



STUDENT PRIVACY

August 2, 2018



APPLICABLE FEDERAL REGULATIONS

- **FERPA** – right of parent or student over 18 years of age to consent to the disclosure of personally identifiable information
- **PPRA** – affords parents of elementary and secondary students certain rights regarding the conduct of surveys, collection and use of information for marketing purposes, and certain physical exams
- **COPPA** – protects children under 13 years of age from disclosing personal information:
 - First and last name
 - Address
 - Screen or user name that functions as online contact information
 - Telephone number
 - Persistent identifier
 - Photograph, video, or audio file containing child's image or voice
 - Geolocation
 - Combination of information to identify child or parent

FCS BOARD POLICY - JR

- **Directory Information** - July 1, 2018
 - student's name
 - student's address
 - student's photograph;
 - student's grade level;
 - student's date of birth;
 - student's participation in official clubs and sports;
 - weight and height of student if he or she is a member of an athletic team
 - dates of attendance at Forsyth County Schools;
 - degrees, honors and awards received during the time enrolled in Forsyth County School System; and
 - major field of study, enrollment status, and the most recent educational agency or institution attended.
 - *Parent email with permission for school pictures, yearbook sales, and graduation marketing*

Student and Parent Signatures

Student Name: _____ Grade: _____

Home Address: _____

School Name: _____ Homeroom Teacher: _____

YES NO

☐ ☐

Field Trip Permission/Release:

I give permission for my child to participate in field trips during school hours when accompanied by Instructional Staff.

☐ ☐

Publicity and Yearbook/Release:

I give permission for my child to be photographed, interviewed or videotaped for the school or school system. Information may appear in external or school system print and electronic publications, including yearbooks, television and the internet.

☐ ☐

Marketing:

I give permission for my student's name, grade, mailing and email addresses to be provided to vendors for purposes of school photography, yearbook and graduation-related services.

☐ ☐

Survey Release:

I give permission for my child to participate in local and state surveys used to evaluate educational programs and activities.

☐ ☐

Student/Parent Handbook Acknowledgement:

I acknowledge that the Student/Parent Handbook is located in the Student Agenda, where applicable, and/or online for all grade levels. A printed copy is available upon request and is also posted on school websites. I acknowledge that it includes FCS's FERPA Directory Information Notice.

Signing below indicates that I have:

- read the Attendance Notice and am now informed of the possible consequences and penalties associated with violations;
- received the Code of Conduct and received a listing and description of each of the school's clubs and organizations and had an opportunity to deny permission for my child to participate in one or more of the school's clubs and organizations;
- read the Medical Notice;
- read the Field Trip Permission/Release, Publicity and Yearbook Release, Marketing, Surveys Release and Student/Parent Handbook Acknowledgment, and I agree and/or give permission by checking one box per statement;
- agreed that I am the parent/guardian of the child listed above and that the child resides full time at the address noted above.

Student Signature**: _____ Date: _____

Parent/Guardian Signature: _____ Date: _____

*I must immediately notify FCS if I or if the child listed above changes residence. A student enrolled in FCS under falsified information is illegally enrolled and will be immediately withdrawn from school. Falsified information may result in a fine of not more than \$1,000.00 or by imprisonment for not less than one nor more than five years, or both.

**Student signature required for grades 3-12 for Code of Conduct, and for age 10+ for Attendance Notice.

The student above MAY NOT participate in the clubs/organizations listed below:

PARENT CONSENT FOR BOARD POLICY – AT BEGINNING OF THE SCHOOL YEAR


SCHOOL OFFICIAL EXCEPTION

- 4 qualifications must be met when schools want to share student information beyond directory information:
 1. Connected to state curriculum or an educational function/job
 2. Meets security standards
 3. Protected student information is NOT collected
 4. At the end of contract or school year, we make sure student data is deleted.

WHAT APPS AND WEBSITES ARE FERPA SAFE? WHAT APPS NEED ADDITIONAL PARENT PERMISSION?





EDUCATION FRAMEWORK


Kathy Carpenter


Home / Dashboard / Privacy

Dashboard

**130**
DISTRICT APPS

**15**
ACTIVE USERS

**0**
PENDING ASSESSMENTS

**0**
COMPLETED ASSESSMENTS

Pending Assessments

APP NAME

DATE SUBMITTED

No records to display.

1

Page size: 10

0 items in 1 pages

Completed Assessments

APP NAME

DATE COMPLETED

No records to display.

1

Page size: 10

0 items in 1 pages

Dashboard

Apps/Websites

Assign Apps/Websites

Operators


Privacy Quality Scores

Application Approval

Reports

CHECKING SCHOOL BASED APPS

Search for Operator

 Enter operator name to begin search:

Myon

Search

Operator Privacy Quality Scores

Click on operator name to view privacy policy details:

Select Grad... Filter Grades

APP-OPERATOR	PRIVACY SCORE	PRIVACY RATING
Myon	★★★★☆	4 approved

Page size: 10 1 items in 1 pages

Show All Apps

Vendor Responses

View Vendor Responses

Privacy Quality Detail

Myon

Privacy Quality Score = 4

★★★★☆

[View Privacy Policy](#) - 2/17/2017 12:00:00 AM

[View Terms of Use Policy / End User License Agreement](#)

[View Types of Data Used](#)

If parents have agreed that the school may act as the parents agent in the consent process, the school may grant consent on behalf of parents for this app. However, the privacy score indicates there are other risks associated with this app.

