



student ^{data} sharing

<http://goo.gl/OeFjp9>



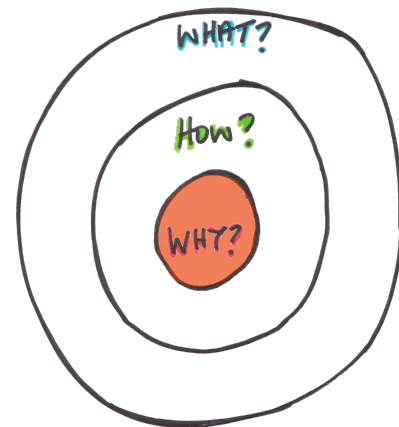
@martypark | @amysmusings

<http://goo.gl/OeFjp9>



Our Task

1. Understanding the story (why)
2. Toolkit (how)
 - a. Teacher Email (from Superintendent) - draft
 - b. Partner Email (from EdTech Leader/ CIO)
 - c. Workflow/Logic Model
 - d. Data Sharing Signature sheet >>Crosswalk>>>TOS/Privacy Policy
 - e. Teacher Training (next steps)
3. Amy's List (what)





THE
JOURNAL

K-12 NEWS

OPINION

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NEWSLETTERS

TRANSFORMING EDUCATION THROUGH TECHNOLOGY

Common CoreAdmin ToolsK-12 GrantsSpecial NeedsProfessional Development

Security

Latest DC Snafu Exposes Student Data on Dropbox

By Dian Schaffhauser | 02/16/16

About 12,000 students who possess individualized education programs (IEPs) had personal information posted to a [public Dropbox site](#) attending schools in Washington, D.C. [Reporting by the Washington Post](#) said the data was inadvertently made available online "for several hours" on Tuesday and has since been taken down. The file with the private information was uploaded to the



CYBERSECURITY

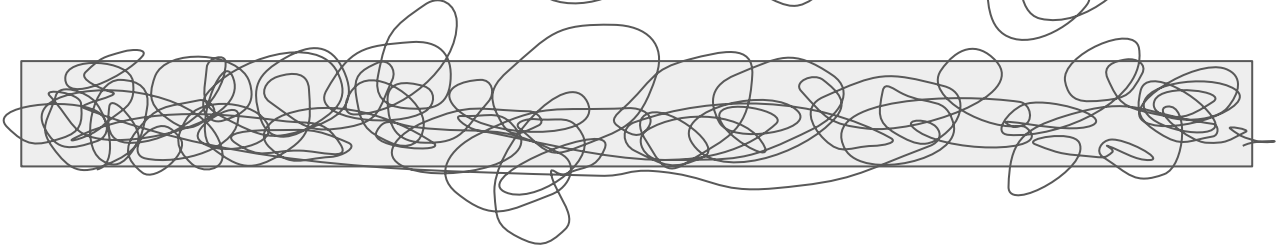
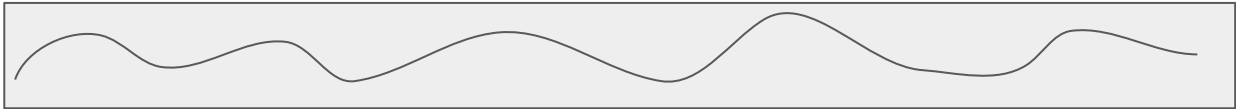
[TECHNOLOGY](#) | [RE/CODE](#) | [MOBILE](#) | [SOCIAL MEDIA](#) | [ENTERPRISE](#) | [GAMING](#) | [CYBERSECURITY](#) | [THE PULSE @ 1 MARKET](#)

VTech hack: Data of 6.4M kids exposed

Wednesday, 2 Dec 2015 | 12:08 AM ET

[COMMENTS](#) [Start the Discussion](#)

