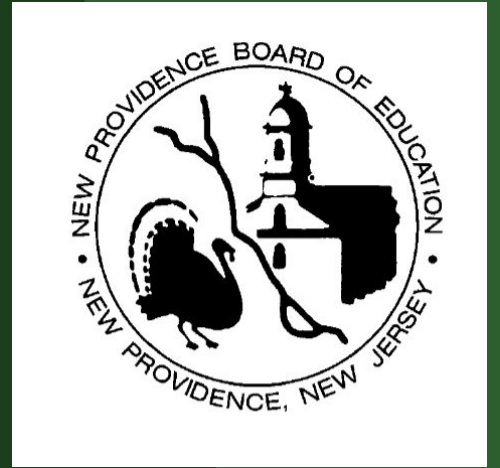




STUDENT DATA PRIVACY & Cloud Services

How the District Safeguards Student Information in an Increasingly Cloud-Based Learning Environment

Board of Education Presentation | August 31 2026

THE QUESTION WE'RE ANSWERING TONIGHT:

How does the district protect student data and student records?



Federal Law

FERPA and COPPA set the legal floor for how student data must be handled.



A Vetting Process

Cloud tools are reviewed and providers may sign a data privacy agreement (DPA).



A Retention Plan

We are documenting student data retention and building a process to delete it.

Two Laws Govern Every Decision We Make



FERPA

Family Educational Rights and Privacy Act

- Protects the privacy of student education records
- Limits disclosure of personally identifiable information
- Permits approved vendors to receive data under specific conditions
- Requires safeguards governing access, use, and redisclosure



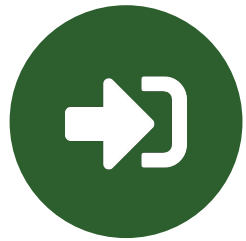
COPPA

Children's Online Privacy Protection Act

- Enforced by the Federal Trade Commission; protects children under 13 online
- Regulates how vendors collect, use, and disclose children's information
- Schools may consent on behalf of families for authorized educational purposes
- Student information cannot be used for unrelated commercial purposes

How Students Access Cloud-Based Tools

What is a cloud-based tool? Software programs that are run over the internet using a web browser



**Student
Signs In**



**Google
Clever**



**Roster Data Passes
Through Clever**

(name, email, grade, dob, etc...)

Examples students use often:



NoRedInk

Writing & grammar practice



iReady

Adaptive reading & math



**Google Workspace for
Education**

Docs, Slides, and email



What is Clever? A rostering and single sign-on service for students and staff. Clever has Data Sharing Agreements (DSA) in place with each cloud service provider to legally bind vendors to data security best practices.

WHERE WE STARTED

Our Old Process



700+

apps/cloud-based services
accumulated over the years

How a tool was approved:

1

Instructional Approval

Department head of the instructional area approves the tool for classroom use.

2

Privacy Review

Department head of technology reviews the vendor's privacy agreement for FERPA/COPPA compliance.

3

Approved for Use

The cloud-based service is cleared for student use.

Our New Process: After Joining the NJSPA & SDPC



NJSPA

New Jersey Student Privacy Alliance

Currently 33 NJ Districts benefit from the use of existing (DPAs) data privacy agreements negotiated by the SDPC that serves members across 14 states.



SDPC

Student Data Privacy Consortium

Provides tools and resources to address operational issues around student data privacy in MA, ME, IL, IA, MO, NE, NH, NJ, NY, OH, RI, TN, VT, and VA.

The SDPC:

- Provides legal and operational support to produce signed DPAs between districts and Cloud Services providers
- Establishes common expectations for districts and cloud service providers around student data privacy
- Provides DPA templates with federal and New Jersey-specific privacy requirements
- Establishes data security requirements via the DPA
- Provides NJ and national searchable databases of DPAs
- Supports our goals of securing student data, transparency, and accountability

What Is a Data Privacy Agreement?



A DPA is legally binding and signed by both the vendor and the district

Every agreement we sign:

- Establishes the “school official” relationship between the school and the provider
- Establishes school control over the student data held by the provider
- Explicitly details the cloud service provider’s allowed uses of the student data
- Details requirements for cybersecurity, a process for data deletion, and data breach notification
- Specifies pertinent Federal and New Jersey law

Source: A4L Learning Community

EVERY DPA GUARANTEES

The Ground Rules



Data Security

Vendors commit to data security best practices.



No Data Selling/Sharing

Vendors are legally obligated to not sell/share student data to third parties.



No Ads

Cloud-based Services cannot show advertisements to students.

How Teachers Know What's Approved

1



Search the SDPC Registry

Before using a tool, teachers check the database to see if it's approved.

2



Not Listed? Request It

If a service isn't in the database, teachers may request it.

3



Only Approved Tools

Only cloud-based services that have cleared review are made available to students.



A note on Apple School Manager, Google Workspace for Education, & Adobe: the providers of these products/services don't sign DPAs. That doesn't preclude their use — each maintains its own public-facing privacy agreement for schools, which we have reviewed for DPA fundamentals and FERPA/COPPA compliance.

SUMMER 2026 AUDIT PROGRESS

Progress to Date

700+ → 244

Apps/Cloud-based services
audited and reduced

213

Data Privacy Agreements or other

31

DPAs still in the SDPC pipeline

Vendor Review in Action



Albert.io

Approved — AP exam review materials, DPA on file



PhET Interactive

Approved Other— No Data Collected



Duolingo

Declined — vendor would not sign the DPA

LOOKING AHEAD

What's Next: Data Retention & Deletion Schedule



A signed DPA governs a vendor's use of our student data — the next step is building documentation and process around our stewardship of that data - our goal is to retain data that serves an educational purpose, for only as long as needed

We Are:

- Reviewing what student personal information (PI) is collected by approved vendors
- Building retention/deletion schedules for student PI in the cloud
- Reviewing the length of time we keep longitudinal data for multi-year student growth tracking
- Developing a process to request data deletion when a DPA is terminated and before

KEY TAKEAWAYS

Protecting Students Is an Ongoing Commitment

- 1 We follow the law.** FERPA and COPPA guide every vendor decision we make.
- 2 We joined a strong alliance:** The SDPC provides vetted DPAs and shared district strength.
- 3 We audited our footprint.** 700+ services trimmed to 244, with 213 approved cloud-based services.
- 4 We're building for the future.** A retention and deletion process is underway for all cloud data.

Thank you!
Questions & Dialogue

[Supplemental Slides](#)