

Checklist for Developing School District Privacy Programs

About PTAC

The U.S. Department of Education established the Privacy Technical Assistance Center (PTAC) as a “one-stop” resource for education stakeholders to learn about data privacy, confidentiality, and security practices related to student-level longitudinal data systems and other uses of student data. PTAC provides timely information and updated guidance through a variety of resources, including training materials and opportunities to receive direct assistance with privacy, security, and confidentiality of student data systems. More PTAC information is available at <https://studentprivacy.ed.gov>.

This document was developed by the Privacy Technical Assistance Center (PTAC) as a companion piece to the video *Developing a Privacy Program for Your School District*. The video, along with other helpful resources related to safeguarding the privacy of education data, can be found at <https://studentprivacy.ed.gov>.

Why does your district need a student privacy program?

A student privacy program helps districts meet legal and ethical requirements for protecting personally identifiable information in student education records. An effective district privacy program

- ✓ protects students from harm (e.g., identity theft, discrimination, predatory activity); and
- ✓ protects the district from harm (e.g., loss of public confidence, administrative burden of investigating a breach, alienating parents, financial loss).

In addition, a privacy program improves the efficiency of district decision-making and operations regarding data collection, dissemination, and use. It also helps improve communication and transparency with parents and students about data practices, and reassures parents and students about the security of their personal information.

What is a student privacy program?

A student privacy program is a set of policies and procedures, roles, and responsibilities designed to help districts

- ✓ keep students' personal information safe;
- ✓ comply with privacy laws; and
- ✓ protect both students and districts from harm resulting from unauthorized disclosure of private information.

Developing a school district privacy program does not require significant resources. Most districts probably have parts of a program already in place, such as an “Acceptable Use Policy” for student data systems. An effective privacy program does not necessarily require a designated full-time staff, as protecting privacy is everyone’s responsibility. However, at least one person should be responsible for coordinating privacy efforts and policies as part of his or her job requirements.

How does a district create a student privacy program?

- ✓ Get leadership to acknowledge the need for a program.
- ✓ Bring the right people to the table (users and managers of student information, such as data managers, IT staff, school administrators) and work with, or form, your data governance committee to determine what policies and procedures are already in place.
- ✓ Have a designated individual responsible for policies relating to data use and privacy.
- ✓ Determine which policies and procedures are already in place.
- ✓ Adopt any additional necessary policies and procedures for the use of student data throughout the data life cycle, including consequences for non-compliance.
- ✓ Develop a monitoring plan to ensure policies and procedures are being followed.
- ✓ Train data users on relevant policies and procedures.
- ✓ Think about how best to be transparent to parents and students about privacy, including putting helpful information on your website.

Where can you go for help?

The U.S. Department of Education's Privacy Technical Assistance Center (PTAC) has numerous free resources available online at <https://studentprivacy.ed.gov>. Topics include security best practices (such as data destruction and responding to data breaches), data governance (including transparency best practices and data stewardship), data sharing, and disclosure avoidance. For individualized help, email PrivacyTA@ed.gov.