



There's a new role in your district - Data Protection Officer...Now what?

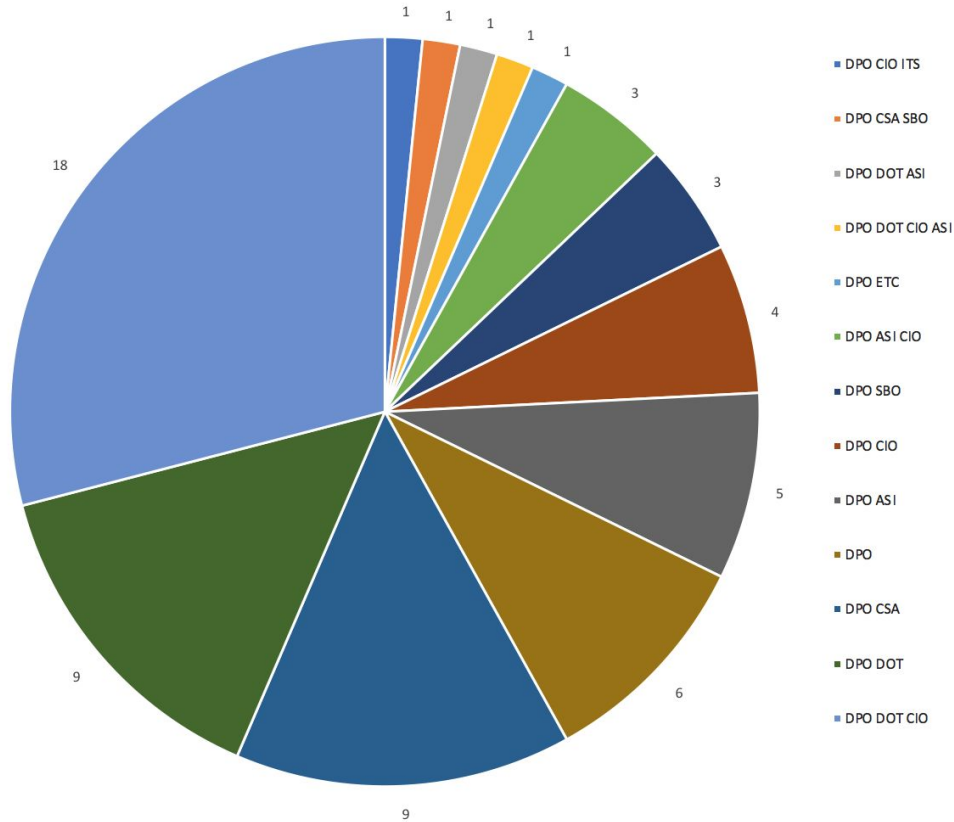
Resource Review

[Data Protection & 2020-2021 Planning](#)

[RIC One DPSS Resources Page](#)



Who is the DPO?



ROLE	NUMBER
DPO CIO ITS	1
DPO CSA SBO	1
DPO DOT ASI	1
DPO DOT CIO ASI	1
DPO ETC	1
DPO ASI CIO	3
DPO SBO	3
DPO CIO	4
DPO ASI	5
DPO	6
DPO CSA	9
DPO DOT	9
DPO DOT CIO	18
Region Total	62

What you need to do...

Review the requirements

Form a team

Prioritize the work - PM Tool Page 22

Begin...

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION (PII)



Protect the confidentiality of student PII (as defined in FERPA) and certain teacher and principal PII (confidential APPR data)

PARENTS' BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY



Develop and post, on the agency's website, a Parents Bill of Rights with supplemental information about each agreement with a third-party contractor that involves disclosure of PII

DATA SECURITY AND PRIVACY POLICY



Adopt and post a Data Security and Privacy Policy that includes adherence to the NIST Cybersecurity Framework to protect PII

NIST CYBERSECURITY FRAMEWORK



Apply the planning, processes, and categories of information protection defined within the NIST Cybersecurity Framework to district practices

THIRD-PARTY CONTRACTS



Whenever a contractor receives protected PII, ensure that the agreement for using the product or services (or, an addendum to that agreement) includes required language

ANNUAL EMPLOYEE TRAINING



Deliver annual privacy and security awareness training to all employees with access to protected data

UNAUTHORIZED DISCLOSURE COMPLAINT PROCEDURES



Create and publish a complaint process

INCIDENT REPORTING AND NOTIFICATION



Follow reporting and notification procedures when a breach or unauthorized disclosure occurs

DATA PROTECTION OFFICER



Appoint a Data Protection Officer to oversee implementation of Education Law 2-d responsibilities

DPO Governing Authority

Board of Ed Privacy Policy
Complaints



NYSED Contact for Breach
Report to Board of Ed

HUMAN RESOURCES

Employee Training

BUSINESS OFFICIAL

Bldg Principals
ASI, SPED Director

Third-Party Vendors
Supplemental
Information

DOT

NIST CSF
Incident Response
Third-party Vendors

DPO Role...Protection of PII

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION (PII)



Protect the confidentiality of student PII (as defined in FERPA) and certain teacher and principal PII (confidential APPR data)

WHAT DOES THIS MEAN...

