



# First Steps in Data Governance

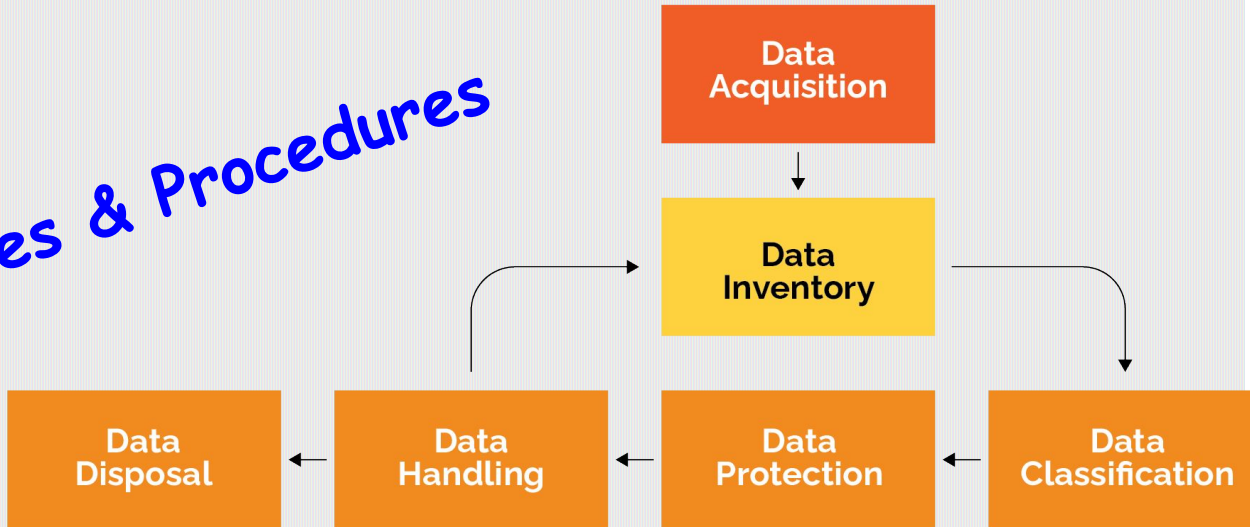
Connie Coy, MOREnet  
Sonia Kesselring, Lindbergh Schools



# What Is Data Governance?

## » Data Lifecycle

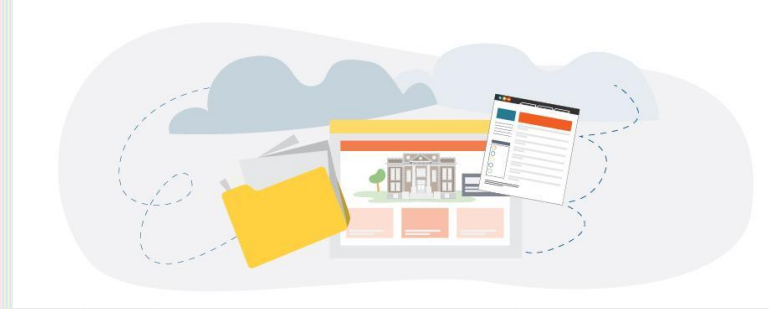
*Policies & Procedures*



# Privacy Best Practices

<https://www.more.net/privacy-best-practices/>

- Data Plan/Policies
- Data Acquisition
- Data Inventory
- Data Classification
- Data Mapping
- Data Protection
- Data Handling
- Data Retention/Destruction



# Data Governance Plan

- People
- Vision and goals
- Applicable Laws
- District Policies
  - [Step 1 on MOREnet Privacy Best Practices](#)
- Best Practices
  - [CIS Controls](#)



# Data Governance Plan

- [NCES](#) – National Center for Education Stats
- [MU Library Data Management Plan Overview](#)
- [Raytown Schools Data Governance Manual](#)
- [CIS Control Data Management Policy Template](#)
- [Colorado Dept of Ed Sample Policies](#)

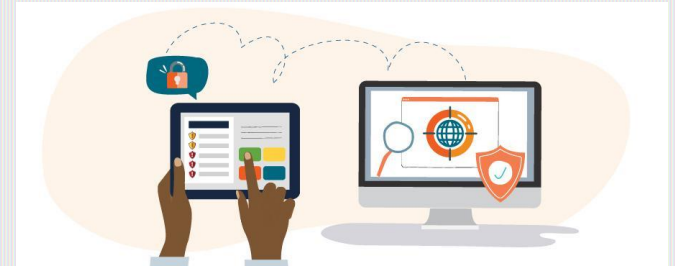


# Data Acquisition

- What key policy questions are you trying to answer with the data?
- What data types and elements are needed to answer the questions?
- How are you going to acquire the data?
  - Already collect or new data?

