



Trusted Learning Environment Seal Practices and Examples of Evidence

Leadership Practices

1. The deliberations and decisions of school system leaders reflect an understanding of data privacy and security.

Example of Evidence: Agendas and/or minutes from school leadership meetings demonstrating that groups such as a school system governing board, superintendent's cabinet or other leadership groups regularly engage in thoughtful discussions about school system compliance with FERPA, COPPA, PPRA, CIPA, state laws and local norms, and consider school policies and practices related to ensuring that rigorous student data privacy and security measures are in place.

2. The school system has up to date policies and regulations addressing data privacy compliance requirements.

Example of Evidence: School system policies and/or regulations explaining process and procedure for employees to follow in order to comply with FERPA, COPPA, PPRA, CIPA, state regulation and school system rules. This should not be a simple statement of the laws, but policies and processes for employees to follow.

3. The school system's policies and regulations set clear expectations for the protection of student data privacy and security, as well as the transparent use of data.

Example of Evidence: School system policies and/or regulations explaining procedures employees are to follow to ensure the privacy and security of student data, and how the school system communicates to the community the purposes for which it collects and maintains student data.

4. A school system executive leader is identified as the person responsible for development and implementation of data privacy and security policies and practices.

Example of Evidence: Title(s) and job description(s) of individual(s) responsible for development and implementation of both privacy and security policies and practices, along with an organizational chart demonstrating that the role(s) sit at the executive level for the school system.

5. School system leaders provide transparent, updated and accessible communications regarding the collection, management and use of student data to their community.

Example of Evidence: School system newsletters, website pages, or other materials intended for the community that explain how the school system collects, manages and utilizes its student data.

6. School system leaders ensure adequate resources are available to meet data privacy and security needs.

Example of Evidence: Budget documents or related materials demonstrating that funding is in place for data privacy and security initiatives, and an explanation of the process by which school system leaders may request such funding.

Business Practices

1. The school system has implemented a process for vetting online services for data privacy and security.

Example of Evidence: Process documentation explaining how third party online services (apps, websites, data management platforms, etc.) are reviewed for alignment with legal requirements and school system data privacy and security policies.

2. The school system regularly educates its employees about the importance of, and expectations for, the use of the established vetting process for online services.

Example of Evidence: Training materials, pages from employee website explaining how they are to comply with the vetting process.

3. The school system implements contract language and data sharing agreements addressing student data privacy and data security.

Example of Evidence: Data privacy and security clauses from contracts and data sharing agreements.

4. The school system ensures that enforceable data privacy and security requirements are in place around all business processes that involve student data.

Example of Evidence: Documentation explaining how employees are to manage student data privacy and security for each business process.

Data Security Practices:

1. The school system website includes its data privacy and security policies and practices which are updated as-needed, but at least on an annual basis.

Example of Evidence: Links to data privacy and security policies and practices, as well as policy explaining under what circumstances those links might be updated. (NOTE: This is not a link to your website privacy policy, but a link on your website that explains your student data privacy and security policies outside of the website privacy policy.)

2. The school system data privacy and security procedures include, at a minimum, of all of the following: Defined data retention periods for student records; technical protocols for securing data in transit; physical, technical and administrative safeguards for securing data at-rest; controls limiting access to data.

Example of Evidence: Data privacy and security procedures.

3. The school system has enforceable policies regarding storage of data on local computers, mobile devices, storage devices and cloud file-sharing and storage services.

Example of Evidence: Policies, procedures or other documentation governing the storage of data on devices and in cloud services.

4. The school system utilizes a documented, role-based process when granting educators, staff and contractors access rights to data and technology systems.

Example of Evidence: Data access policies and documents detailing the process for requesting and approving access to data and technology systems.

5. The school system has a process in place to communicate data incidents to appropriate stakeholders, in accordance with state law and school system policies.

Example of Evidence: Communications plan for data incidents, explaining who is responsible for ensuring that notification is conducted in accordance with regulation and how that is accomplished.

6. The school system has a business continuity and disaster recovery plan which is verified and tested on an established, regular basis.

Example of Evidence: Disaster recovery plan documentation and related policies/procedures.

7. The school system performs an audit of data privacy and security practices on an established, regular basis.

Example of Evidence: Schedule of data privacy and security audits.

Professional Development Practices

1. Privacy and security of student data is embedded into training and professional development in all areas of school operations and academics.

Example of Evidence: Professional development/training materials such as websites, slide decks, videos and other supporting resource materials and annual schedule.

2. The school system provides employees with up-to-date, easily accessible resources and documented processes, including exemplars and templates that facilitate student data privacy and security.

Example of Evidence: Policies, process documents and other related materials focused on employee requirements, expectations and best practices for ensuring student data privacy and security.

3. Parents are offered awareness training and resources about student data privacy and security.

Example of Evidence: Communications and training materials for parents about the importance of student data privacy and security and how the school system works to ensure student data privacy and security.

4. All staff members participate in annual student data privacy training related to applicable federal and/or state laws.

Example of Evidence: Training materials such as documents, websites, slide decks, agendas, videos and other related materials containing overviews of applicable privacy regulation (FERPA, COPPA, PPRa, CIPA, state laws, etc.) and how they may apply to the staff

Classroom Practices

1. Teachers implement a curriculum to promote student information literacy, digital citizenship and Internet safety.

Example of Evidence: Curriculum, lesson plans and other instructional resources focused on information literacy, digital citizenship and Internet safety.

2. Teachers are aware of and regularly use the school system's established process for vetting and procuring online services to be used in the classroom.

Example of Evidence: Process documentation and professional development/training materials explaining how teachers are to review or have reviewed apps and websites they may want to bring into the classroom. Records reflecting that teachers adhere to the process.

3. Teachers model appropriate use and protection of student data for their students.

Example of Evidence: Lesson plans, documentation of activities and other materials teachers use to demonstrate to students how to keep information private.

4. Teacher communications to parents include clear information about the collection, use and protection of student data.

Example of Evidence: Communication documents, class websites/blogs and other related materials that inform parents about information that is collected about students in the classroom, how it may be used, including for basic classroom management or to facilitate learning, and how it is protected.