TO: Dr. Carol Kelley, Superintendent of Schools
FROM: Michael Arensdorff, Director of Technology
SUBJECT: Data Services Process
DATE: August 6, 2015

Over the past year, I have been developing a process to help the district preserve and protect the safety and security of our instructional and operational data. This includes the student data that we collect in conjunction with the online applications and programs we use in our classrooms.

As part of this process, any staff member who is interested in utilizing an application or program that requires the creation of a student user account or the collection of student data must fill out and submit a "Program Request Form." Two of our data and instructional coaches review these requests and determine via research and testing whether the use of the application or program would benefit our students. Those two individuals share their findings with the rest of the coaches, who then present me and any other appropriate central office administrator with a recommendation from the team.

If the team believes there is merit to using the application or program, the next step is to assess and analyze the privacy policy and data security that govern its use. This step includes reviewing the privacy policy and other privacy-related documentation provided by the company that created and/or owns the application or program. In addition, I contact the company and ask a variety of questions regarding data security, including:

1. Where is the data housed?
2. Who owns the data?
3. Do you sell student data to third party vendors?
4. What would happen to the data if the contract were terminated, or if your company is sold, acquired or goes out of business?
5. Do you have a data security agreement?

If our assessment and analysis uncover any irreconcilable issues or concerns that will impact the safety and security of our data, we share those with the individual who submitted the request and let him/her know that the application or program has not been approved for use. If we do not encounter any issues or concerns, we move on to the next step in the process, which is to negotiate the terms of a contract regarding the use of the application or program.

In order to maximize the protection of our data, I believe that companies that provide us with online applications or programs should be required to sign a data services/security agreement as part of their contract with the district. This is something that has become a standard practice in several of our peer districts.

As part of my membership with CoSN (the Consortium for School Networking), I was able to secure a sample template for a data services/security agreement that was created by the technology director from District 214 and the chief information officer from District 101. I shared the template with the board's legal counsel, who helped revise it to make it more specific for our district. The result was the creation of a District 97 Data Services Agreement and Addendum A, which are attached for your review. I recommend, and our legal counsel agrees, that these documents, or at least the key terms they contain, should be part of any contract associated with district data that we enter into moving forward. If you and the board agree with this recommendation, the documents will become part of the review and contract process described above.

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