Student Data Privacy Lunch and Learn

PRESENTED BY

Ken Nero *CEO & Matt Hejna K-12 Senior Advisor*

Who We Are

IKON Edu-Tech Group (IBG) is a 20-year-old premium IT consulting company focused on providing K-12 schools with customized technology solutions and personalized support. Through our charitable organization, **IKON Cares**, we are committed to providing students in disadvantaged neighborhoods with early exposure and access to technology.

Matthew Hejna
K-12 Senior Advisor

Matthew Hejna served 31 years in the New York Education system as a literacy instructor for incarcerated youth at Rikers Island and as an administrator for Nassau BOCES. He was a Supervisor of the Guidance Technology Support Service, the Nassau Association of School Technologists, and the Data Privacy & Security Service of which he was a founding contributor as part of the state-wide RIC One Consortium.

Specializing in K-12 Technology Needs

"The skillset that IKON brings and their laser-focus on K-12 schools were key differentiators. It's important for us to work with vendors who are invested in our community. Working with a managed services provider who specializes in the education space has been invaluable."

Emeka Ibekweh, Managing Director of Technology
Ascend Public Charter Schools

We have been servicing the K-12 education market for ten years with a specific emphasis on meeting the needs of Charter Schools, Independent Schools, and Private Daycare Centers. IBG engineers have a wealth of experience working with schools of all sizes.

Members of Our EduTech Team

Marc Epstein, K-12 Advisor
Marc Epstein has been an educational technology leader for 30+ years. Marc started out as an elementary computer teacher in Elmont, became a middle school computer coordinator in Great Neck, and was later appointed their first Technology Director. Marc was awarded the 2010 Nassau BOCES School Library System Administrator of the Year Award and the 2020 Fred Podolski Leadership and Innovation in Technology Award.

Emeka Ibekweh, K-12 Advisor
Emeka is a Senior Cloud Engineer at Google. Previously, Emeka served as a Senior Manager at Amazon Web Services and CTO at Ascend Learning where he managed technology strategy for 20 schools. While at The Harlem Children's Zone and Promise Academy Charter Schools, lead the implementation of a cloud-based student information system and the building of a private, virtual cloud. These efforts lead to over $3M in year cost savings.

Guy Lodico, K-12 Advisor
Dr. Guy Lodico served as Director of Technology for Plainview-Old Bethpage Schools, Coordinator of EdTech for 32 NYC Public Schools, President of NYSCATE, and Chairman of the BOCES NASTECH organization. He holds a Ph.D. in Educational Leadership, achieved CETL status, is a recipient of the Outstanding NYS Technologist and SAANYS Leadership & Support awards; and was inducted into the NYSCATE Hall of Fame in recognition of his 30+ years of service across the State.

Members of Our EduTech Team

Dr. Rita Melikian K-12 Advisor
has worked in the education technology field for more than 30 years including as the Director of Technology at Garden City Public Schools for 26 years until her retirement in 2022. She has managed an IT team responsible for the computer network and security of the school district with 4000 students and 650 faculty and staff. As the Data Protection Officer, Dr. Melikian was responsible for the compliance and implementation of all aspects of NYSED Law 2-d in Garden City Public Schools. She earned an Ed.D. in Instructional Technology from Teacher College, Columbia University.

Sean Adcroft, K-12 Advisor
Sean Adcroft, PhD, served as Director of Technology for the Manhasset School District from 2001-2023. He has experience in cybersecurity, budgeting, E-Rate funding, compliance with New York's Education Law 2D, and the meaningful use of technology to improve instruction and learning. Dr. Adcroft has also developed and taught a course on instructional technology for Fordham University's Graduate School of Education.

Why We're Here

Today, we'll discover the first steps in Implementing your School Data Privacy Program.

IKON BUSINESS GROUP

First Charter School Audited by NYSED

- On June 7th, the NY State Comptroller issued its audit finding on a Charter School in Westchester.

- The key finding was that the officials needed to adequately secure student data to help protect it from unauthorized access and develop an IT contingency plan.

- Increase risk of unauthorized access to student personal, private, and sensitive (PPSI) plus personal identifiable information.

- The school could suffer a serious interruption to operations as its ability to communicate during a disruption or disaster could affects its timely processing of business functions.

Key Findings

- School employees needed guidance on how to identify and secure sensitive data correctly.

- Three out of six tested users of the cloud-based application used for School operations stored sensitive student data without adequate protection, and 12 of the 125 users of the cloud-based Student Information System (SIS) had excessive or unnecessary access to view and modify sensitive student data.

Key Recommendations

- Review, revise (if necessary), adapt, and communicate the data classification policy to employees.

- Ensure all access to sensitive student data is based on needs and job responsibilities.

- Develop a written IT contingency plan.

Key Takeaways

- The Superintendent designated the Director of Student Data (Director) as the Data Protection Officer (DPO), who is responsible for implementing data privacy and security policies and procedures and serves as the School's point of contact for data security and privacy. – Not a good selection for this role

- The School has a Service Level Agreement (SLA) with an IT vendor to manage the School's day-to-day IT operations, including shared application folders and SIS, and ensuring appropriate IT contingency measures are in place and tested. – An IT company SLA only speaks to the uptime of services and response to downtime.

