Case Study:
Building a Statewide Student Data Privacy Movement in Indiana

Pete Just (in checked shirt) discusses student data privacy during an Indiana CTO Council strategic planning session.

On his second day as chief technology officer (CTO) at Zionsville Community Schools in 2015, Dan Layton received a call from a parent—who also happened to be an attorney. The question: How was his child's data being shared with vendors, and what safeguards were in place to protect it?

"I was dumbfounded," says Layton. "We didn't have any best practices or guidelines in place."

That conversation sparked what has become one of the most collaborative state-wide student data privacy efforts in the country. Today, Indiana is part of CoSN's Trusted Learning Environment (TLE) State Partnership Program, a national program framework that provides state education agencies with better insights into how their districts are performing around privacy requirements while helping districts strengthen their student data privacy practices and build trust around privacy with their communities.

The Challenge: Privacy Without Policy

Indiana does not have comprehensive student data privacy legislation, so districts have been relying only on FERPA requirements to guide their privacy work. While FERPA is keenly focused on individual parents and student rights, and rules related to the district's sharing of student data, it doesn't cover all the ground needed to build a well-rounded privacy program.

"[Student data privacy work] gets pushed to the bottom of the list too often." —Chantell Manahan, Director of Technology, MSD of Steuben County

As a result, districts are often left to figure out how to build a privacy program without the guidance or training needed to do so. The work can end up taking a backseat due to the complexity and competing priorities.

As Chantell Manahan, director of technology at MSD of Steuben County Schools, says: "We have federal guidance around FERPA, but no state laws or other guidance to dig into this, even though it's best practice. It gets pushed to the bottom of the list too often."

This absence of structural guidance and support left districts under-resourced or without sufficient knowledge, training, and wherewithal to act proactively on student data privacy.

But in November 2024, the Indiana Department of Education joined CoSN's TLE State Partnership Program, a turnkey solution that includes:

- Unlimited free TLE Seal applications and renewals for all school districts.
- Comprehensive statewide benchmarking reports that aggregate performance across the 25 core TLE privacy and security practices, allowing districts to understand where they stand compared with districts that have already demonstrated sufficient maturity in their student data privacy practices to earn the TLE Seal.
- Targeted resources and guidance tailored to address each district's most significant privacy gaps, derived from the benchmarking insights.
- A tiered structure of support with measurement and improvement and the option to add facilitated training and more.

62%

of TLE Seal recipients responsible for the student data privacy program reported that privacy was mentioned as a responsibility in their job description, in contrast to 27% of non-TLE district survey respondents.

(Source: CoSN National Student Data Privacy Report, Part 2)

By embedding the TLE framework into existing state infrastructure, Indiana effectively leveled the playing field—empowering both urban and rural districts, large and small, to move from going it alone on privacy to collaborating for more confident, scalable improvements.

Early Adopters: Proof of Concept

Before the CoSN TLE State Partnership Program existed, three Indiana districts—Carmel Clay Schools, Noblesville Schools, and Zionsville Community Schools—had earned their TLE Seals. Each had strong local support for student data privacy initiatives.

For Zionsville's Layton, the TLE framework was a timely discovery. He first encountered it at a state EdTech conference two months into his tenure. "It was the perfect way to get all the oars rowing in the same direction—and it hit every mark."

Even so, Zionsville's first application was rejected. Layton viewed that not as a failure but as a valuable step forward. He knew there were parts missing but wanted to get feedback. That feedback gave him a clear roadmap for year two.

Carmel Clay Schools pursued a different path, hiring Kate Masterson as the district's first dedicated K-12 data privacy expert. "She led our Trusted Learning application process and she advocates for student data privacy across the state," says Christi Cloud, director of technology and data solutions.

The Breakthrough: From Individual to Collective

Pete Just, a former CTO who helped develop the original TLE framework, saw an opportunity in the state's EdTech community. "In Indiana, we feel that as we help each other, we all rise," he says. "That collaboration has always been part of our state's culture."

"In Indiana, we feel that as we help each other, we all rise."
—Pete Just, former district CTO and leader of the Mini Seals collaboration work

Indiana technology leaders at the 2026 Indiana CTO clinic in Noblesville.

The initial plan was to form a two-year cohort of 10 to 15 districts working toward TLE certification. Six months after launching the program through the Indiana CTO Council, 45 districts have joined.

The timing was ideal. CoSN had just introduced TLE mini seals, allowing districts to earn recognition in individual practice areas. "Mini seals make it more accessible," says Just. "Instead of trying to do everything at once, you can focus on one area, create momentum, and build from there."

The Peer Mentorship Model

The three original seal-holding districts became cohort mentors. "We share our experiences and resources to make the process successful," says Cloud. "We know how daunting the full task can be."

