

SDPC Alliance Best Practices

**We WANT
your input!**



SESSION PRESENTERS

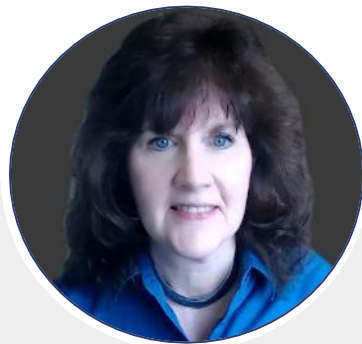


Bruce Patrou

Florida

Chief Information Officer

St Johns County SD



Connie Coy

Missouri

Cybersecurity Analyst

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Dawn Schiavone

Ohio

Student Data Privacy Officer

NBEC/NWOCA



Ramah Hawley

Multiple

Director

TEC Student Data
Privacy Alliance

Session Agenda

- Share outs from each Alliance
 - Florida
 - Missouri
 - Ohio
 - TEC
- Q & A

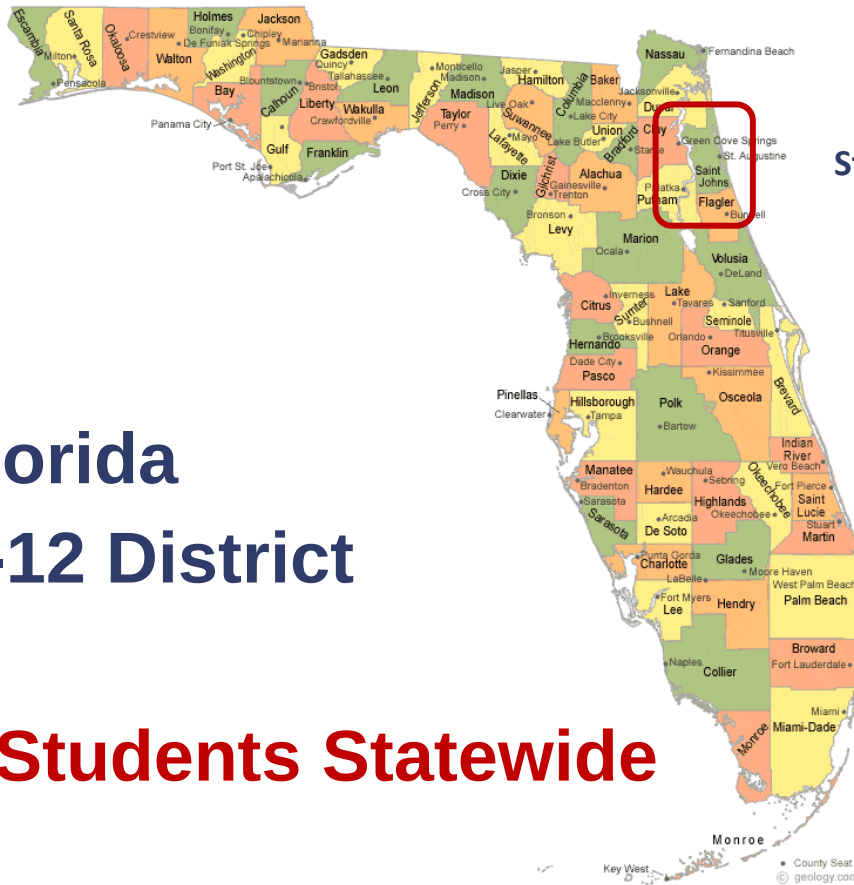
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St. Johns County

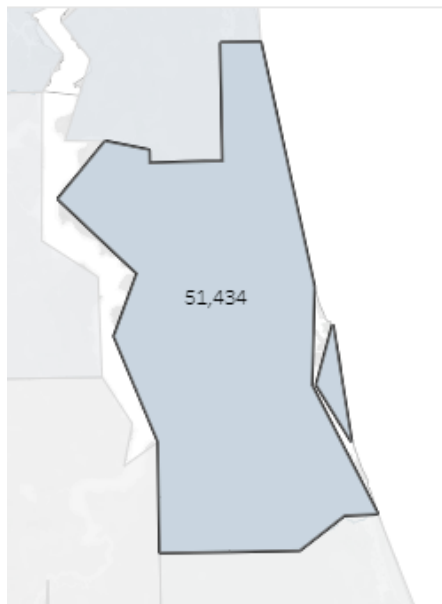
67 Counties in Florida Each makes up a K-12 District

2023-24: 2,872,309 Students Statewide



St. Johns County Student Enrollment

Overall Student Enrollment Counts
2023-24, Survey 2 – Fall, District: All



St. Johns County School District

2023-24: 51,434 Students



What Changed in FL Administrative Code 6A-1.0955 Education Records in Nov 2022?