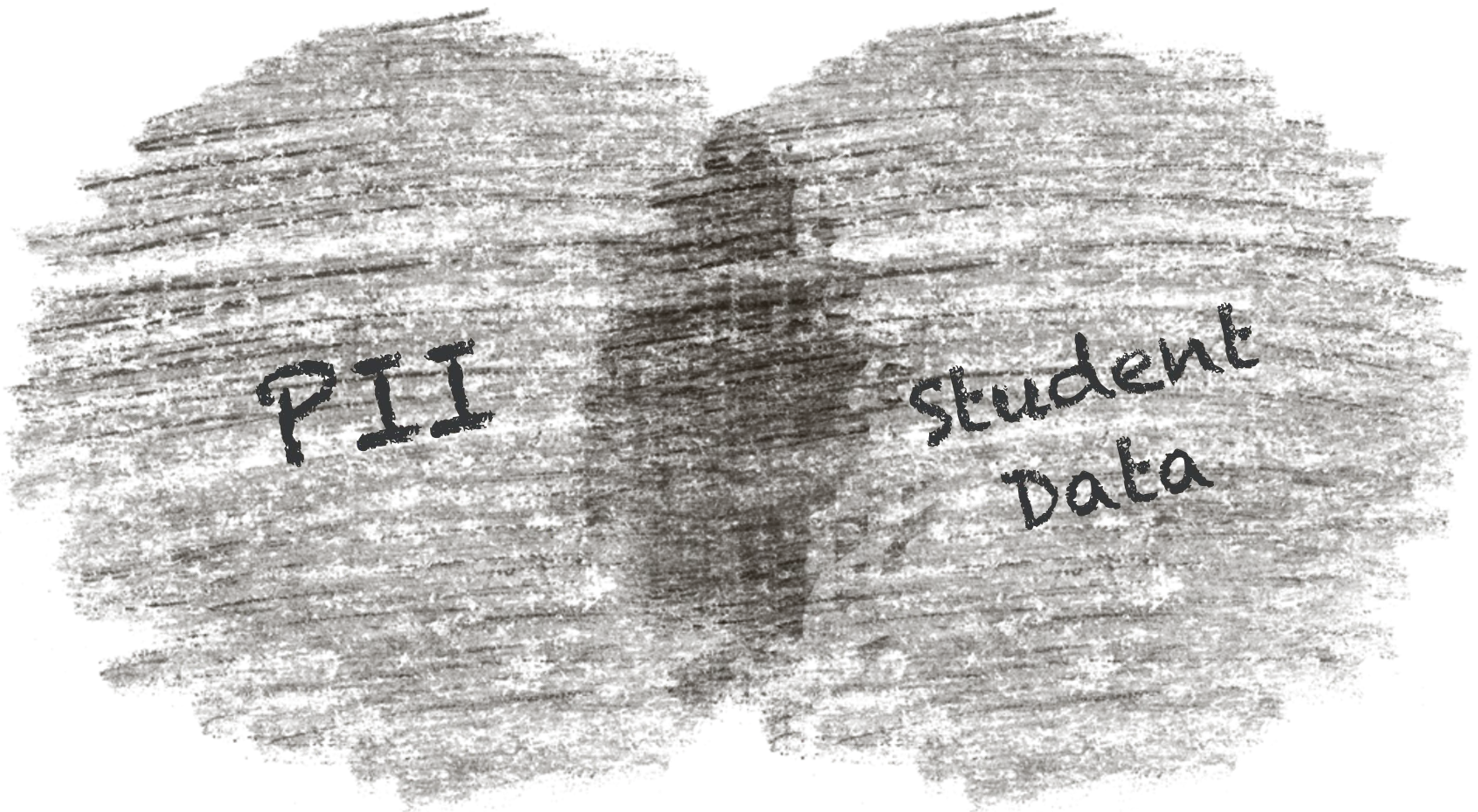
levels of **messy**



levels of messy

risk vs. reward





PII

Student
Data

the why

**HB 5
adults
+
students**

**HB
232
students**

PII

**student
Data**

Key: Breach Notification
Work that happens after (something bad happens).

**Probably
the most
important**

Key: Cloud Partners
Work that happens before you engage



PI
5

Student Data
232

"Personal information" means an individual's:

at least 1
of these

first name + last name
first initial + last name
personal mark
biometric or genetic print or image

+

at least 1
of these

An account number, credit card number, or debit card number that, in combination with any required security code, access code, or password, would permit access to an account
A Social Security number
A taxpayer identification number that incorporates a Social Security number
A driver's license number, state identification card number, or other individual identification number issued by any agency
A passport number or other identification number issued by the United States government;
Individually identifiable health information



