



## CDE Support for LEPs

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### Deadlines Set by Law

- Create and make available a sample student information privacy and protection policy for LEPs by March 1, 2017. [C.R.S. 22-16-106 (2)]

### Anticipated March 2017 Completion

- Develop data security guidance for LEPs.\* [C.R.S. 22-16-106 (1)]
- Prepare and provide LEPs with sample contract language.\* [C.R.S. 22-16-106 (3)]
- Identify resources that LEPs may use in training employees.\* [C.R.S. 22-16-106 (4)]

### Long-term Efforts

- Create and implement a complete program to provide training to LEPs related to student information security and privacy.\* [C.R.S. 22-16-106 (4)]

\*Work has begun on these tasks and resources will be provided (<http://www.cde.state.co.us/dataprivacyandsecurity/newprivacylawresources>) as soon as they are completed.

## Internal CDE Requirements

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### Work Already Completed

- Assign each public school student a unique student identifier. (Rollout of SASID process completed in 2002.) [C.R.S. 22-16-105 (1)]
- CDE may not sell, trade, gift, or monetize student PII. [C.R.S. 22-16-105 (3)(d)]

### Ongoing Activities to be Updated/Enhanced

- Conduct compliance audits to ensure ongoing compliance with laws, policies, and procedures. [C.R.S. 22-16-104 (1)(e)]
- Develop user-friendly information for the public related to CDE's data sharing agreements. Available here: <http://www.cde.state.co.us/dataprivacyandsecurity/agreements>. [C.R.S. 22-16-104 (1)(c)]
- Develop, publish, and make publicly available policies and procedures to comply with laws and policies. Available here: <http://www.cde.state.co.us/dataprivacyandsecurity/procedures>. [C.R.S. 22-16-104 (1)(b)]
- Develop a detailed data security plan. [C.R.S. 22-16-104 (1)(d)]
- Create and publish a data dictionary or index of data elements. Available here: <http://www.cde.state.co.us/dataprivacyandsecurity/dataelementscollected>. [C.R.S. 22-16-104 (1)(a)]
- Publish and maintain a list of all department contracts or agreements. Available here: <http://www.cde.state.co.us/dataprivacyandsecurity/agreements>. [C.R.S. 22-16-105 (4)]



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## Deadlines Set by Law

- Update research agreements to meet specified requirements and include non-compliance and destruction penalties for agreements entered into after August 10, 2016. Available here: <http://www.cde.state.co.us/dataprivacyandsecurity/agreements>. [C.R.S. 22-16-104 (1)(f-g), C.R.S. 22-16-105 (2)(b-c)]
- Update contracts with third parties that involve PII to meet specified requirements of the bill and include penalties for non-compliance for contracts entered into after August 10, 2016. Available here: <http://www.cde.state.co.us/dataprivacyandsecurity/agreements>. [C.R.S. 22-16-105 (5)]

## Anticipated December 2016 Completion

- Develop a process to review research requests, obtain approval from the State Board of Education, and implement the process. [C.R.S. 22-16-105 (2)(a)]

## Anticipated March 2017 Completion

- Ensure that the department does not require the LEPs to provide information not required by law, a grant proposal, or requested as part of the provision of a benefit to the LEP. [C.R.S. 22-16-105 (3)(a)]
- Ensure that the department does not transfer PII to a federal, state, or local agency outside of the state unless allowed for under the bill or federal law. [C.R.S. 22-16-105 (3)(c)]
- Create a webpage to post notices if an LEP has ceased using a school service on-demand provider. [C.R.S. 22-16-106 (5)]
- Develop a process for public hearings if a third party commits a material breach and present the process for the approval from the State Board of Education. [C.R.S. 22-16-105 (5)]
- Ensure that the department does not collect PII related to:
  - Juvenile delinquency records
  - Criminal records
  - Medical and health records
  - Student SSNs
  - Student biometric information
  - Information concerning the political affiliations or the beliefs or attitudes of students and their families [C.R.S. 22-16-105 (3)(b)]

## Where can I learn more?

- CDE's Data Privacy and Security website: <http://www.cde.state.co.us/dataprivacyandsecurity>
- CDE's New Privacy Law Requirements page: <http://www.cde.state.co.us/dataprivacyandsecurity/newprivacylawresources>
- Contact the Data Privacy Office at [dataprivacy@cde.state.co.us](mailto:dataprivacy@cde.state.co.us)