**21st Century Community Learning Centers**

**Data Usage Guidelines**

Last Updated: September, 2013

**I. PURPOSE**

The purpose of this document is to ensure that:

1. Information in your database files are protected from improper access and use following the

guidelines set forth in the Family Educational Rights and Privacy Act (FERPA);

2. Prevention of the inappropriate and unauthorized disclosure of information and

avoidance of adverse legal consequences;

3. The user community is informed about confidentiality, privacy, and acceptable use

of data.

**II. DEFINITIONS**

The document will offer guidelines for you. It is your responsibility to follow local district policies and procedures with regard to usage of student records and is it strongly suggested to use the guidelines and information put forth in this document.

A guideline is typically a collection of system specific or procedural specific

“suggestions” for best practice. They are not requirements to be met, but are

strongly recommended. Effective security policies make frequent references to

standards and guidelines that exist within an organization.

**FERPA**

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part

99) is a Federal law that protects the privacy of student education records. The law applies

to all schools that receive funds under an applicable program of the U.S. Department of

Education. You must follow FERPA requiremernts in accordance with Federal law.

**III. PASSWORD CONTROLS**

Once in FileMaker Pro, viewable sections of the database are password controlled. There are three levels of entry.

Manager Level:  Gives Access to everything including confidential data (IEP, ESL, Free/Red lunch)  
Who:  Data manager at project level designated by school district and/or fudiciary. There should be only one manager level user for each 21 CCLC project.  
  
User level: No access to confidential info.  
Who: Staff who are entering and using data but do not have a need to view confidential information  
  
Student level:  Access to sign in/sign-out page  
Who:  Students who sign themselves in alone or under supervision

When opening the 21st Century database, you will be prompted for an account name and a password.

Be sure to overwrite the default Account Name that is entered automatically.

Passwords are case sensitive.

In Filemaker, Passwords can be changed by going to file/change password.

**Tip**: You may need to put the cursor in the Name field and erase a backspace at the beginning of the password field. ( Make sure there are no spaces in your passwords i.e. blank spots that the program reads)

**Tip**: Guard your password and write it down in a secure location, not on your wall or computer.

**IV. ACCEPTABLE USE OF DATA**

**Examples of Acceptable Use include:**

1. Use of the 21 C database for data analysis as it relates to the evaluating and reporting duties of your position.

**Examples of Unacceptable Use include:**

1. Emailing reports or saving a shared query with student identifying information;

2. Leaving a screen with confidential information open or accessible on an unattended desktop;

3. Sharing information ( verbally or on the screen) with other people who are not authorized to hear or see it

*For example, talking to co worker or parent informally and saying, “Well, Amber is a free and reduced lunch kid…” is violating that child’s and her parents’ rights.*

4. Accessing information that you are not authorized to view;

5. Accessing information that you have authorization to, BUT for inappropriate

reasons, e.g. looking up a neighbor’s children’s attendance records;

6. While someone else is using a computer, you want to check something. You ask them to log in, giving them your password to type in for you;

7. Lack of diligence in securing user names or passwords (i.e. leaving password

written under keyboard, or using a password that is easy to guess. e.g. your child’s

or pet’s name.

**THE ABOVE ACCEPTABLE AND UNACCEPTABLE USE EXAMPLES ARE JUST**

**THAT, EXAMPLES, AND DO NOT COMPRISE A COMPLETE LIST.**

Please note that school districts are not subject to the Freedom of Information Act. VT

public record law says that school districts need only provide access to existing non-confidential

reports. FERPA protects reports if they contain confidential information. School district

staff should escalate requests to their Superintendent Office who will confer with attorneys as needed.

**I. SECURITY OF THE 21 CCLC Database**

The guidelines described are the minimum recommended action steps, while the

Best Practices assume the Minimum Standards are met. (For below)

**PASSWORD PROTECTION:**

The following highlights the Minimum Standards and Guidelines / Best Practices to follow

regarding password usage.

**Minimum Standards:**

Minimum password standards dictate that passwords:

1. ARE used (do not leave your password blank)

2. ARE changed at least every 90 days

3. ARE NOT the word “password”

4. ARE NOT the same name as your user account

5. ARE NOT used more than one time within the past 5 password changes

6. ARE NOT changed more than once per day

**Guidelines / Best Practices:**

Common passwords, based on letters and numbers can typically be recovered in about a day using the default character set A-Z and 0-9. Complex passwords, on the other hand, that use characters such as #\_}\* may take up to hundreds of days to crack on the same machine, using a comprehensive character set. See the link for examples of password cracking: http://www.mcmaster.ca/cis/ITsecurity/passwordcracking.htm

It is important to realize that short passwords, and easily guessed longer passwords, are

virtually useless. If you haven't changed your approach to passwords in the last few years, this might be a good time to do just that -- and to look at the tools that make generating and using even very long, highly-secure passwords much easier. If you'd rather keep your password-generation local and offline, use the open source "PWGen for Windows” at http://pwgen-win.sourceforge.net or RoboForm at http://www.roboform.com.