Keys to Building a Viable Security Student Data Privacy

- Student data privacy is not just an IT function; it requires participation from all levels

- It requires a culture shift

- Schools must be accountable at the board and leadership levels.

- The data privacy officer must be the most qualified, not the most technical.

- The entire school board, leadership, staff, teachers, and students must be trained in handling data.

- Compliance must be monitored and assessed on a continuous basis.

How to Start

- Metric's should be established to determine the success of your compliance program.

- Learn the Laws – FERPA, COPPA, CIPA.

- State laws ED law 2D

- Create a mission statement for the compliance program.

- Propose the first set of goals and time frame to complete.

How to Start

First, assess your current environment.

Evaluate people in your organization to determine who is the most qualified to serve as the DPO and whether an external person needs to be hired.

Do a NIST gap Analysis to compare what you have in place with what you need. Gaps should be ranked according to risk.

Remediation plans must be created to address existing issues and create new policies.

Preparing for NIST Gap Analysis

- What System is the student's Personal Information stored, and how does the system operate?

- Where is the system located?

- Where and from whom is the data collected?

- Is the data uploaded automatically or manually?

- Who is responsible for the data upload process and how are they trained on secure upload practices and held accountable?

- Does data move out of the system?
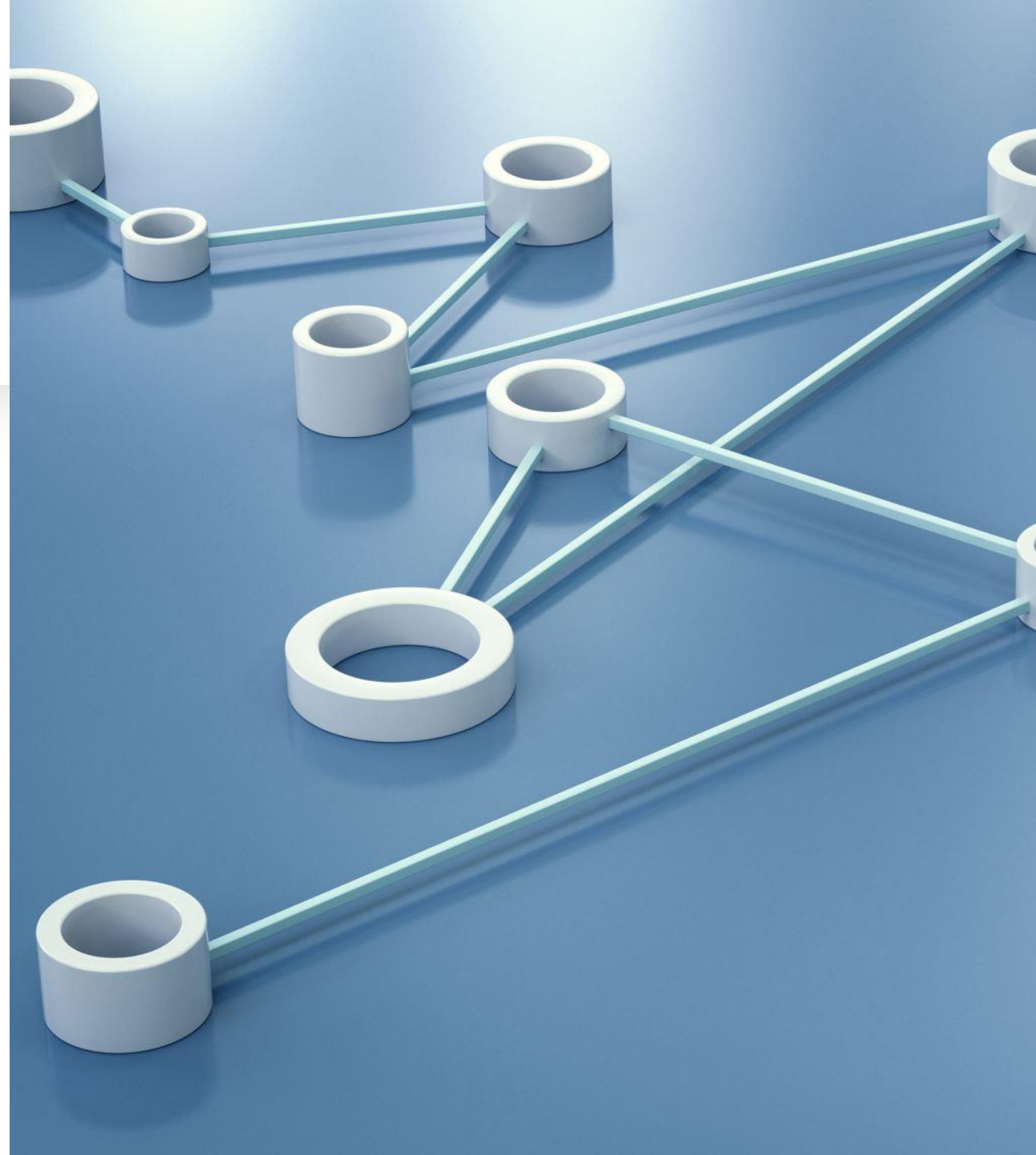
What is the data used for?