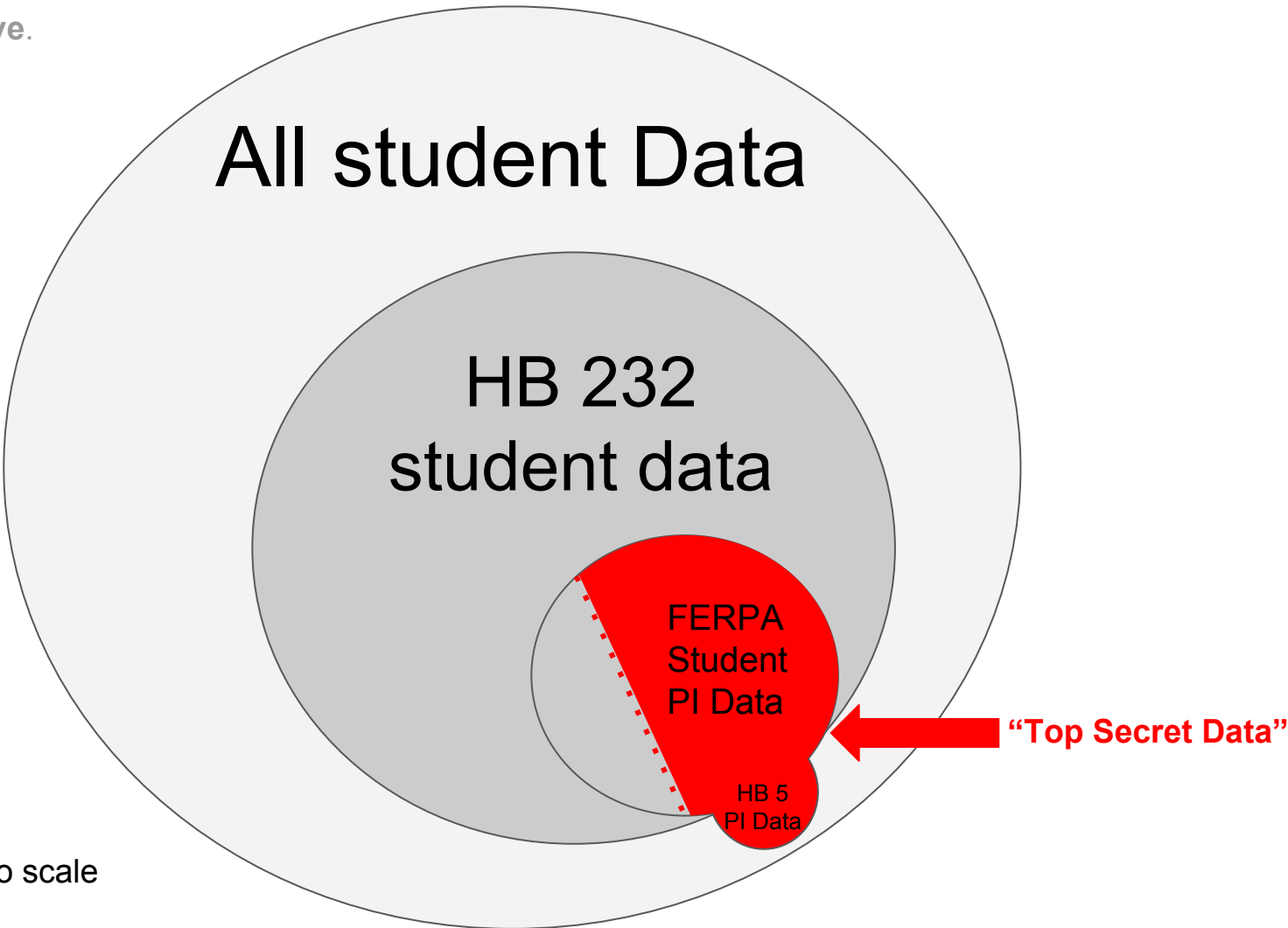
any
of these

Student name
Email Address
Email messages
Postal address
Phone number
Any documents, photos or
unique identifiers relating
to **the student**

Is it data/work of **A** child... or
data/work of THE child?

(A = anonymous)

additional perspective.



*model not drawn to scale

Statutes

<http://www.lrc.ky.gov/statutes/statute.aspx?id=43327> - 365.734 Prohibited uses of personally identifiable student information by cloud computing service provider -- Administrative regulations.

<http://www.lrc.ky.gov/statutes/statute.aspx?id=43576> - 61.932 Personal information security and breach investigation procedures and practices for certain public agencies and nonaffiliated third parties.