Mentors host virtual and in-person meetings, often aligned with Indiana CTO Council gatherings to boost participation. They also present at state conferences, offering practical advice, candid reflections, and examples of successful applications.

Each district begins by selecting a single mini-seal—business practices, leadership, data security, classroom, or professional development—with the goal of applying within six to nine months. Smaller clusters of neighboring districts often form accountability groups, meeting every few weeks to share progress and troubleshoot challenges.

Districts can access shared folders with templates, model policies, and documentation examples. Plans are underway for writing workshops to help districts turn existing practices into strong application evidence.

Real District Impact

For Manahan, the mini-seal option shifted the conversation entirely. "I know we can get at least two, maybe three, without major overhauls," she says.

Working alongside other districts has helped participants recognize their existing strengths. "Evidence means you're doing it," says Just. "One of the biggest lessons districts are learning is the importance of documenting the good work they already do."

Cloud shares that certification is not the finish line. "Even after earning our seal, we continually review strategies, update contracts, and hold vendors accountable. When we do that collectively, the load is lighter."

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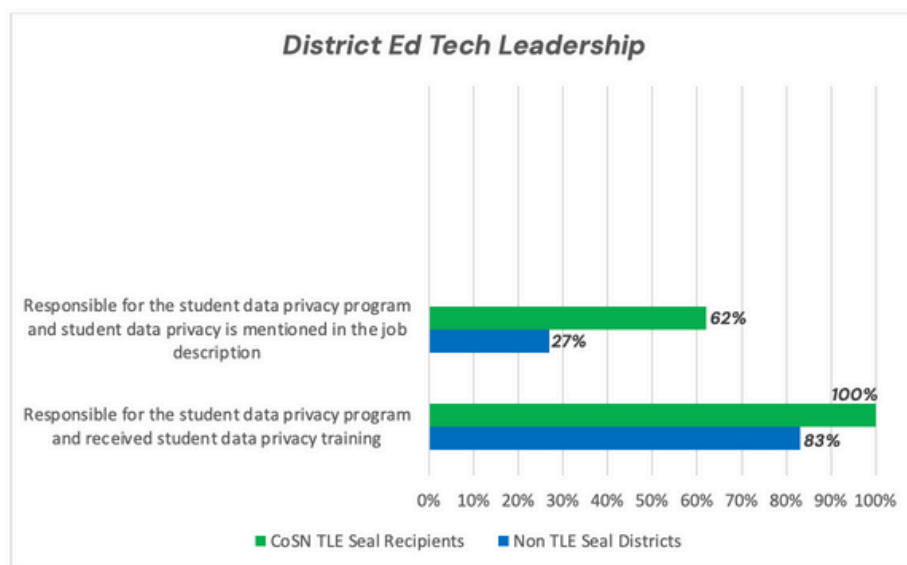> —Pete Just

Looking Ahead

Layton encourages other states to act now. "If you evaluate your practices, you'll find strengths and weaknesses. Play to your strengths, fix the gaps, and just get started," he says.

Indiana's experience shows that major statewide gains in student data privacy can be achieved without mandates or large budgets. The key ingredients—a clear framework, a culture of collaboration, peer mentorship, and sustained engagement—can be adapted to any state.

As Cloud says, "It's not always popular work—sometimes you have to say no to tools that staff really want when vendors don't take privacy seriously—but it's good work. When we do it together, everyone benefits."

Indiana CTOs discuss student data privacy at The Pyramids in Indianapolis in July 2025.

District Ed Tech Leadership

Responsible for the student data privacy program and student data privacy is mentioned in the job description: CoSN TLE Seal Recipients 62%, Non TLE Seal Districts 27%

Responsible for the student data privacy program and received student data privacy training: CoSN TLE Seal Recipients 100%, Non TLE Seal Districts 83%

■ CoSN TLE Seal Recipients ■ Non TLE Seal Districts

(Source: CoSN National Student Data Privacy Report, Part 2)

About CoSN

CoSN is the premier professional association designed to meet the needs of K–12 EdTech leaders, their teams and other district leaders. CoSN provides thought leadership resources, community, best practices and advocacy tools to help edtech leaders succeed in the digital transformation. CoSN represents over 13 million students and continues to grow as a powerful and influential voice in K–12 education. CoSN.org

About the CoSN TLE State Partnership Program

The CoSN Trusted Learning Environment (TLE) State Partnership program is the nation's only data privacy framework for school systems, focused on building a culture of trust and transparency. The TLE State Partnership Program was developed by CoSN 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 ISTE+ASCD. 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 also commit to continuous examination and demonstrable future advancement of their privacy practices.

For more information or to get started with a CoSN TLE State Partnership Program, contact Linnette Attai at lattai@cosn.org.

The CoSN TLE Seal Program is supported by lead partners: