

**CoSN Trusted Learning Environment:
Examples of Evidence**

| Leadership Practices | | Examples of Evidence |
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| L1 | The deliberations and decisions of school system leaders reflect an understanding of data privacy and security. | 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. |
| L2 | The school system has up to date policies and regulations addressing data privacy compliance requirements. | 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. |
| L3 | 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. | 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. |
| L4 | A school system executive leader is identified as the person responsible for development and implementation of data privacy and security policies and practices. | 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. |
| L5 | School system leaders provide transparent, updated and accessible communications regarding the collection, management and use of student data to their community. | 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. |

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| L6 | School system leaders ensure adequate resources are available to meet data privacy and security needs. | 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. |
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| Business Practices | | Examples of Evidence |
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| B1 | The school system has implemented a process for vetting online services for data privacy and security. | 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. |
| B2 | The school system regularly educates its employees about the importance of, and expectations for, the use of the established vetting process for online services. | Training materials, pages from employee website explaining how they are to comply with the vetting process. |
| B3 | The school system implements contract language and data sharing agreements addressing student data privacy and data security. | Data privacy and security clauses from contracts and data sharing agreements. |
| B4 | The school system ensures that all business processes associated with student data include enforceable data privacy and security requirements. | Documentation explaining how employees are to manage student data privacy and security for each business process. |

| Data Security Practices | | Examples of Evidence |
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| S1 | 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. | 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.) |

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| S2 | The school system data privacy and security procedures include information about data retention periods for student records, data transmission technical protocols, data at-rest and methods and controls limiting access to electronic data. | Data privacy and security procedures. |
| S3 | The school system has enforceable policies regarding storage of data on local computers, mobile devices, storage devices and cloud file-sharing and storage services. | Policies, procedures or other documentation governing the storage of data on devices and in cloud services. |
| S4 | The school system utilizes a documented, role-based process when granting access rights to educators, staff, and contractors to data and technology systems. | Data access policies and documents detailing the process for requesting and approving access to data and technology systems. |
| S5 | The school system has a process in place to communicate data incidents to appropriate stakeholders, in accordance with state law and school system policies. | Communications plan for data incidents, explaining who is responsible for ensuring that notification is conducted in accordance with regulation and how that is accomplished. |
| S6 | The school system has a business continuity and disaster recovery plan which is verified and tested on an established, regular basis. | Disaster recovery plan documentation and related policies/procedures. |
| S7 | The school system performs an audit of data privacy and security practices on an established, regular basis. | Schedule of data privacy and security audits. |

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| Professional Development Practices | | Examples of Evidence |
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| P1 | Privacy and security of student data is embedded into training and professional development in all areas of school operations and academics. | Professional development/training materials such as websites, slide decks, videos and other supporting resource materials and annual schedule. |
| P2 | 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. | Policies, process documents and other related materials focused on employee requirements, expectations and best practices for ensuring student data privacy and security. |
| P3 | Parents are offered appropriate awareness training and resources about student data privacy and security. | 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. |
| P4 | All staff members participate in annual student data privacy training related to applicable federal and/or state laws. | 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 | | Examples of Evidence |
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| C1 | Teachers implement a curriculum to promote student information literacy, digital citizenship and Internet safety. | Curriculum, lesson plans and other instructional resources focused on information literacy, digital citizenship and Internet safety. |
| C2 | Teachers are aware of and regularly use the school system's established process for vetting and procuring online services. | 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. |

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| C3 | Teachers model appropriate use and protection of student data for their students. | Lesson plans, documentation of activities and other materials teachers use to demonstrate to students how to keep information private. |
| C4 | Teacher communications to parents include clear information about the collection, use and protection of student data. | 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. |

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