[Request Contract](#)

Request improvements from vendor

- ✓ Privacy policy is posted
- ✓ Data used for school purposes only
- ✓ Parents can request deletion of data
- ✗ Parents cannot delete data via online form
- ✓ Student data transfer encrypted
- ✓ Regular data backups are running
- ✗ Data retention not for school purposes only
- ✓ Student data is securely protected

Improvements

Improvements requested from vendor for Myon on 6/13/2018

- Policy does not state that parents can request deletion of student data.
- Policy does not state that student data is encrypted in transit or at rest.
- Policy does not state that data is retained only for education purposes.

Operator Privacy Quality Scores

Search for Operator

☐ enter operator name to begin search:

Evernote

Search

Operator Privacy Quality Scores

Click on operator name to view privacy policy details:

APP-OPERATOR	PRIVACY SCORE	PRIVACY RATING
Evernote	★★★★☆	3.5

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Page size: 10

1 items in 1 pages

Show All Apps

Vendor Responses

View Vendor Responses

EXAMPLE #2

Privacy Quality Detail

Evernote

EVERNOTE

Privacy Quality Score = 3.5

★★★★☆

[View Privacy Policy](#) - 5/25/2018 12:00:00 AM
[View Terms of Use Policy / End User License Agreement](#)
[View Types of Data Used](#)

School district cannot grant consent on behalf of parent for this app. The app operator must obtain consent directly from parents.

[Request Contract](#)

Request improvements from vendor

✓ Privacy policy is posted

✗ Data not used for school purposes only

✓ Parents can request deletion of data

✗ Parents cannot delete data via online form

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(Insert School Letterhead)

Dear Parent(s),

Our class would like to use (Type Website Name Here), an online learning tool that students will use to (Describe Website Purpose Here). In order for students to use this program/service, certain personal information must be provided to the web site operator. Several laws and policies direct our notification to parents and help protect our students online:

Children's Internet Protection Act (CIPA): The school is required by CIPA to have technology measures and policies in place that protect students from harmful materials including those that are obscene and pornographic. Any harmful content contained within inappropriate sites will be blocked.

<http://fcc.gov/cgb/consumerfacts/cipa.html>

Children's Online Privacy Protection Act (COPPA): COPPA applies to commercial companies and limits their ability to collect personal information from children under 13 years of age. No personal student information is collected for commercial purposes.

<http://www.ftc.gov/privacy/coppafaqs.shtml>

Family Educational Rights and Privacy Act (FERPA): FERPA protects the privacy of student education records and gives parents the right to review records. Under FERPA, schools may disclose directory information in certain circumstances.

<http://www2.ed.gov/policy/gen/guid/fpco/ferpa>

Forsyth County Schools Board Policies:

Policy JR - Student Records:

<https://simbli.eboardsolutions.com/ePolicy/policy.aspx?PC=JR&Sch=4069&S=4069&C=J&RevNo=1.84&T=A&Z=P&St=ADOPTED&PG=6&SN=true>

Policy - IFBGE Internet Safety:

<https://simbli.eboardsolutions.com/ePolicy/policy.aspx?PC=IFBGE&Sch=4069&S=4069&C=I&RevNo=1.42&T=A&Z=P&St=ADOPTED&PG=6&SN=true>

In some cases, schools are permitted to consent to the collection of personal information on behalf of parents of students, thereby eliminating the need for individual parental consent given directly to the web site operator. However, for this website parent permission is needed. As a result, Forsyth County Schools is providing you with this notice to provide the needed parent permission.

Please take a moment to look at the website we will be using: (Paste Website URL Here), as well as the website's Terms of Agreement and Privacy Policy which describe what personal information the site collects: (Paste link to Website's Privacy Policy and Terms of Agreement Here).

After reviewing this information, please decide whether or not to provide your student with permission to utilize this web-based tool by completing the last page and returning it to your child's teacher. If you have any questions, please feel free to contact, (Insert the teacher's name and contact information).

Sincerely,

PARENT PERMISSION

(Insert School Letterhead)

Web App Parent Permission Slip

I have read the information provided regarding the use of (Type Website Name Here) in my child's school.

____ YES, I give permission for my child to use (Type Website Name Here) to enhance his/her learning experience.

____ NO, I do not give permission to use (Type Website Name Here) to enhance his/her learning experience.

Student Name (Please Print): _____ Teacher's Name: _____

Student Signature: _____

Parent/Guardian Signature: _____

Date: _____

MEMORANDUM OF UNDERSTANDING (MOU)

- When contracting with a vendor to provide a service, you can use a MOU.
- *Conditions:*
 - *Students are not putting in information into a web-based application.*
 - *Student information is being transferred from FCS to a vendor for the purpose of executing a school based service.*
- *Examples:*
 - *Yearbook companies*
 - *My Payments Plus*
 - *Multi-criteria assessments for program qualifications*



SUMMARY

- Check Education Framework when assessing new web-based resources for students.
- Help schools remember to check their self selected web-based resources.
 - Are we supporting making solid choices for supporting curriculum?

RESOURCES

- <https://studentprivacy.ed.gov/>
- <https://www.ftc.gov/tips-advice/business-center/privacy-and-security/children%27s-privacy>
- <http://www.cosn.org/about/news/cosn-issues-k-12-privacy-toolkit-school-leaders>