<http://www.lrc.ky.gov/statutes/statute.aspx?id=43575> 61.931 Definitions for KRS 61.931 to 61.934.

Some districts.... But not all.



Henry County Online Manual

Welcome to the District's Policy/Procedure Manual!

Chapter

Select a chapter...

Policy

Select a policy...

Procedure

Select a procedure...

This online manual is not an official copy of the school board's official policy/procedure manual. These documents may not contain the most recent changes made by the Board of Education. For an official copy of a policy or procedure, please contact the school district Central Office.

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“the logic model is not an emotional model.”

Goal = consistency

“what is the fastest way to yes?”

....but sometimes it may be a **no**.

Can I use this app?

Is student data/work collected by this app?

Yes

Maybe

No



This go: indicates that the app or service is not collecting any data at all.

Can the data/work be de-identified?

Can this tool be used w/o Stu data/work?

No

Yes

No

Yes



Will the partner sign a data sharing agreement?

No

Yes



Does a crosswalk with Terms of Use & Privacy Policy of Partner align?

No

Yes

GAFE | Code.org



This go: indicates that the app has to collect student data for desired features/functions, **but can** be de-identified as to not represent specific students.

This go: Indicates that the app **can** collect student data but the user/ teacher is choosing to use the app without collecting data

This go: indicates student data is being collected **AND** the app / partner has signed the district agreement

Level 1

Level 2

Level 3
(District Level Process)

Crosswalk Checklist

have to have's in writing (HB 232)

- ☐ A cloud computing service provider shall not process student **data** for any purpose other than providing, improving, developing, or maintaining the integrity of its cloud computing services,
- ☐ may assist an educational institution to conduct educational **research**
- ☐ shall not in any case process student data to advertise or facilitate **advertising**
- ☐ create or correct an individual or household **profile** for any advertisement
- ☐ shall not **sell, disclose**, or otherwise process student data for any commercial purpose.

nice to have's in writing (HB 5)

- ☐ Personally Identifiable Information
- ☐ Data **Disposal**
- ☐ **Breach Notification Time** (24 hr/ 48 hr/ **72 hr**)
- ☐ **Securely** maintaining the data
- ☐ Measures against **unlawful** access
- ☐ **Age**



Crosswalk Checklist

have to have's (HB 232)

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ice to have's (HB 5)

- ☐ it is
- ☐ Data **Disposal**
- ☐ Breach Notification Time (24 hr/ 48 hr/ 72 hr)
- ☐ Fully maintaining the data
- ☐ Measures against **unlawful** access
- ☐ Age



[terms](#) | [privacy](#)



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but...

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Last Updated: June 10, 2015

Our mission at Khan Academy is to provide a free, world-class education for anyone, anywhere.

Khan Academy is a proud supporter of the Student Privacy Pledge to safeguard student privacy.



Khan Academy Privacy Principles

Our Privacy Notice is fueled by our commitment to the following Privacy Principles:

1. We're deeply committed to creating a safe and secure online environment for you.
2. We do not sell your personal information to third parties. We established ourselves as a not-for-profit organization so that our mission of education and your trust will not be in conflict with a for-profit motive.
3. We strive to provide you with access to and control over the information you give us, and we take the protection of your information very seriously.
4. We take extra precautions for our younger learners under the age of 13, including restricting child accounts to automatically block features that would allow a child to post or disclose personal information.
5. We do not advertise on Khan Academy. We use your information to provide you with a better learning experience, not to sell you products.

Sample email to Teachers

This email is to share important information with you regarding Kentucky legislation pertaining to online sharing of student data. It is imperative that our schools look at online tools and resources closely prior to sharing student information or asking students to use apps or websites to ensure we are complying with the law. We must remember there are no “free” apps. The currency for so-called “free” apps may be the data you provide in using the app.

Kentucky law in this instance, defines student data as any of the following:

- Student name
- Email Address
- Email messages
- Postal address
- Phone number
- Any documents, photos or unique identifiers relating to **the student**

Our district has put a process in place to help teachers and schools identify which tools are acceptable to use and under what parameters. A sharepoint page ([hyperlink](#)) has been developed to allow teachers to check to see what online tools have already been approved. If the tool you wish to use is not listed, please contact your STC for further information on how to request approval for a site/app.

While it is our hope that all online partners will meet the state’s legal requirements, we know that not all tools have been designed with education in mind. In some cases, the district will not be able to approve use of tool and expect all teachers to adhere to those decisions.

