

LEA Name: PROMONTORY SCHOOL OF EXPEDITIONARY LEARNING

Review Date: 24-Oct-2019; 31-Jan-2020 (updated annual, directory, governance to pass)

Evidence #1 and #2: Name and contact info of Data Manager / Information Security Officer

Status: **PASS**

Evidence #3: Annual FERPA Notice

Status: **PASS**

Expected elements

- Parent rights and procedure for following rights
- Definition of school official

31-Jan-2020: [Document](#) meets all requirements

The document shared is the directory information notice. It does not meet the requirements of the annual notice.

Recommendation: Use the [template](#) to create the notice

Evidence #4: Directory Information Notice

Status: **PASS**

Expected elements

- Types of items designated as directory information -
- Process for opting out of directory information -
- Timeline for opting out of directory information -

31-Jan-2020: [Document](#) meets all requirements

[Document](#) meets most of the requirements. The notice needs to explain the timeline for opting out. Most LEAs give parents sometime within the first 2 to 4 weeks of the school year to opt out.

Note that directory information is intended to be an opt out. There is no need for a parent to sign a form acknowledging that they are fine with the school disclosing directory information. In fact, this may lead to confusion (e.g., a parent might think that not returning the form signed is the same as opting out).

Also note that there are several additional data elements you could designate as directory information:

- address
- date/place of birth
- dates of attendance
- participation in official activities/sports
- weight/height of student athletes
- most recent educational institution attended
- student ID number

Whereas several of these may not apply due to your student population and though you are not required to designate these as directory information, you may want to consider doing so in order to ensure that your notice reflects actual practice. If student birthdays are announced or celebrated, this also generally occurs with the directory exception. If the school is concerned about these data elements being overly exposed, then you may want to consider using a limited directory information policy, as described in [34 CFR §99.37\(d\)](#).

Recommendation: Add the timeline for opting out. Consider adding data elements as directory information and using a limited directory information policy.

Evidence #5: Data Collection Notice

Status: **PASS**

Expected elements

- Prominent, standalone document, posted on website -
- States student data that are collected -
- States prohibited data collections -
- Includes the exact statement regarding benefits, risk, and choice -
- Describes in general how the LEA protects student data -
- States student rights under the student data protection act –

[Document](#) meets all requirements

Evidence #6: Data Governance Plan

Status: **PASS**

Expected elements

- Incorporate reasonable data industry best practices to maintain and protect data (i.e., adopt a cybersecurity framework) -
- Describe roles and responsibilities -
- Provide for technical assistance, training, support, and auditing - pass
- Describe the process for sharing student data - pass
- Describe the expungement process -
- Describe the data breach response process - pass
- Posted on website

31-Jan-2020: [Document](#) meets all requirements

The [document](#) contains most of the required elements, though some are missing. Partial credit was given for the expungement policy, but note that there have been changes to statute and board rule, so this should be modified.

Recommendation: Use the latest [template](#) to draft the policies.