DATA SHARING AGREEMENT

between

PACIFIC LUTHERAN UNIVERSITY

and

NORTH THURSTON PUBLIC SCHOOLS

This Data Sharing Agreement is entered into by and between **PACIFIC LUTHERAN UNIVERSITY,** a Washington nonprofit corporation (the University) and **NORTH THURSTON PUBLIC SCHOOLS** (School District) to establish the content, use, and protection of data needed by School District to support the contracted service, whether such data is provided by University or collected by School District on behalf of the University as of the 5th day of October, 2021.

1. **Period of Agreement**

   The period of this Agreement shall be in effect from **October 5, 2021** until terminated in writing by either organization.

2. **Intended Use of Data**

   Data will be used to administer the University Guaranteed Admission Program.

3. **Constraints on Use**

   Data supplied by the School District and shared with the University shall not be sold or used, internally or externally, for any purpose not directly related to the scope of work defined in this agreement without the written permission of the School District.

   School District recognizes that 34 C.F.R.99.30 requires prior written consent of the data subject prior to the release of personally identifiable information (PII) from student's educational records. School District shall not release PII to the University without prior written consent of the parent/guardian or student (if student is at least 18 years old) except in cases that constitute exceptions to the consent requirements of the FERPA. School Districts are responsible for obtaining a written consent form that specifies the records that may be disclosed, the purpose of the disclosure, and to whom the disclosures will be made.

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4. Data Security

School District and University shall employ industry best practices, both technically and procedurally, to protect the School District data from unauthorized physical and electronic access. Methods employed are subject to annual review and approval by the University.

4.1. Data Elements

Data shared with the University shall be limited to the data elements specifically defined and authorized by the School District.

Data to be shared or collected shall be limited to the following elements: See Exhibit A.

4.2. Data Categories

The following definitions shall be used to classify data for security purposes:

Public: The least restrictive class of data. Although it must be protected from unauthorized disclosure and/or modification, it is often public information or generally releasable under the University procedures for processing public records requests. Examples of this class of data are: class schedules, course catalogs, general ledger data, and employee demographic statistics.

Private: This class includes data for which specific protections are required by law or for which agencies are obligated to prevent identity theft or similar crimes or abuses. Examples of this class are: peoples' names in combination with any of the following: birth date, student or employee ID number, address, e-mail addresses, telephone numbers. Also included are: education records including papers, grades, and test results, or information identifiable to an individual that relates to any of these types of information.

Restricted: This class includes those data elements that are either passwords in the traditional sense of function in the role of an access control such as a credit card number, expiration date, PIN, and card security code. All data classified as Restricted shall be encrypted in storage and in transit. Access to these elements are tightly controlled and audited. Examples of these data are: Social Security Numbers (SSN), driver's license number, credit card numbers, expiration dates, PINs, card security codes, financial profiles, bank routing numbers, medical data, and law enforcement records.

4.3. Data Handling Requirements

Data handling requirements may vary depending on the classification of data shared with the University. However, it is anticipated that most data shared with the University will involve a mix of data classes including Private and possibly Restricted information. Therefore, whenever data elements are aggregated for collection, transmission, or storage, the aggregate data shall be handled using the protocols that apply to the most sensitive data element.

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5. Network Security

5.1. Internet Access

Connections to University computers utilizing the Internet, whether from client access or remote administration, must be protected using any of the following industry standard cryptographic technologies: TLS, IPSec, SSH/SCP, PGP.

5.2. Data Storage

Regardless of the media employed (i.e., disk, tape, etc.), Restricted data must be stored in an encrypted format. Encryption algorithms shall be AES-128 or better, or Triple-DES (TDEA). The use of other encryption algorithms for data storage must be approved in writing by the University.

6. **Compliance with Applicable Laws and Regulations**

School District shall comply with all applicable federal laws and regulations protecting the privacy of citizens including the Family Educational Rights and Privacy Act (FERPA), the Health Insurance Portability and Accountability Act (HIPAA), Gramm Leach Bliley Act (GLBA) and General Data Protection Regulation (GDPR).

7. **Amendments and Alterations to this Agreement**

The University and School District may amend this Agreement by mutual consent, in writing at any time.

THIS AGREEMENT, consisting of 4 pages, and 1 exhibit(s), is executed by the persons signing below who certify that they have the authority to execute this Agreement.

NORTH THURSTON PUBLIC SCHOOLS

Address: 305 College Street NE
Lacey, WA 98516

Contact: Dr. Debra Clemens

Title: Superintendent

Telephone: 360-412-4413

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E-mail: dclemens@nthurston.k12.wa.us

Signature: Debra J. Clemens

Date: 10/5/2021

PACIFIC LUTHERAN UNIVERSITY, a Washington nonprofit corporation

Address: 12180 Park Avenue South
Tacoma, WA 98447

Contact: Patrick D. Gehring

Title: Associate Vice President for Finance

Telephone: (253) 535-7121

Fax: (253) 536-5047

E-mail: fadmin@plu.edu

Signature:

Date: 10.14.21

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EXHIBIT A

Student First Name
Student Last Name
Student Date of Birth
Student Mailing Address
Student Phone Number
Student Email Address
Parent or Guardian Name
Parent or Guardian Mailing Address
Parent or Guardian Phone Number
Parent or Guardian Email Address
High School
Unweighted GPA
Class ranking
Class ranking by percentage of graduating class
Transcripts
Course taking details such as course coding (e.g., Honors, dual credit)
Race
Ethnicity
Free and reduced-price lunch eligibility

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