- School boards must adopt policies for review/approval of Online Educational service that students or parents are required to use.
 - **Policy must include:**
 - Comply w/State and Federal laws
 - Designate a person to review/approve Online Educational Services
 - Procedure to notify parents if Student PII is collected
 - Procedure to notify parents how it will be used, when and how destroyed, terms of any re-disclosure
 - Prohibit Online Educational Services from selling/sharing student PII for commercial use without providing parents a means to opt-out

Change Highlights – Sec 9



What Changed in FL Administrative Code 6A-1.0955 Education Records in Nov 2022?

- For any Online Educational Service, a student is required to use:
 - The District must provide notice on its website of:
 - The Student PII information collected
 - How it will be used
 - When it will be destroyed and any re-disclosure
 - Provide a link to the Terms of Service and Privacy Policy, if available

Change Highlights – Sec 9



Student Online Personal Information Protection Act – FS 1006.1494

- **The Operator (Service Provider) May Not do the following:**
 - Engage in Targeted advertising
 - Amass a Student Profile (except for K-12 purposes)
 - Sell, share or rent Student Data
 - Disclose Student Information except for specific cases (comply w/law)

Synopsys

New State Law effective July 1, 2023



Student Online Personal Information Protection Act – FS 1006.1494

- **The Operator (Service Provider) Shall do the following:**
 - Collect no more student data than needed
 - Implement and maintain reasonable security procedures and practices
 - Delete the covered information at the conclusion of the course or corresponding program and no later than 90 days after a student is no longer enrolled in a school within the district, upon notice by the school district.

Synopsys New State Law effective July 1, 2023



What steps can you take to meet these new requirements for Student Data Privacy?

	Steps to take	FL law
✓	Develop and approve a Board Policy 7.143	6A-1.0955 FAC
✓	Develop a process to review and Approve Software *PIPP online review process w/designated staff	6A-1.0955 FAC
✓	Provide PII notice on your Website (Ref SDPC.A4L.org website)	6A-1.0955 FAC
✓	Adopt the National SDPA w/Exhibit G (FL) *Prohibits selling/sharing/releasing Student PII data *Prohibits targeted advertising or profiling *Outlines Security measures and Compliance w/State, Fed laws	6A-1.0955 FAC, 1006.1494 FS
✓	Execute SDPAs or piggyback from other FL Districts	6A-1.0955 FAC, 1006.1494 FS
✓	Post SDPAs to SDPC.A4L.org website	6A-1.0955 FAC

Lessons Learned & Best Practices

- Adopt the National Student Data Privacy Agreement
- Gain acceptance for Exhibit G (state specific laws)
- Publish the State Standard SDPA (for all Districts to use)
- Clean up the State Alliance agreement types (make if simple)
- Train District Admins on:
 - How to complete SDPA's
 - How to upload SDPA's to the SDPC website
 - How to handle changes in Exhibit H

