)", "Data Ownership and Access Policy (pdf)", "Employee Data Sharing Confidentiality Agreement (pdf)", "Employee Training (pdf)", "LEA Model Data Governance Plan (doc)" (with a "NEW" badge), and "Model LEA IT Security Policy (doc)". The second column includes: "Model Notice for Directory Information (pdf)", "Prohibited Activities without Prior Consent (pdf)", "Record of Parental Notification Form (pdf)", "Record Retention and Expungement (pdf)", and "Standard Terms and Conditions - USBE Approved (pdf)".

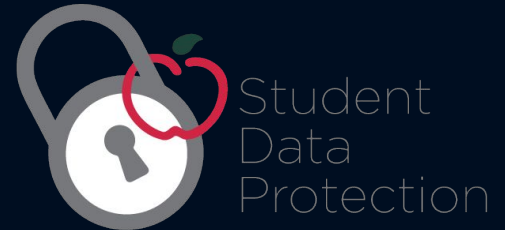
LEA Model Documents

- Data Breach (pdf)
- Data Ownership and Access Policy (pdf)
- Employee Data Sharing Confidentiality Agreement (pdf)
- Employee Training (pdf)
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<http://www.uen.org/usbe-datasecurityprivacy/lea.shtml>

Our plan for protecting students' data

- All 3rd party vendors who require student data must go through a vetting process
- Memorandum of Agreement
- Single Sign On
- Training all staff on House Bill 358



Digital Resource Vetting

In order for a third-party vendor to be approved, they must go through the evaluation steps:

1. Teachers and Staff will submit the website/app to their Administrator
2. If it is approved by their Administrator, then it will be submitted to the Student Data Security Manager (SDSM)
3. The SDSM will go through the privacy policy and terms of service of each submitted website
4. The SDSM will also view all security protocols listed for the website, including login security.
5. If the website is secure, then it will be turned over to the Evaluation Committee, which is comprised of Teachers, Administrators, and Curriculum
6. The Evaluation Committee will go through all websites and determine if they are aligned with curriculum and if similar websites are already being used in the district
7. Once the website/app is approved by the Evaluation Committee, it will be routed back to the SDSM
8. The SDSM will then send the company a personalized Memorandum of Agreement for signature
9. When the Memorandum of Agreement is signed and returned to the SDSM, one of two things will happen: A. The website will be added to the approved list. B. The website will be turned over to development for login sync with district servers and then added to the approved list
10. After websites are approved, their metadata will then be uploaded to the Utah Metadata Dictionary

Vetting List

Approved With Stipulation		
Curriculum	Website Name	Login and Use Instructions
Athletics	<ul style="list-style-type: none"> Online Newspapers RunnerCard 	<ul style="list-style-type: none"> Online Newspapers (Must not use student logins) RunnerCard (Use as usual)
Classroom Management - Elementary	<ul style="list-style-type: none"> Websites Pending 	<ul style="list-style-type: none"> Websites Pending
Classroom Management - Secondary	<ul style="list-style-type: none"> Websites Pending 	<ul style="list-style-type: none"> Websites Pending
CTE	<ul style="list-style-type: none"> AET Choosemyplate.gov DECA FCCLA FFA Flashcut Graspable Math HOSA Judging Card Keyboardingonline Lightbot Med Term Book Website Mobile CSP Precision Exams Sketchup S/P2 Utah Restaurant Assn Weber Morgan Health Department 	<ul style="list-style-type: none"> AET (Use as usual) Choosemyplate.gov (Must not use student logins) DECA (Use as usual) FCCLA (Use as usual) FFA (Use as usual) Flashcut (No logins required) Graspable Math Google Login and Use Instructions Pending HOSA (Use as usual) Judging Card (Use as usual) Keyboardingonline Google Login and Use Instructions Pending Lightbot (Use as usual) Med Term Book Website (Use as usual) Mobile CSP Google Login and Use Instructions Pending Precision Exams (Use as usual) Sketchup Google Login and Use Instructions Pending S/P2 (Use as usual) Utah Restaurant Assn (Use as usual) Weber Morgan Health Dept (Use as usual)

Memorandum of Agreement

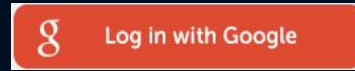
This document **MUST** be signed by a third-party vendor who receives student data of any kind.

Some Key Points:

- Student Data remains WSD's property
- Student Data cannot be sold or given away
- Third Party Vendor is responsible for breaches
- Third Party Vendor can be audited by WSD
- Third Party Vendor must scrub data at WSD's request

What happens to the **MUST** if we can't get a signature?