Page 5
Overview
Toolkit



DPO's Role...Data Privacy Security Policy



10/1/2020

WHAT DOES THIS MEAN...

Approved by district Board of Education
Posted on District Website
Provided to all employees who have
access to PII

Page 10

[Overview](#)

[Toolkit](#)

[NYSED Draft Policy](#)

[Erie 1 Policy Service](#)

[SBA Policy Service](#)



DPO's Role...Parents' Bill of Rights

PARENTS' BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY



Develop and post, on the agency's website, a Parents Bill of Rights with supplemental information about each agreement with a third-party contractor that involves disclosure of PII

WHAT DOES THIS MEAN...

Review your current PBOR

Update as needed

Modify to include signature for vendors

Supplemental information

Page 6 - 9

PBOR: Appendix 32 - 36

Supplemental Info Appendix: 36 - 38

[NYSED Sample PBOR](#)



DPO's Role...Third-Party Contracts



WHAT DOES THIS MEAN...

BOCES / LHRIC Contracts

District Contracts

Click through / Freeware

Page 13-14

Appendix 26 - 30 Sample
Contract Addendum

[Toolkit - contract checklist](#)



DPO's Role...What goes where?

PARENTS' BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY



Develop and post, on the agency's website, a Parents Bill of Rights with supplemental information about each agreement with a third-party contractor that involves disclosure of PII

Posted on District Website

- Included w/vendor signature line for third-party contracts (Pii, Evaluation data)
Posted on Website as part of district inventory
- **Supplemental information** posted on website as part of district inventory.
includes info on Purpose, Protection, Disposal, Correction, Location, Encryption

THIRD-PARTY CONTRACTS

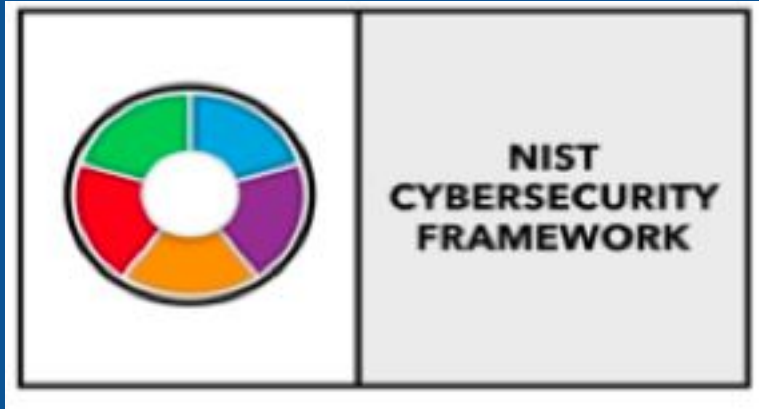


Whenever a contractor receives protected PII, ensure that the agreement for using the product or services (or, an addendum to that agreement) includes required language

- Include PBOR w/vendor signature line for third-party contracts (Pii, Evaluation data)
- Include information on compliance with Ed Law 2-d requirements
- Include supplemental information.



DPO's Role...NIST Cybersecurity Framework



WHAT DOES THIS MEAN...

MITS and Collaborative Support
Responsibility of the district
Review Controls that relate to LHRIC
support of district

Page 11-12



DPO's Role...Annual Employee Training



WHAT DOES THIS MEAN...

Calendar year?
School year?
12-month period?

**Federal and State Regulations
Cybersecurity Awareness Training
District Policy**

Online PD Onsite PD

Page 15
Overview
Toolkit



DPO's Role...Complaint Procedure

UNAUTHORIZED DISCLOSURE COMPLAINT PROCEDURES



Create and publish a
complaint process

WHAT DOES THIS MEAN...

Page 16-17



DPO's Role...Incident Response Reporting

INCIDENT REPORTING AND NOTIFICATION



Follow reporting and notification
procedures when a breach or
unauthorized disclosure occurs

WHAT DOES THIS MEAN...

Page 18-19



10/1/2020

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DO NOW....

- **Data Privacy and Security Policy - October 1, 2020**
- Parents' Bill of Rights
- Third-party Vendor Contract Negotiations
- Annual Employee Training
- Complaint Procedure
- Incident Response Plan
- NIST Cybersecurity Framework Assessment



Resources / Support

- Publicly Available Resources - ALL DISTRICTS
- RIC One DPSS
 - Inventory Tool
 - Online PD
 - Digital Digests
 - Digital Blasts
 - Digital Debriefs
 - Incident Response Plan
 - NIST CSF Guides
 - Webinars
 - and more...
- DPO Mentoring Service - 60 hours of consultant time
- DPO Support Service - 35 days of consultant time

Welcome to RIC One DPS

DPSS Subscribing Districts...

- Monthly webinars on the requirements
- Details and schedules to follow