Teacher Training.....Next Steps... Call to Action



Sample email to Third Party Partners:

As you may know, Kentucky recently passed legislation that requires school districts to have written agreements with any cloud service providers that we may provide **student data and/or student** personally identifiable information (PII) to in the course of using their online products (either paid or free.) The agreements address several areas of concern, including data security and allowable uses of the data by the 3rd party as well as requirements in the event of a data breach.

We highly value the importance of protecting student data, and we have a data sharing agreement that we are asking third party providers to sign in order for us to begin or continue using their products. We are contacting providers to request the signing of this agreement to be kept on file by the district. This agreement will cover the usage of the entire district and all of our students.

If you could help direct this to the appropriate people in your organization and get it returned as soon as possible, we would greatly appreciate it. Our teachers are excited about using your product and we don't want this requirement to stand in the way of that progress.

Thanks for your attention to this matter. Please contact us if you have any questions.






Keeping Track

Data Sharing Agreements


[+ new item](#) or [edit this list](#)

[All Items](#)
[Spreadsheet View](#)
...

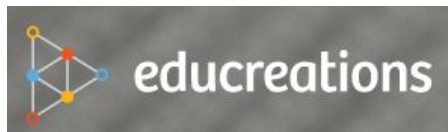
🔍
[SAVE THIS VIEW](#)

✓ Service Provider Name	Agreement Status	Notes	Website or App	Website URL	Company Point of Contact	Point of Contact Email	Keywords	 Date approved
Digital Drivers License DDL	Approved for Use		Web Resource	https://otis.coe.uky.edu/DDL/launch.php	Marty Park	marty.park@education.ky.gov		 August 21, 2015
Dreambox Learning	Approved for Use	Dreambox integrates with Clever, which means student/teacher/course/section data can be automatically imported for your school. Contact Jill Tuttle for more information.	Web Resource	Online math learning	Kimberleigh Dubois	kimberleigh.dubois@dreambox.com		September 18, 2014
ECB (Educational Communications Board - Wisconsin)	Limited Approval - See Notes	Site can only be used as long as students do not log in to save work or track progress.	Web Resource	http://ecb.org/	web form	reading@ecb.org	Wisconsin Media Lab	
eCybermission	Pending Approval		Web Resource	https://www.ecybermission.com/	Sue Whitsett	swhitsett@ecybermission.com		
Edmentum (Plato, Study Island, Reading Eggs, etc.)	Approved for Use		Web Resource	http://www.edmentum.com/	Matt Ferrell	Matt.Ferrell@Edmentum.com		 August 24, 2015
Edmodo	Approved for Use		Both	http://fcpslex.edmodo.com	Ned Levy	ned@edmodo.com		 August 19, 2015
EDpuzzle	Approved for Use		Web Resource	https://edpuzzle.com/	web contact	info@edpuzzle.com		 November 3, 2015

Keeping Track

Service Provider Name *	<input type="text"/>
	<small>Name of the company or website/resource provider</small>
Website or App *	<input checked="" type="radio"/> Web Resource <input type="radio"/> Mobile App <input type="radio"/> Both
Website URL	<small>Type the Web address: (Click here to test)</small> <input type="text"/>
	<small>Type the description:</small> <input type="text"/>
Company Point of Contact *	<input type="text"/>
Point of Contact Email *	<input type="text"/>
Agreement Status *	<input type="radio"/> Approved for Use <input type="radio"/> Not approved for Use <input checked="" type="radio"/> Pending Approval <input type="radio"/> Limited Approval - See Notes
Notes	<input type="text"/>
Keywords	<input type="text"/>
Date approved	<input type="text"/> 

the what.



FITNESSGRAM™



Google for Education



hang ups.

what if the terms/privacy change over time (point in time event)?

the process...

free service versus \$\$ service

what if the answer is not desirable...

data disposal

personal accounts (services) versus organizational accounts (services)

more **resources**

- [Best Practice Guide](#)
- [PII and Data Breach Awareness](#)
- [Data Quality Campaign Student Data Privacy](#)
- [Privacy Policy Browser](#) (Common Sense Education)

<http://www.bluenose.com/wp-content/uploads/2014/09/red-flag.jpg>

http://efdreams.com/data_images/dreams/go/go-04.jpg

<http://blog.powerdnn.com/wp-content/uploads/2012/12/Stop-Button.jpg>