Missouri

Connie Coy

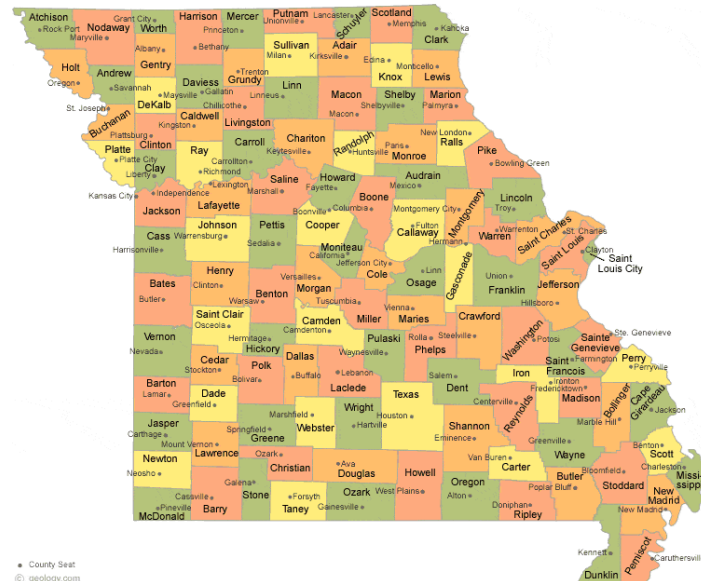
Cybersecurity Analyst

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Missouri Demographics

554	Public School Districts
114	Counties
22,937	Largest District (Springfield R-XII)
22	Smallest District (Missouri City K-8)
879,000	Total Student Enrollment Statewide



Missouri Research and Education Network

- MOREnet 1991 (UM System/Self-funded)
 - Membership Consortium
 - 55 HE
 - 475 Public/Private K-12
 - 120 Public Libraries
 - 60 State/Local government/Healthcare
- Services
 - Statewide Backbone
 - WAN/LAN Consulting/Cybersecurity/Data Interoperability/Teacher Tech in Classroom Training
 - Conferences and Trainings Off and On Site
- Missouri Student Privacy Alliance (MOSPA)
 - Started July, 2020/ NDPA August, 2020



Missouri Student Privacy Alliance (MOSPA)

- MOREnet
 - MOREnet pay Alliance fee/Members free (Included in Services Package)
 - SDP Training/Resources
 - Resource Registry Onboarding and Troubleshooting
 - No Legal Assistance
 - Redlines don't negate NDPA
 - **Approve Agreement before Live**
 - **Follow up Training and Troubleshooting**
- Districts
 - Receive approval to use the NDPA
 - Negotiate Redlines/Obtain Legal Assistance
 - Process and Upload agreements

Start Up



**Missouri Student
Privacy Alliance**

- MOSPA Leadership Team
 - 8-10 Districts
 - Redlines acceptable to MO Districts
- Protect, Standardize, Simplify, Proactive
- What Does a Data Privacy Agreement Do?
 - Designates Vendor as School Official/FERPA
 - Vendor-based data breach - Risk of protecting student data shifted to Vendor
- SDPC Alliance Support/Show Me State

The Education Cooperative (TEC) DPA Services

- Roadblocks for Growth
 - Administrative Tasks
 - Resource Registry
 - Processing Agreements/Electronic Signatures
 - Vendor Negotiation/No Consistent Exhibit H's Nationally
 - No SDP Legal Assistance
- April 2024 - TEC District Model Service/Modest Fee
 - Administrative Tasks
 - Vendor Negotiation
 - Signatures/**Inherent SDP Legal Support**
 - Districts pay modest fee
- Timing
 - NDPA v2
 - 3 year Renewals

Lessons Learned & Best Practices

- **MOSPA Leadership Team**
- **Turn on Approval Process**
- If the vendor has redlines, change the name on the title page to Vendor-Specific.
- No Apostrophes in names or addresses of Participating Districts contact information.
- **Look at the separate uploads of Exhibit E's.**
- District fill out Exhibit A.
- There can be **only one user** assigned Exhibit E Signer role per district.
 - District Customization - Check Alternative Staff Member Sign E's
- When saving the signed agreement from the vendor:
 - **Print/PDF**
- **SDPC Alliance Members are excellent!** Get Involved in meetings.