In summary, it is Best Practice to use a password that:

1. IS NOT a word found in the dictionary

2. IS a combination of letters and numbers

3. IS a combination of upper and lower case letters

4. IS a minimum of 6 characters

5. IS never saved when prompted to ‘Remember Password’.

**COMPUTER PROTECTION:**

The following highlights the Minimum Standards and Best Practices to proactively protect your computer from a security breach, which would otherwise lead to a potential security breech.

**Minimum Standards:**

1. Ensure that current anti-virus and current signature files (daily definition updates)

are installed.

2. Don't open e-mail or attachments from people you don't know or are not expecting

e-mail from – especially if the e-mail contains an attachment. If you are not sure of

the sender delete the message.

3. Enable real-time e-mail scanning by your virus checker.

4. If supported, configure browser to not save username/password cookies.

5. Use the screen saver capability of desktop to automatically lock desktop after 5

minutes of inactivity.

6. Do not place the database on a computer owned by an employee.

**Guidelines / Best Practices:**

1. Install a high quality firewall on your PC (PC is used to identify a personal computer,

be it an IBM-compatible PC or an Apple PC);

2. When directed by your IT staff, update the Operating System (i.e. Windows, OS X)

with most current patches;

3. Do NOT setup your email Inbox for AutoPreview or Preview Pane. This could

cause your system to become infected if there is a virus in the message body;

4. Run Anti-Spyware software; We strongly encourage you to implement similar protections on your home computers.

**FERPA SUMMARY**

FERPA gives parents certain rights with respect to their children's education records.

These rights transfer to the student when he or she reaches the age of 18 or attends a

school beyond the high school level. Students to whom the rights have transferred are

"eligible students." Parents or eligible students have the right to inspect and review the student's education records maintained by the school. Schools are not required to provide copies of records unless, for reasons such as great distance, it is impossible for parents or eligible students to review the records. Schools may charge a fee for copies.

Parents or eligible students have the right to request that a school correct records which

they believe to be inaccurate or misleading. If the school decides not to amend the record, the parent or eligible student then has the right to a formal hearing. After the hearing, if the school still decides not to amend the record, the parent or eligible student has the right to place a statement with the record setting forth his or her view about the contested information.

Generally, schools must have written permission from the parent or eligible student in

order to release any information from a student's education record. However, FERPA

allows schools to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.311):

1. School officials with legitimate educational interest;

2. Other schools to which a student is transferring;

3. Specified officials for audit or evaluation purposes;

4. Appropriate parties in connection with financial aid to a student;

5. Organizations conducting certain studies for or on behalf of the school;

6. Accrediting organizations;

7. To comply with a judicial order or lawfully issued subpoena;

8. Appropriate officials in cases of health and safety emergencies; and

9. State and local authorities, within a juvenile justice system, pursuant to specific

State law. Schools may disclose, without consent, "directory" information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, schools must tell parents and eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the school not disclose directory information about them. Schools must notify parents and eligible students annually of their rights under FERPA. The actual means of

Please review the regulations at http://www.ed.gov/policy/gen/reg/ferpa/index.html for the specific conditions.

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**Title 34--EDUCATION**

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**Appendix A to Part 99--Crimes of Violence Definitions**

**Authority: 20 U.S.C. 1232g, unless otherwise noted.**

**Source: 53 FR 11943, Apr. 11, 1988, unless otherwise noted.**

**IX. Other Guidelines**

1. All users who log into the database file as a manager or user and have access to the database file and confidential information should have signed an Acceptable Use Agreement that states that they have read local policies and procedures, and have had a chance to have questions answered. Areas covered in this document could be a part of a signed agreement.

2. Sample Acceptable Use Agreements can be requested from the 21c State Coordinator.

3. For 21c Federal reporting, aggregate data is reported for IEP, free/reduced lunch, and ESL/LEP status. Individual names are never attached to these data, but aggregate numbers are reported annually.

4. 21c Data is reported annually in yearly databases that use summer and school year data; ( July 1-June 30th . It is acceptable to start each year in June if programs happen then.. i.e ( June 20-June 20th each year).

5. You are responsible to follow FERPA and local Supervisory Union policies. Detailed questions about data usage should be directed to the Superintendent and/or legal counsel.