CoSN
LEADING EDUCATION INNOVATION

Building a Trusted Learning Environment: Understanding the Business Practice

TRUSTED LEARNING ENVIRONMENT

The TLE Program is supported by lead partners:

AASA THE SCHOOL SUPERINTENDENTS ASSOCIATION

ASBO ASSOCIATION OF SCHOOL BUSINESS OFFICIALS INTERNATIONAL

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Protecting student data privacy requires attention to both internal data collection, use, and handling operations and to that of business partners providing connected technology products. In fact, much of the concern about student data privacy in the modern school system stems from uncertainty and misunderstanding about the privacy and security practices that apply to the technology that school systems choose to bring into their classrooms. This is the case if your students are engaged in your physical classrooms or via a distance learning program.

Addressing the concerns requires understanding the data privacy and security practices of technology providers and maintaining control over elements of the education record shared with them. Establishing and implementing robust business processes to meet these requirements before technology providers are permitted to collect student data - and well before their products are put in the hands of your students - is critical to the success of any student data privacy program.

CoSN recognizes the importance of business processes in any student data privacy program and sets out business practices as one of the 5 core practice areas of the Trusted Learning Environment (TLE) Seal Program. This guide provides a detailed explanation of the TLE Business Practice requirements.

WHY BUSINESS PRACTICES MATTER

Diverse education technology products enable educators to provide immersive, impactful learning experiences that help prepare students for the future. These technologies also provide educators with the information they need to gain deep insights into their students' performance and aptitudes. In addition, enterprise technologies drive efficiencies across the school system organization, modernizing information storage and utility.

They also support continued connection between educators and students participating in a distance learning program, enhancing the learning despite the physical separation.

There are, of course, potential risks associated with education technologies. Each school system must determine how it will leverage the benefits of selected technology products while maintaining student data privacy in accordance with all applicable student data privacy laws and policies, and community norms.

Striking the right balance between benefits and protections requires thoughtful leadership in collaboration with school system technology leaders, business officials and educators.

The CoSN Trusted Learning Environment Seal Program recognizes the significant work in creating a district data security program, and the pivotal role of the data security practice in any holistic student data privacy program.

The TLE program includes 4 specific requirements for school system business practices. These are not all-inclusive, but are considered fundamental to any school system student data privacy program, and are required in order to qualify to receive the TLE Seal.

Here are the practices:

1. VETTING PROGRAM FOR ONLINE SERVICES

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

Privacy and security practices of connected technologies must be reviewed as part of any decision to use the products. A clear process must be established, documenting how online services, including apps, websites, data management platforms and more are to be assessed for alignment with legal requirements and school system data privacy and security policies.

It is a complex endeavor that requires education, training, and procedure to ensure that all products go through an agreed-upon level of review. Such review is necessary in order to determine whether the product can be used in a manner that allows the school system to comply with its legal obligations and policies, in alignment with community expectations.

The process should include the criteria for determining what data will be shared with the technology provider and for acceptability of a product in accordance with the sensitivity of the data. It should also include information about how the process will be audited to ensure it is being followed.

2. EDUCATION

The school system regularly educates its employees about the importance of and expectations for, the use of the established vetting process for online services.
Establishing a vetting process is not sufficient. The process must be followed by all employees who may be bringing technology products into the school system. Even when the usual school system schedules and routines are disrupted, the process remains paramount. That requires education and training.

All employees who may bring technology products into the school system must be provided with the training they need to understand why the vetting process is necessary, how it helps the school system meet its obligations, and what is expected of employees in order to follow the process.

> *"We included all stakeholders in building our vetting process. It took some time, but we now have a robust library of approved technology products, and our parents have confidence in the work we are doing to protect student data privacy."*
>
> Karen W. Smith, CPA, RTSBA, CIA
> Chief Financial Officer
> Cypress-Fairbanks ISD

3. CONTRACTUAL AGREEMENTS

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

Once a technology provider's privacy and security practices have been reviewed and found to be acceptable to the school system, a contract must be put in place. Whether the contract is signed by hand or by a click online, the contract is the school system's instrument of control over the privacy of its student data.

Contracts should establish student data privacy and security expectations in accordance with applicable laws and school system policies. A baseline data protection agreement should be established in collaboration with school system counsel, who can provide guidance on legal interpretations and boundaries of risk for the school system.

Contracts should be in place for all technology products, including free products used in the classroom or otherwise put in the hands of students.

4. ENFORCEABLE REQUIREMENTS FOR ALL BUSINESS PROCESSES

The school system ensures that all business processes associated with student data include enforceable data privacy and security requirements.

A lot of attention is paid to privacy and security of classroom technologies. However, school system business practices reach well beyond the classroom. When student data is shared with a technology provider, community organization, or other business partner, documented processes should be in place to address how data privacy and security practices are to be assessed and managed.

GETTING STARTED
CoSN makes a variety of resources available to school system leaders to support their ongoing student data privacy education. Take the first step by taking the Trusted Learning Environment Self-Assessment or downloading information on how to approach your application.

ADDITIONAL RESOURCES

From CoSN

Privacy Initiative Downloadable Guides:
Vetting Online Tools and Partnering with Providers: Key Sections from the Protecting Privacy in Connected Learning Toolkit
Learn how to consider different privacy laws when vetting technology products.

Trusted Learning From The Ground Up: Fundamental Data Governance Policies and Procedures
Data privacy policies and procedures every district should have in place.

Webinar:
Student Data Privacy: Developing Business Practices to Support a Trusted Learning Environment

From ASBO International:

School Business Affairs Magazine, December 2020 Issue
"Protecting Student Data Privacy"

About the CoSN Trusted Learning Environment Seal Program

The Trusted Learning Environment Seal Program is the nation's only data privacy seal for school systems, focused on building a culture of trust and transparency. The Trusted Learning Environment (TLE) Seal Program was developed by CoSN (the Consortium for School Networking), in collaboration with a diverse group of 28 school system leaders nationwide and with support from AASA, The School Superintendents Association, the Association of School Business Officials International (ASBO) and ASCD. The Program requires school systems to have implemented high standards for student data privacy protections around five core practice areas: Leadership, Business, Data Security, Professional Development and Classroom. School systems that meet the Program requirements will earn the TLE Seal, signifying their commitment to student data privacy to their community. TLE Seal recipients commit to high standards and continuous examination and advancement of their privacy practices.

About CoSN

The Consortium for School Networking (CoSN), the national association of school system technology leaders, believes that technology is an essential component of learning today, and is deeply committed to the use and distribution of technology in school systems. However, all technologies must be properly assessed for design and appropriateness in the modern classroom. Educators and companies alike must recognize and uphold their responsibilities to protect the privacy of student data. Working together, educators and the private sector serve millions of students by providing them with the rich digital learning experiences and access needed to succeed in college, work and life. That partnership is critical to ensuring that students will have the tools necessary for success in the 21st century.

About ASBO International

Founded in 1910, the Association of School Business Officials International (ASBO) is a nonprofit organization that, through its members and affiliates, represents approximately 30,000 school business professionals worldwide. ASBO International is committed to providing programs, services, and a global network that promote the highest standards in school business. Our members support student achievement through effective resource management in various areas ranging from finance and operations to food services and transportation. Learn more at asbointl.org.