

**Pelham Public Schools**

**Pelham, NY 10803**



**Parents' Bill of Rights for Data Privacy and Security**

In accordance with New York State Education Law Section 2-d, the Pelham Union Free School District hereby sets forth the following Parents' Bill of Rights for Data Privacy and Security, which is applicable to all students and their parents and legal guardians.

- (1) New York State Education Law Section 2-d ("Section 2-d") and the Family Educational Rights and Privacy Act ("FERPA") protect the confidentiality of personally identifiable information. Section 2-d and FERPA assures the confidentiality of records with respect to "third parties," and provides parents with the right to consent to disclosures of personally identifiable information contained in their child's education records. Exceptions to this include school employees, officials and certain State and Federal officials who have a legitimate educational need to access such records. In addition, the District will, upon request of parents, or adult students, or if otherwise required by law, disclose student records to officials of another school district in which a student seeks to enroll.
- (2) A student's personally identifiable information cannot be sold or released for any commercial purposes;
- (3) Personally identifiable information includes, but is not limited to:
  - i. The student's name;
  - ii. The name of the student's parent or other family members;
  - iii. The address of the student or student's family;
  - iv. A personal identifier, such as the student's social security number, student number, or biometric record;
  - v. Other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name;
  - vi. Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does

not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or

vii. Information requested by a person who the District reasonably believes knows the identity of the student to whom the education record relates.

(4) In accordance with FERPA, Section 2-d and District Policy# 7240, *Student Records: Access and Challenge*, parents have the right to inspect and review the complete contents of their child's education record;

(5) The District has the following safeguards in place to protect student data, including personally identifiable information stored or transferred by the District.

- Dual Network Firewalls
- Access to all systems/applications is made via secure login credentials (passwords and usernames)
- Yearly training to staff and students on proper security procedures
- Remote encryption for highly sensitive information (Human Resource/Payroll applications)
- World Wide Web Content/Monitoring Filters
- Remote Backup/Restore
- LAN/WAN Security
  - All campuses form links in a logical hub and spoke topology. All WAN connections are fiber optic links between the elementary schools and the main HS/MS campus with 1.0 Gigabit per second connectivity. All WAN services connect to the Lower Hudson Regional Information Center (LHRIC) in Harrison NY via Verizon TLS. The TLS service operates at 100 Megabits per second (100MB/s). The TLS "cloud" also provides connectivity to the LHRIC for many key services such as remote back up, Windows update, Symantec Anti Virus, Intrusion Prevention System, Firewalls, VPN remote access, web content filtering and monitoring, server monitoring, Infinite Campus, eChalk, Finance Manager, DNS, and vulnerability scanning. The district maintains its own firewall above and beyond that provided by LHRIC
- Wireless Security
  - Security is provided using Wired Equivalent Privacy (WEP) and Wi-Fi protected Access (WPA) authentication methods.

(6) New York State, through the New York State Education Department, collects a number of student data elements for authorized uses. A complete list of all student data elements collected by the State is available for public review, at:

- [http://www.p12.nysed.gov/irs/data\\_reporting.html](http://www.p12.nysed.gov/irs/data_reporting.html)
- <http://data.nysed.gov/>
- <http://www.p12.nysed.gov/irs/sirs/documentation/nyssisguide.pdf>

- (7) Parents have the right to submit complaints about possible breaches of student data or teacher or principal APPR data. Any such complaint must be submitted, in writing, to:

Mr. Michael A. Tromblee, Director of Technology, 18 Franklin Place, Pelham NY, 10803. 914-738-8110. [mtromblee@pelhamschools.org](mailto:mtromblee@pelhamschools.org)

### **Supplemental Information for Third-Party Contracts**

The District is still compiling the information required to complete this section and will provide further information when this section is completed and available. If you have specific questions about Third Party Contracts, please contact the District Data Privacy Officer, Michael Tromblee, 18 Franklin Place, Pelham NY, 10803. 914-738-8110. [mtromblee@pelhamschools.org](mailto:mtromblee@pelhamschools.org)