



June 2015

**Student Data Policy and Confidentiality**

The Provider (Social Studies School Service and/or Nystrom Education) will maintain the confidentiality of any and all student data obtained from your district. To ensure the continued confidentiality and security of the student and staff data processed, stored, or transmitted, the Provider shall establish a system of safeguards that will at minimum include the following:

- a. The Provider shall develop, implement, maintain and use appropriate administrative, technical and physical security measures to preserve the confidentiality, integrity and availability of all data, including electronically-maintained or transmitted data received from, or on behalf of your district. These measures will be extended by contract to all subcontractors used by the Provider.
- b. The Provider and its employees, subcontractors and agents involved in the handling, transmittal, and/or processing of data provided will be required to maintain the confidentiality of all student and staff-related personally identifiable information.
- c. Procedures and systems that shall require the use of secured passwords to access computer databases used to process, store, or transmit data.
- d. Procedures and systems, such as good practices for assigning user names and passwords, shall be developed and implemented to maintain the integrity of the systems used to secure computer databases used to process, store, or transmit data provided. Options are available to shield user data including the use of fictitious user names when desired.
- e. Procedures and systems that ensure that all confidential student and staff data processed, stored, and/or transmitted shall be maintained in a secure manner that prevents the interception, diversion, or other unauthorized access to said data.
- f. The procedures and systems developed and implemented to process, store, or transmit data provided shall ensure that any and all disclosures of confidential student and staff data comply with all provisions of federal (HIPAA, FERPA, E-Government, etc.) and state laws relating to the privacy rights of students and staff as such laws are applicable.
- g. The Provider will review database records following each school year and expunge all student data.

Questions regarding these policies and procedures can be addressed to:

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