Single Sign On

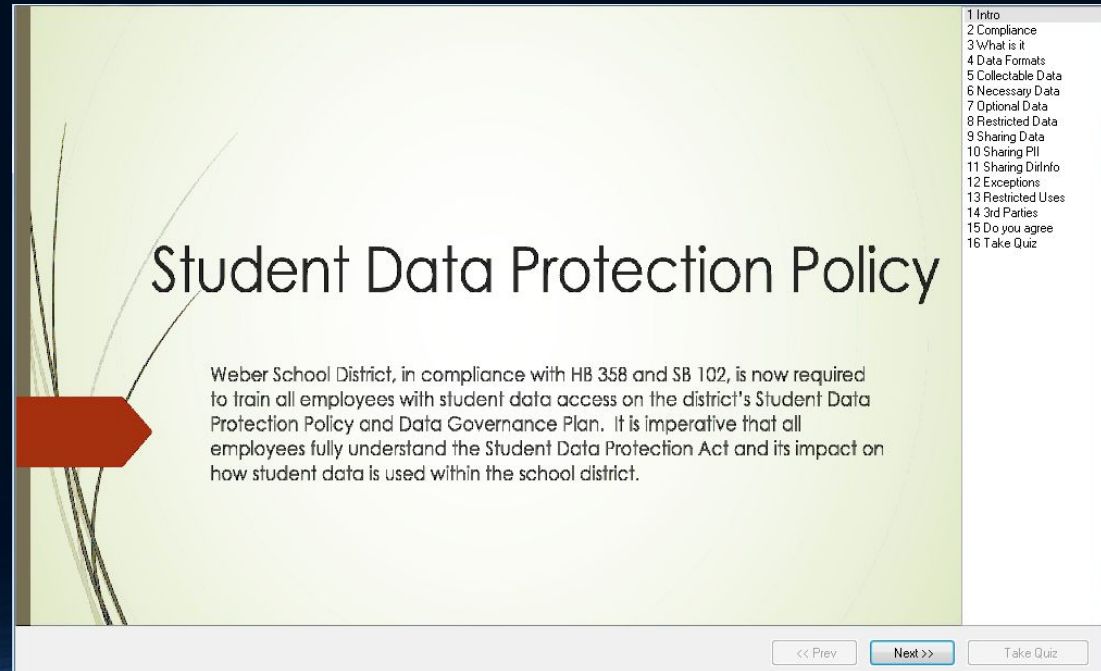


Training all staff (Where SB 102 meets HB 358)

Training is required to access our Student Information System and Lunch Systems. If training isn't done by a set deadline, then access is denied.

Everyone who has access to student data must take this training, as per HB358.

Training Slides



The slide features a light green background with a decorative graphic of thin, dark, curved lines on the left side. A large, solid red arrow points from the left edge towards the text. The text is centered and reads: "Student Data Protection Policy" in a large, black, sans-serif font, followed by a paragraph: "Weber School District, in compliance with HB 358 and SB 102, is now required to train all employees with student data access on the district's Student Data Protection Policy and Data Governance Plan. It is imperative that all employees fully understand the Student Data Protection Act and its impact on how student data is used within the school district." On the right side, there is a vertical table of contents. At the bottom, there are three buttons: "<< Prev", "Next >>" (highlighted with a blue border), and "Take Quiz".

Student Data Protection Policy

Weber School District, in compliance with HB 358 and SB 102, is now required to train all employees with student data access on the district's Student Data Protection Policy and Data Governance Plan. It is imperative that all employees fully understand the Student Data Protection Act and its impact on how student data is used within the school district.

- 1 Intro
- 2 Compliance
- 3 What is it
- 4 Data Formats
- 5 Collectable Data
- 6 Necessary Data
- 7 Optional Data
- 8 Restricted Data
- 9 Sharing Data
- 10 Sharing PII
- 11 Sharing DrInfo
- 12 Exceptions
- 13 Restricted Uses
- 14 3rd Parties
- 15 Do you agree
- 16 Take Quiz

<< Prev Next >> Take Quiz

Training Slides

Training :: Student Data Protection

Do you agree?

Simply Clicking, "I Agree" on third-party vendor websites could potentially lead to a FERPA, PPRA, or Student Data Protection Act violation!

These are called Click-Wrap Agreements and can be legally binding, yet are very rarely read.

Once a district employee clicks "I Agree," the terms of the agreement will likely govern what information the provider can collect from or about students, and with whom they may share it.

Never click "I Agree" when using an online third-party vendor's program. Let the Student Data Manager read through the Terms of Service (TOS) or End User License Agreement (EULA) to verify its validity and legal accuracy. Every service or application needs to be evaluated and support the school district's broader missions and goals.

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Training Quiz

Quiz :: Student Data Protection

Question 3 - Data Collected

What information cannot be collected from students?

select one

- Grade
- Telephone Number
- Social Security Number
- Physical Address
- Parent Contact Information

1 Laws
2 Necessary Data
3 Data Collected
4 Student logins
5 Data Manager
6 Opt-Out
7 Act Date
8 Click-Wrap
9 I Agree

<< Prev Next >> Submit Quiz

Training Quiz

Quiz :: Student Data Protection

100% - You Passed!

Thank you for taking the time to learn more about Student Data Protection. These training slides will be available in MyStudent under the "Data Protection" menu. You can now close this window.

- ✓ 1 Laws
- ✓ 2 Necessary Data
- ✓ 3 Data Collected
- ✓ 4 Student logins
- ✓ 5 Data Manager
- ✓ 6 Opt-Out
- ✓ 7 Act Date
- ✓ 8 Click-Wrap
- ✓ 9 I Agree

Close Quiz

Transparency

<http://wsd.net/employees/student-data-privacy/student-data-privacy-overview>