Ohio

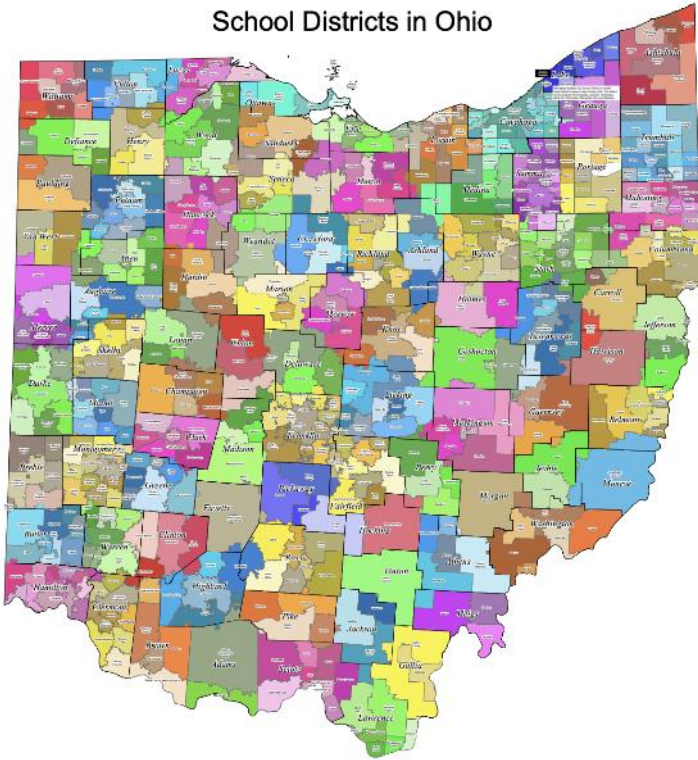
Dawn Schiavone

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The Education Makeup of Ohio

School Districts in Ohio



611	Public School Districts
88	Counties
17	Information Technology Centers (ITCs)
51	Education Service Centers (ESCs)
45,338	Largest District (Columbus Public)
10	Smallest District (Kelley's Island)
2,638	Average District Student Enrollment
1,611,956	Total Student Enrollment Statewide

Ohio Alliance History...

- 2017 - First districts begin to investigate SDP & Vetting
- **2018 - DoE purchases SDPC accounts for Ohio**
- **2018 - Learn21 became SDPC Ohio Alliance**
- 2019 - Awareness building of need for SDP work
- 2020 - COVID
- **2020 - Large Group Begins Ohio DPA Work**
- 2021 - Ohio adopts SDPCs NDPA
- 2021 - First agreement entered into registry (January)

Ohio Alliance History...

- 2022 - Alliance Admins (four CTOs) begin presenting sessions to regional groups and at Ohio conferences
 - Registry Training
 - NDPA
 - Creating SDP plans to change district culture
- **2022 - (Dec) Dawn - Student Data Privacy Officer, NBEC**
- **2023 - (Feb-Dec) Dawn completes Ohio Registry Audit**

Ohio Alliance History...

- 2023 to present
 - Continue the Ohio progress for SDP & SDPC
 - Present at state & national conferences (CoSN, OETC, Brainstorm, Learn21/ETLA, ITIP, as well as at ITCs, ESCs)
 - 2024 CoSN w/ Ramah Hawley & John Lyman
- 2024 - First renewal (January) !!
- **2024 - Investigating additional paid services models**
 - Recognizing pain points
 - Districts need help

Ohio SDPC Alliance Information

- Alliance Leader Assistance
 - SDP Planning - Training & Workshops
 - Resource Registry Onboarding & Ongoing Support
 - Follow up on Agreement processes
 - Approve Agreement before Live (Agreement Holding E
 - **No Legal Assistance**
- District Responsibilities
 - Negotiate Redlines/Obtain Legal Assistance
 - Process and Upload agreements



Training & Workshop Opportunities

- How to get from “Wild Wild West” to “Approve BEFORE Use”
- Developing Your District SDP Plan
- Resources & Strategies to Build and Execute Your SDP Plan
- Understanding the NDPA
- Using The Registry



Student Data Privacy Roadmap

A tool to guide local educational agencies on their journey to student data privacy compliance.



Lessons Learned & Best Practices

- **Getting Started**

- Find small group of districts ready to put in time in order to lead the charge - become alliance admins
- Have alliance admin with dedicated time to manage alliance
- Alliance admin(s) - get involved in SDPC Nationally
- Ensure all districts in alliance have “Agreement Holding Enabled”

- **Early On**

- If agreements already in registry prior - PERFORM AUDIT & FIX ISSUES ASAP (and then turn on Agreement Holding)
- Create onboarding/tutorial documents
- Present at conferences and to area districts
- Have access to legal counsel

TEC

Ramah Hawley

Director

The Education Cooperative

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The Education Cooperative (TEC)

- Located in Walpole, Massachusetts
- **Established in 1968, a 501(c)(3) non-profit Massachusetts Educational Collaborative**
- Develops & coordinates educational programs to meet the needs of member communities
- Promotes inter-district collaboration to achieve more than one district can do alone
- Operates three special schools - TEC Campus School, TEC High School, and TEC Phoenix Academy
- Provides Professional Development, Cooperative Purchasing, Career Exploration, and “Job-Alike” programs

TEC Student Data Privacy Alliance Origins

At the request of our member communities, in **2017** we launched a service created to:

1. Provide school districts with shared access to training, administrative support and expert legal counsel.
2. Leverage our collective influence with digital providers to protect student data; and
3. Accelerate and expand the adoption of a common student data privacy agreement used by all member schools.



