

Addendum A

PARENTS' BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY

The Phelps-Clifton Springs Central School District is committed to protecting the privacy and security of student, teacher and principal data. In accordance with Education Law § 2-d, the District wishes to inform the school community of the following:

1. A student's personally identifiable information cannot be sold or released for any commercial purposes;
2. In accordance with FERPA, Section 2-d and Board Policies, parents have the right to inspect and review the complete contents of their child's education record;
3. State and federal laws protect the confidentiality of personally identifiable information and safeguards associated with industry standards and best practices, including but not limited to, encryption, firewalls, and password protection, must be in place when data is stored or transferred.
4. The New York State Education Department collects a number of student data elements for authorized uses. A complete list of all student data elements collected by the State is available for public review from the State Education Department. Websites and mailing addresses will be made public when they become available.
5. Parents have the right to have complaints about possible breaches of student data addressed by submitting a complaint in writing, to: Lydia Schadler, 1490 State Route 488, Clifton Springs, NY 14432.

The information above is provided while the District awaits further guidance from the State Education Department regarding data privacy and security issues. This document should not be considered a full and final parents bill of rights.

Addendum B

PARENTS' BILL OF RIGHTS – SUPPLEMENTAL INFORMATION ADDENDUM

1. **EXCLUSIVE PURPOSES FOR DATA USE:** The exclusive purposes for which “student data” or “teacher or principal data” (as those terms are defined in Education Law Section 2-d and collectively referred to as the “Confidential Data”) will be used by [insert name of third-party contractor] (the “Contractor”) are limited to the purposes authorized in the contract between the Contractor and [insert name of school district] (the “School District”) dated [insert contract date] (the “Contract”).
2. **SUBCONTRACTOR OVERSIGHT DETAILS:** The Contractor will ensure that any subcontractors, or other authorized persons or entities to whom the Contractor will disclose the Confidential Data, if any, are contractually required to abide by all applicable data protection and security requirements, including but not limited to those outlined in applicable state and federal laws and regulations (e.g., Family Educational Rights and Privacy Act (“FERPA”); Education Law §2-d; 8 NYCRR Part 121).
3. **CONTRACT PRACTICES:** The Contract commences and expires on the dates set forth in the Contract, unless earlier terminated or renewed pursuant to the terms of the Contract. On or before the date the Contract expires, protected data will be exported to the School District in [insert data format] format and/or destroyed by the Contractor as directed by the School District.
4. **DATA ACCURACY/CORRECTION PRACTICES:** A parent or eligible student can challenge the accuracy of any “education record”, as that term is defined in the FERPA, stored by the School District in a Contractor’s product and/or service by following the School District’s procedure for requesting the amendment of education records under the FERPA. Teachers and principals may be able to challenge the accuracy of APPR data stored by School District in Contractor’s product and/or service by following the appeal procedure in the School District’s APPR Plan. Unless otherwise required above or by other applicable law, challenges to the accuracy of the Confidential Data shall not be permitted.
5. **SECURITY PRACTICES:** Confidential Data provided to Contractor by the School District will be stored [insert location]. The measures that Contractor takes to protect Confidential Data will align with the NIST Cybersecurity Framework including, but not necessarily limited to, disk encryption, file encryption, firewalls, and password protection.
6. **ENCRYPTION PRACTICES:** The Contractor will apply encryption to the Confidential Data while in motion and at rest at least to the extent required by Education Law Section 2-d and other applicable law.

Addendum D

TECHNICAL SPECIFICATIONS

For Auditing Purposes:

Is personally identifiable information (PII) collected and/or transmitted over the Internet (e.g., via an online/web/cloud application)? **If yes, who is responsible for managing the collection and transmission of that information?**

Is personally identifiable information (PII) encrypted when stored and transmitted? **If yes, what type of encryption is used for each (i.e., storage and transmission)?**

Technical Specifications

Addendum E

VENDOR'S DATA SECURITY AND PRIVACY PLAN

Addendum F
SCHEDULE OF DATA

Category of Data	Elements	Check if used by your system
Application Technology Meta Data	IP Addresses, Use of cookies etc.	
	Other application technology meta data Specify:	
Application Use Statistics	Meta data on user interaction with application	
Assessment	Standardized test scores	
	Observation data	
	Other assessment data (specify): <i>Student Personality Assessments</i>	
Attendance	Student school (daily) attendance data	
	Student class attendance data	
Communications	Online communications that are captured (emails, blog entries)	
Conduct	Conduct or behavioral data	
Demographics	Date of Birth	
	Place of Birth	
	Gender	
	Ethnicity or race	
	Language information (native, preferred or primary language spoken by student)	
	Other demographic information Specify:	
Enrollment	Student school enrollment	
	Student grade level	
	Homeroom	
	Guidance counselor	
	Specific curriculum programs	
	Year of graduation	
	Other enrollment information (specify):	
Parent/Guardian Contact Information	Address	
	Email	
	Phone	
Parent/Guardian ID	Parent ID number (created to link parents to students)	
Parent/Guardian Name	First and/or Last	
Schedule	Student scheduled courses	

Category of Data	Elements	Check if used by your system
	Teacher names	
Special Indicator	English language learner information	
	Low income status	
	Medical alerts	
	Student disability information	
	Specialized education services (IEP or 504)	
	Living situations (homeless/foster care)	
	Other indicator information(specify): <i>First Generation College Student</i>	
Student Contact Information	Address	
	Email	
	Phone	
Student Identifiers	Local (School district) ID number	
	State ID number	
	Vendor/App assigned student ID No.	
	Student app username	
	Student app passwords	
Student Name	First and/or Last	
Student In-App Performance	Program/application performance (typing program-student types 60 wpm, reading program-student reads below grade level)	
Student Program Membership	Academic or extracurricular activities a student may belong to or participate in	
Student Survey Responses	Student responses to surveys or questionnaires	
Student work	Student generated content; writing, pictures etc.	
	Other student work data Please specify:	
Transcript	Student course grades	
	Student course data	
	Student course grades/performance scores	
	Other transcript data Please specify:	
	Student bus assignment	

Category of Data	Elements	Check if used by your system
Transportation	Student pick up and/or drop off location	
	Student bus card ID number	
	Other transportation data Please specify:	
Other	Please list each additional data element used, stored or collected by your application	

