Policies, Programs, and Implementation (PPI) Standing Committee Meeting Summary
Friday, June 24, 2022

Welcome and Introductions

PPI Chair Linda Jenkins, Arkansas Department of Education, and PPI Vice Chair Stephen Gervais, San Bernardino Unified School District (CA), introduced themselves and welcomed Forum members to the meeting.

Data Privacy Presentation

Linda introduced a member of the Privacy Technical Assistance Center (PTAC) team, who gave a presentation focused on two key areas: data protection responsibilities as a component of cross-agency data sharing and the intersection of data interoperability and data privacy.

Cross-agency data sharing involves securely linking administrative data across government agencies. Because an integrated data system can have a variety of possible external sources of administrative data, state and local education agencies (SEAs and LEAs) need to consider the various federal, state, and local laws that may play into any linked personally identifiable data. The presentation highlighted the use of data mapping in protecting data; this is the process used when educational agencies and institutions create a visual "map" of data flows for their data. Including these maps in data governance plans can help organizations to better understand

- what data are in their systems;
- where the data reside;
- what sources the data come from;
- why the data are collected;
- what limitations or restrictions apply;
- how data are linked; and
- what policy questions the data are used to answer.

Additionally, best practices in governance and information security include

- decision-making authority;
- standard policies and procedures;
- data inventorying;
- data records management;
- data quality;
- data access control;
- recordation; and
- data security and risk.

The second half of the presentation focused on the intersection of data interoperability and data privacy. Data interoperability is the seamless, secure, and controlled exchange of data between applications. It allows educators to view and use information from multiple source systems in a single, secure dashboard and helps to contextualize student learning. Data privacy requires individuals to use and handle data properly, such that personally identifiable information (PII), education records, longitudinal data, and other sensitive data are protected. It includes maintaining the confidentiality of data, as well as adhering to federal, state, and local privacy

laws and regulations. Data interoperability narrows the channels through which data are transferred, which increases privacy and security. It can also help facilitate data transfers and make student data more available and secure. Data use must still comply with Family Educational Rights and Privacy Act (FERPA) requirements. It is imperative that data are kept secure and used appropriately.

Q&A and Discussion

Handling Data Requests while Protecting Data Privacy and Security

Members discussed the challenges related to handling data requests from both external and internal researchers. Sharing data while adhering to data privacy requirements can require a careful balance between protecting potentially identifiable information and offering transparency. SEAs and LEAs may have different arrangements and policies for data sharing, but an internal understanding of who can access what information and for what purposes can help all parties.

Members also discussed requests from stakeholders that may lead to PII or other sensitive data being exposed. For example, one LEA has had requests related to its school improvement plan, but embedded data in the documents means that the documents cannot be shared beyond the teams using them. The LEA is working with related agencies to de-identify some data, but it is a continuing process. SEAs and LEAs are encouraged to contact PTAC to help deal with data privacy issues such as this. The PTAC team can work with agency staff to address their unique needs and circumstances along with any challenges that may arise.

Closing Remarks

Linda closed the meeting by thanking the PTAC presenter and Forum members and reminding the members that PPI will meet again during the July Forum meeting.