

DISTRICT OF COLUMBIA PUBLIC CHARTER SCHOOL BOARD

Staff Proposal	School Request
<input type="checkbox"/> Charter Application Approval (Full)	<input type="checkbox"/> Enrollment Ceiling Increase
<input type="checkbox"/> Charter Application Approval (Conditional)	<input type="checkbox"/> Change in LEA Status
<input type="checkbox"/> Charter Application Denial	<input type="checkbox"/> Lift Board Action
<input type="checkbox"/> Charter Continuance	<input type="checkbox"/> Approve Accountability Plan
<input type="checkbox"/> Proposed Revocation	<input type="checkbox"/> Operate in a New Location
<input type="checkbox"/> Revocation	<input type="checkbox"/> Charter Amendment
<input type="checkbox"/> Lift Board Action	<input type="checkbox"/> Approve E-Rate Plan
<input type="checkbox"/> Board Action, Charter Warning	
<input type="checkbox"/> Board Action, Notice of Concern	
<input type="checkbox"/> Board Action, Notice of Deficiency	
<input type="checkbox"/> Board Action, Notice of Probation	
<input type="checkbox"/> Proposed Revisions to PCSB Existing Policy	
<input type="checkbox"/> New PCSB Policy—Open for Public Comment	
<input checked="" type="checkbox"/> New PCSB Policy—Vote	
<input type="checkbox"/> Other—Discussion Item	

PREPARED BY: Mikayla Lytton – School Performance Department

SUBJECT: Data Access Security Policy

DATE: November 18, 2013

Proposal/Request

DC Public Charter School Board (“PCSB”) staff requests that its Board vote to approve the proposed Data Access Security Policy. The proposed policy was opened for public comment September 16 – October 16; no public comments were submitted.

Policy

Beginning in School Year 2013-14, all public charter Local Education Agencies (“LEAs”) and their constituent campuses will be responsible for ensuring that only authorized school staff have access to the school’s student-level data in PCSB’s data systems, including but not limited to ProActive, SharePoint, Epicenter, and Secure File Transfer Protocol (“SFTP”) sites. Accordingly, each LEA will be responsible for the following:

- Reviewing, before the beginning of each school year, staff access to all applicable data systems and notify PCSB of any individuals who should not have access to the systems. PCSB will help schools in this process through training, documentation, and, as necessary, hands on assistance.
- Requesting additional staff access to PCSB’s data systems on an as-needed basis.
- Notifying PCSB in writing of any contractors, consultants, or other third parties who it has authorized to access the school’s student-level data and communicate with PCSB on its behalf.

- Providing PCSB with the contract that delineates the measures in place to ensure compliance with the Family Educational Rights Privacy Act (“FERPA”).
- Notifying PCSB within 5 business days after staff or consultants with access to PCSB’s data systems leave their position or have their contracts terminated. PCSB will deactivate those individuals’ access to ProActive, SharePoint, Epicenter, and any other data systems in place within 5 business days of receiving the notice.
- Prohibiting school staff from sharing logins to ProActive or Epicenter. If additional staff members need access to these databases, the school will request access for each individual.

Background

PCSB collects student-level data directly from charter LEAs and campuses for local and federal reporting; accountability, including Performance Management Framework calculations; monitoring of legal compliance; internal analysis; and other purposes as necessary. To support data quality assurance efforts and analysis, PCSB makes available student-level and aggregated data to the schools and their authorized staff. In order to comply with FERPA, PCSB and schools must ensure that only school-determined authorized staff have access to student-level data, including enrollment, demographic, attendance, discipline, and academic data.

In the past, PCSB has requested that schools notify PCSB of any staffing changes. However, the process for doing so was not formalized in policy.

Date: _____ PCSB Action: _____ Approved _____ Approved with Changes _____ Rejected Changes to the Original Proposal/Request: _____ <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
