

# **ROBERTSON COUNTY SCHOOLS**

## **SOFTWARE AND ONLINE RESOURCES APPROVAL PROCESS**



# What is COPPA?

“The Children’s Online Privacy Protection Act (COPPA) gives parents control over what information websites can collect from their kids.”

[Federal Trade Commission](#)  
[What is COPPA Video](#)



# Websites Covered by the COPPA Rule Must:

- Post clear and comprehensive child online privacy policies
- Provide direct notice to parents and obtain verifiable parental consent
- Give parents the choice of consenting to the operator's collection, but prohibiting the operator from disclosing that information to third parties
- Provide parental access for child's personal information
- Give parents opportunity to prevent further use or online collection of a child's personal information
- Maintain the confidentiality, security, and integrity of information they collect from children
- Retain personal information collected only as long as is necessary to fulfill the purpose for which it was collected

# What is Considered Personally Identifiable Information?

- First and last name
- A home or other physical address including street name and name of a city or town
- Online contact information
- A screen or username that functions as online contact information
- A telephone number
- A social security number
- A persistent identifier that can be used to recognize a user over time and across different websites or online services;
- A photograph, video, or audio file, where such file contains a child's image or voice;
- Geolocation information sufficient to identify street name and name of a city or town; or
- Information concerning the child or the parents of that child that the operator collects online from the child and combines with an identifier described above.



# Class Dojo Example

## ClassDojo's Privacy Certifications



ClassDojo participates in the iKeepSafe Safe Harbor program. iKeepSafe has granted ClassDojo the COPPA Safe Harbor seal signifying its Website, Platform, and Apps have been reviewed and approved for having policies and practices surrounding the collection, use, maintenance and disclosure of **personal information** from children are consistent with the iKeepSafe COPPA Safe Harbor program guidelines.

ClassDojo holds the iKeepSafe FERPA Certification. Our Website, Platform, and Apps have been reviewed and approved for having policies and practices that are compliant with the federal mandates for FERPA.

ClassDojo is also a signatory to the Student Privacy Pledge. We agree to a set of principles intended to safeguard student privacy, including responsible stewardship, protection, and transparent handling of student personal information. Read more about the Student Privacy Pledge [here](#).

For more information about COPPA and generally protecting children's online privacy, please visit [OnGuard Online](#).

Basically,

ClassDojo is certified **COPPA-compliant**, has a certification stating that its policies and practices help schools meet their FERPA obligations, and has also signed the **Student Privacy Pledge**.

# Seesaw Example

We comply with FERPA, COPPA, GDPR, MFIPPA, and the Australian Privacy Act. We have also signed the [National Data Privacy Agreement](#) and the [Student Privacy Pledge](#) so you can feel comfortable using Seesaw in the classroom.

# Example of Non-COPPA Compliance

## **CHILDREN**

Our Sites are not intended for or directed toward children under 13 years of age nor does A+E Networks knowingly collect or store personal information on our Sites from children under 13. If you are under 13 years of age, you are not permitted to submit any personal information to us on any Site, and if we become aware that we have inadvertently received personal information from a visitor under the age of 13, we will delete that information from our records.

# How to Check for Compliance

## Step 1: Search

- Use your computer or phone to search a web resource that requires your students to sign into an account.
- Add the words “terms of service” and/or “privacy policy” to your search.





# How to Check for Compliance

## Step 2: Analyze

- Once on the privacy policy and/or terms of service, search that site for these keywords:
  - 13
  - 18
  - Parent
  - Permission
  - Guardian



# How to Check for Compliance

## Step 3: Questions to Consider:

- Are there age restrictions?
- Who is responsible for compliance?
- Are there special requirements for compliance?



# Purpose of the Vetting Process



# COPPA and SCHOOLS

**Who should provide consent – an individual teacher, the school administration, or the school district?**

"As a best practice, we (the FTC) recommend that schools or school districts decide whether a particular site's or service's information practices are appropriate, rather than delegating that decision to the teacher. Many schools have a process for assessing sites' and services' practices so that this task does not fall on individual teachers' shoulders."

# COPPA and SCHOOLS

**Can an educational institution consent to a website or app's collection, use or disclosure of personal information from students?**

- School may provide consent if data is used for educational purposes only and if the PII released falls within FERPA guidelines



# **What Does the FTC Say About COPPA and SCHOOLS**

## **When the school gives consent, what are the school's obligations regarding notifying the parent?**

- Providing parents with a notice of the websites and online services whose collection it has consented to on behalf of the parent
- Make privacy policies available to parents online
- Implement Acceptable Use Policies for Internet use (AUPs) to educate parents and students about in-school Internet use. The school maintains this information on a website or provide a link to the information at the beginning of the school year

# How is the Robertson County School District Addressing COPPA and Protecting Teachers and Students?



# Addressing COPPA

- Gathering information from teachers regarding online tools used – Microsoft Form
- Researching online tools to ensure compliance
- Creating a list of resources that meet COPPA regulations
- Incorporating parent permission into student registration through our *Acceptable Use Policy*



# How to Submit a Resource for Vetting

Step 1: Navigate to the Technology Homepage on rcstn.net





# How to Submit a Resource for Vetting

Step 2: Check the "Software and Online Resources Approval List"

Step 3: Click on the link to go to the Form to submit your request

The screenshot shows a web page titled "TECH TABS" with a navigation bar containing "Self-Help Resources", "Tech Forms", and "Internet Safety". The "Self-Help Resources" tab is active. The page content includes sections for "Classlink Help", "Microsoft 365 Help", and "Parents & Students". The "Software and Online Resources" section is highlighted with a red circle and the number 2. Below this section, there are two links: "Software and online resources approval process Powerpoint" and "Software and Online Resources Approval List". A red circle with the number 3 and an arrow points to the "Software and Online Resources Approval List" link.

**TECH TABS**

**Self-Help Resources** Tech Forms Internet Safety

**Classlink Help**  
[Changing Your Password Using ClassLink](#)

**Microsoft 365 Help**  
[Changing Your Password Using Your Office 365 Account](#)  
[Office 365 Training Center](#)  
[Click here](#) for a handout with directions for logging in to your Office 365 Account.  
After reading the directions, [click here](#) to login to your account and get started using the online Office tools to share and collaborate with others.

**Parents & Students**  
[Changing Your Office 365 Password Instructions for Students](#)

**Software and Online Resources**  
Software and online resources approval process Powerpoint  
[Software and Online Resources Approval List](#)



# Software and Online Resources Vetting

**Before using or purchasing any software or online resource:**

1. Check the Software and Online Resources Approval Status List on the RCS Technology web page to see if this resource has already been vetted and approved/denied.
2. If you don't see it on the list, please complete the request form on the RCS Technology web page **prior to purchasing or using** online/software resources. In other words, if you must create an account, login or download software to use a resource, this form should be submitted to Technology to request vetting FIRST.

**Please be aware that if approved, you will be responsible for securing funding for the resource should that be necessary.**

# What Happens Next?

1. The request form is received by Technology and the vetting process begins.
2. The resource will be "Approved" or "Not Approved" for use in Robertson County Schools.
3. An email will be sent to the requester and copied to the principal.
4. The requestor can then move forward if the resource has been approved.



# Partnering with Parents and COPPA

Be transparent:

- Build trust by proactively communicating which effective technology tools are used in classrooms
- Share how you protect student data
- Provide links to websites and privacy policies

# References

Federal Trade Commission- [Complying with COPPA: Frequently Asked Questions | Federal Trade Commission \(ftc.gov\)](#)

Jeffco Public Schools- [Privacy Practices for Student Data - Jeffco Public Schools](#)