Was a security audit, penetration test, and vulnerability scan conducted? If so, what were the results?

See example sheet for complete questions

Identify Stake Holders

- Ownership and decision-making responsibilities for a data system, data set, or procedure.

- Individuals who manage daily operations and those who use the data.

Pre-Assessment

- The preassessment goal is to identify current practices and areas of the data protection efforts that appear out of alignment.

- Sample subject of Preassessment

- Who has access to student personal information

- Who has access to what data storage systems

- Rules for sharing Student personal information among employees

- Where is data stored

- How long is data retained

- Security incident Response procedure and training

- Disaster recovery procedures and testing

See complete preassessment questionnaire

Collect and Evaluate

- Collect
- Make a list of all the type of personal information the school system collect from or about students. (names, ID numbers, grade levels, Grades, test score, behavior, health information, parent information, addresses, sports team, clubs, counseling appointments, attendance, individualized learning plans, career goals, awards, photos/videos, parent notes, etf.
- Create a Classification Scheme
- Classify the data

What Should the First Stage of Your Program Consist of?

- Assigned DPO Officer

- Assigned Stake Holders

- The written goal with milestones

- Data Mapping

- Preassessment Questionnaire

- Gap Assessment

- Remediation plans

- Roadmaps

- Planned training

- Reporting and metrics

- Recurring Assessments

- Gap Annually, Pen Testing Annually

- Develop a Disaster /Contingency plan

- The technology plan is recommended

IKON EDUTECH DPO PROGRAM

Is your school's Data Protection Officer (DPO) in need of extra support to ensure compliance with data protection regulations? We recognize that schools often face time and resource constraints when dealing with the demands imposed by legislation such as New York State Education Law 2-D.

We provide support services to assist your school's DPO while adopting a cost-effective risk management approach. By working with us, you can establish a sustainable, long-term solution to your compliance challenges, allowing you to maintain the highest quality education for your students. We're here to provide guidance and support for your in-house data protection requirements whenever you need it.

Why Choose Us for Your DPO Support Needs?

Expertise in Education Law 2-D
We specialize in Education Law 2-D compliance, ensuring your school's data is secure and compliant. Our team understands the unique needs of K-12 independent and charter schools in New York State.

Cost-Effective Solution
Having us work with your DPO is cost-effective and helps you save money and resources while maintaining top-tier data protection.

Tailored Compliance Strategies
We develop personalized compliance strategies to suit your school's specific needs. We stay up-to-date with evolving data protection laws and regulations to ensure your school complies with the latest requirements and best practices.

Proven Track Record
Trusted by numerous K-12 schools in New York State. We have a successful track record of data protection and compliance. With decades of experience in school leadership and administration, the IKON EduTech Advisory Group is here to help.

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What's Included in Our DPO Compliance Support Package?

Our top package includes 12 hours of online support, monthly Q&A webinars, and a listserv for subscribing schools in addition to the following:

- **Review of DPO Role & Responsibilities**
- **Website Compliance Review to ensure the following is posted & easily accessible:**
  - Parents' Bill of Rights for Data Privacy & Security (PBOR)
  - District Supplemental Information of approved third-party contracted products & services
  - District Security & Privacy Policy
  - Unauthorized Disclosure Complaint procedure
- **Annual Employee Training (strategies & resources)**
- **Protecting PII**
  - Data Flow Mapping
  - Data Classification
  - Data Access Control
  - Network Configuration (Firewalls, Cybersecurity software)
  - Incident Reporting and Notification
- **Third-Party Contract Data Privacy Agreement Compliance (software inventory)**
- **NIST Cybersecurity Framework (utilizing Minerva software at an additional cost)**
  - Gap Analysis
  - Remediation

What's Included in Our DPO Compliance Support Package?

GOLD

- Designated EduTech Consultant Monthly
- Pen Test Monthly
- NIST Gap Analysis Annually
- Website Review Annually
- Incident Reporting Template
- Remediation Planning
- Sample Security Plan
- Third-Party Contract Data Privacy Agreement
- Data Classification
- Data Flow Mapping
- Minerva Platform – Compliance

SILVER

- Designated EduTech Consultant Bi-Monthly
- Pen Test Monthly
- NIST Gap Analysis Annually
- Website Review Annually
- Incident Reporting Template
- Remediation Planning
- Sample Security Plan
- Third-Party Contract Data Privacy Agreement
- Data Classification
- Data Flow Mapping

BRONZE

- Designated EduTech Consultant Quarterly
- Pen Test Annually
- NIST Gap Analysis Annually
- Website Review Annually
- Incident Reporting Template
- Remediation Planning
- Sample Security Plan
- Third-Party Contract Data Privacy Agreement
- Data Classification

Not ready for an annual commitment? Try our Starter Package, which includes the following for a one-time fee:

- 5-hours of EduTech Consulting
- Website Review
- Cybersecurity Performance Goals