

**ADOPT A NEW POLICY ON STUDENT ONLINE PERSONAL PROTECTION**

**THE CHIEF EXECUTIVE OFFICER RECOMMENDS THE FOLLOWING:**

effective July 1, 2021. The policy was posted for public comment from October 2, 2020 to November 2, 2020.

**PURPOSE:** The state SOPPA law requires school districts to adopt a policy regarding the use of education technology products or applications. SOPPA is intended to ensure that student data will be protected when it is collected by educational technology companies and that the data may be used for beneficial purposes such as providing learning and innovative educational technologies. SOPPA requires: that school districts only use educational technologies that meet the following criteria: have been approved under this policy; all agreements between the Board and the provider are posted on district's website, and all of the data

~~purchase, political affiliations, religious information, text messages, documents~~

student identifiers, search activity, photos, voice recordings, or geolocation information.

d. **Department/School Management** refers to the supervisor, manager, director, officer,

~~Principal, Network Chief, Chief Counsel, Chief of Police, Chief of Security, Chief of~~

or office or school to implement policy compliance requirements.

2. Publicly disclose material information about its collection, use, and disclosure of covered information with a privacy policy.
  3. Limitations on a student's covered information.
    - a) A student's covered information shall be collected only for pre-K through 12 school purposes and not further processed in a manner that is incompatible with those purposes.
    - b) A student's covered information shall only be adequate, relevant, and limited to what is necessary in relation to the pre-K through 12 school purposes for which it is processed.
  4. Notify the school of any breach of the students' covered information no later than 30 calendar days after the determination that a breach has occurred.
- b. Operators are prohibited from:
1. Engaging in targeted advertising.
  2. Using information including persistent unique identifiers, created or gathered by the operator's site, service, or application to amass a profile about a student.

4. Disclosing covered information, except for circumstances allowable under the SOPPA policy.

**REQUIREMENTS FOR APPROVING AUTHORIZED SOFTWARE**

- a. Department/School Management may initiate an approval request for authorized software to meet an educational or operational need. The request will go through the following onboarding process.
  1. Initial Screening - The CEO or designee will create a minimum standard for software to be authorized (educational purpose and IT security).
  2. The onboarding process requires the reviews of the software by the following Departments:
  3. Education Technology - a further review of Ed-Tech Operations to determine if an

- d) Procurement - Create operator/sponsorship in CPS vendor database.
- e) Risk - Review operator's background check and insurance policy.

- b. The Chief Educational Officer and Chief Procurement Officer, or their respective designee are the only individual who are authorized to enter into a written agreement with operators in accordance with Delegation of Authority to Act as set forth in Chapter VII of the Board Rules in accordance with Delegation of Authority to Act as set forth in Chapter VII of the Board Rules. All agreements must be in writing and approved by the General Counsel or

- to legal form. Any agreement entered into by employees other than those listed above is in violation of SOPPA is void and unenforceable.
- c. All operators must have an agreement executed by the authorized district signatories



LEGAL REFERENCES: Student Online Personal Protection Act, 105 ILCS 85/1.

Approved for Consideration:

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