TEC Student Data Privacy Alliance Services

On behalf of our participating districts, we provide both the **administrative** and expert **legal** services necessary to facilitate the negotiation, collection, and posting of all Student Data Privacy Agreements, using a collaborative cost-sharing model.



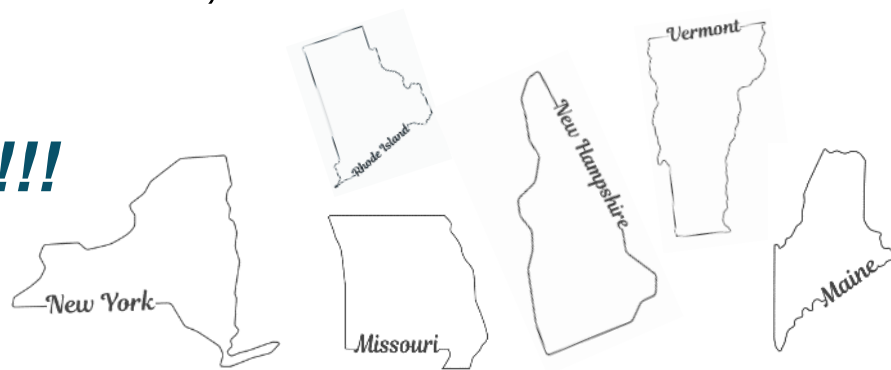
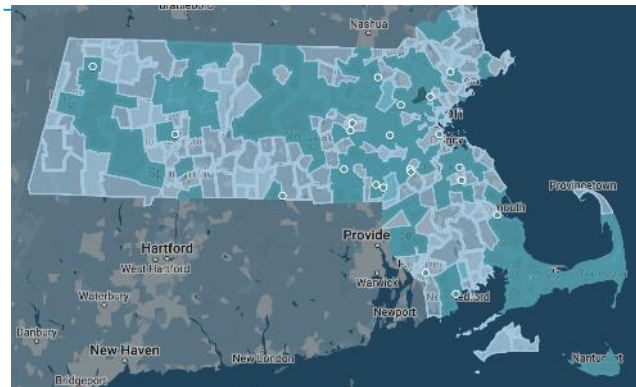
TEC

Student Data Privacy Alliance

TEC SDPA Growth

- 17 original collaborative member school districts
- Now hundreds of districts serviced
- 7 states (*Massachusetts, New Hampshire, Rhode Island, Maine, Vermont, New York, and Missouri**)

...And We're Still Growing!!!



TEC SDPA By The Numbers...

State	Valid Posted DPAs/Es	Available Exhibit Es	Year Joined	2023 K-12 Statewide Enrollment
MA	14,041	1,792		902,800
ME	3,034	1,668	2020	170,000
NH	11,870	1,803	2019	166,800
RI	2,031	1,758	2021	135,300
VT	2,130	1,395	2022	82,700
NY	883*	224	2024	2,451,400

We now use a Multi-State National DPA with 7 individual State Exhibit Gs. Any participating district from any of the 7 states can piggyback with Exhibit E.

April 19, 2024 data

Lessons Learned & Best Practices

- **Legal:** Use an attorney, an expert in student record and privacy laws. Don't agree to DPA modifications without the right legal advice/review.
- **Provide Support:** This work can be hard for individual school districts. They often lack the necessary time and resources.
- **PD and Training:** Be sure Administrators, Faculty and Staff fully understand their legal and ethical obligations to protect student data, and understand the risks and liabilities of using unapproved apps.
- **Centralize Services:** Streamline efforts to minimize redundancy, maximize efficiency and reduce costs.
- **Leverage Collective Strength:** Pool resources and expertise to enhance your DPA program.
- **Partner:** Treat vendors as your partners in privacy, not as adversaries. It is sometimes our role to educate EdTech vendors about laws that impact *school districts*.
- **SDPC:** Get involved in the SDPC community. Share your experiences, knowledge, and pain points. We are all in this together!

Q & A

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your input!**

