

INDEPENDENT SCHOOL DISTRICT 196
Rosemount-Apple Valley-Eagan Public Schools
Educating our students to reach their full potential

Series Number 505.1AR Adopted January 1985 Revised April 2015

Title **Educational Data: Plan for Administering Data**

1. **Responsible Authority** - As responsible authority for the maintenance and security of student records for District 196, the superintendent designates:
 - 1.1 School principals/program coordinators as the responsible authority for educational data maintained in schools, including cumulative records and child study records;
 - 1.2 The director of special education as the responsible authority for child study student records maintained in the District Office, and
 - 1.3 Student Information as the responsible authority for student records maintained at the District Office.
2. **Data Practices Compliance Official** - The school district attorney shall act as the school district's data practices compliance official and as such shall be the person to whom questions or concerns are directed regarding problems in obtaining access to data or other data practices problems.
3. **Educational Data and Authorizing Statutes** - The types of District 196 educational data and authorizing statutes are listed in District Procedure 505.1.3.1P, Student Record Systems and Authorizing Statutes. The list shall be released to members of the general public upon request. The list shall be updated when new or different types of data, storage, use or dissemination are authorized.
4. **Need for Data**
 - 4.1 The educational data listed in District Procedure 505.1.3.1P, Student Record Systems and Authorizing Statutes, shall be maintained in perpetuity except when eligible subjects of special education data request destruction following District Procedure 505.3.1P, Public Notice – Annual Notification of Rights, Protection and Privacy of Student Records.
 - 4.2 District employees, working under the supervision of a responsible authority and entering educational data into the records of individuals, shall enter data that is:
 - 4.2.1 "Accurate," meaning that the data is reasonably free from error;
 - 4.2.2 "Complete," meaning that the data reasonably reflects the history of the student's or former student's transactions with the school district, and that omissions in a student's educational history which would place the student or former student in a false light are not permitted, and
 - 4.2.3 Data shall be considered "current" providing that it accurately and completely reflects information regarding a student's education in District 196, thereby assuring that the district's day-to-day operation of maintaining historical records is being carried out.

5. **Necessity for Data Listed in District Procedure 505.1.3.1P** -- The data listed in District Procedure 505.1.3.1P, Student Record Systems and Authorizing Statutes, needs to be maintained based on the following criteria.
 - 5.1 The particular data is required to carry out programs that are expressly or implicitly authorized by provision of state statute, federal law or School Board policy.
 - 5.2 The district would incur undue burden and expense in fulfilling its duties under Minnesota Statute 138.17 if the data were not collected and stored in perpetuity, except as provided for in section 4.1 above.
 - 5.3 Educational data must be maintained in perpetuity in the event that a legal action is brought against District 196, except as provided for in section 4.1 above.
 - 5.4 Retention of certain records for certain time periods is essential to comply with federal statute, 20 U.S.C. § 1400 et seq. (Individuals with Disabilities Education Act); 20 U.S.C. § 6301-6682 (Title I) and Minnesota Statute 138.17, Government Records; Administration.
6. **Unneeded Data** - When the district determines that certain kinds of data no longer needs to be gathered and entered into a student's records, the district will take the following action.
 - 6.1 Take appropriate steps to modify data collection procedures to assure that unnecessary data is not gathered and disseminated. Private data that has been entered into a student's record will be disseminated upon request of the data subject's parent or the data subject at age 18 or older.
 - 6.2 If it is necessary and appropriate to dispose of data, such disposal will be carried out according to the provisions of the Minnesota Records Management Act.

References: - Minnesota Statute 13.05, Duties of responsible authority
- Minnesota Administrative Rule 1205.1500, Duties of responsible authority in administering all entity data