# Data Inventory - Catalog

- Inventory
  - [Step 2 on MOREnet Privacy Best Practices](#)
    - Data Inventory Tool



# Data Privacy Classification

- High, Med, Low
  - Public, Sensitive, Confidential, Internal
  - [Step 3 on MOREnet Privacy Best Practices](#)
- 
- Data Owner - Senior management
    - In charge of data in a domain
  - Data Custodian - IT Professional
    - Specific data set
    - Develop & maintain security safeguards



# Data Classification

- Information Security related records:  
*“This document is closed under RSMo 610.021 Section 21”*

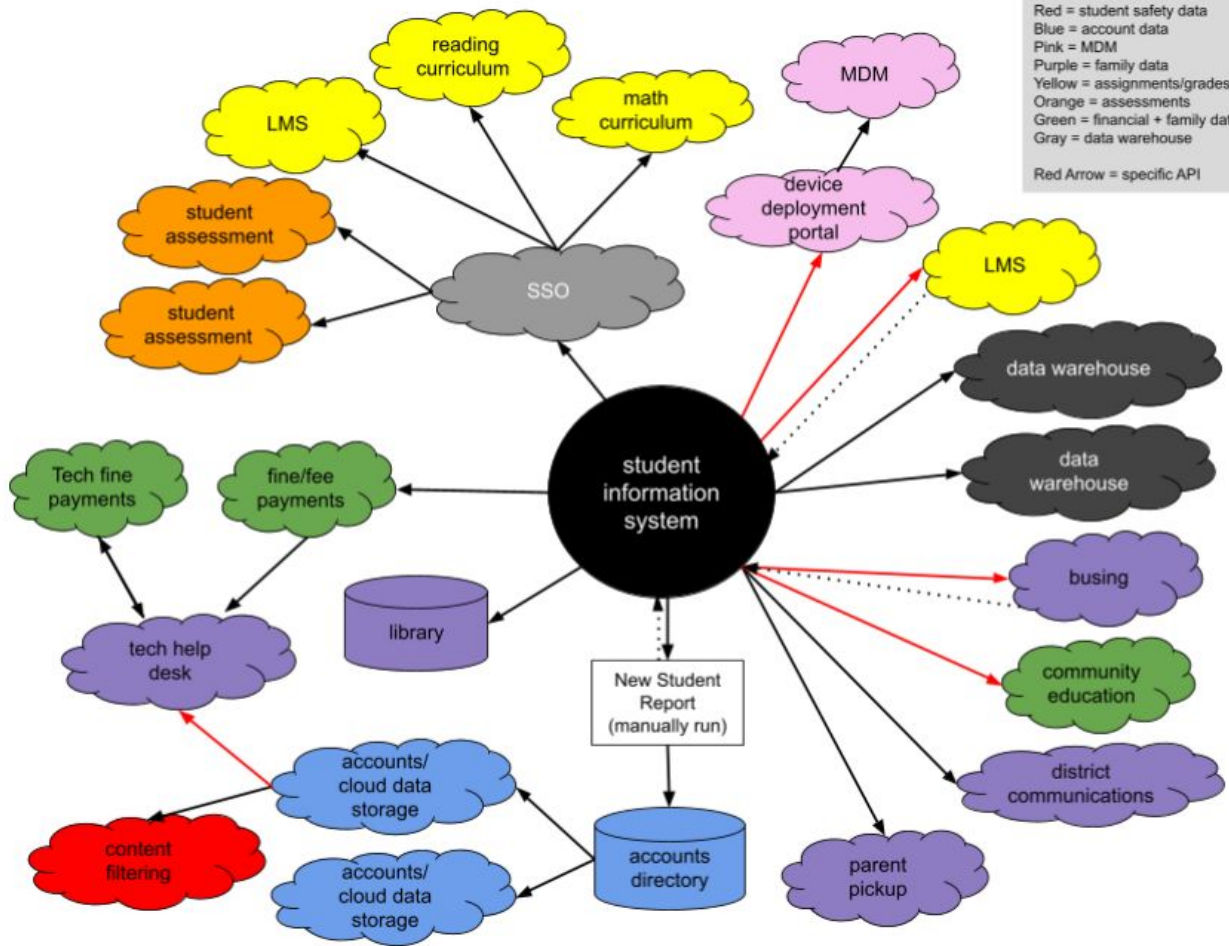
# Data Mapping

- [Step 4 - Mapping Data](#) - Visually mapping data flows
  - Privacy Protections
  - Security Requirements
  - Breach Notification
  - Consent Requirements
- [How Monitoring Works](#) - Parents



# Student Data Map

Red = student safety data  
Blue = account data  
Pink = MDM  
Purple = family data  
Yellow = assignments/grades  
Orange = assessments  
Green = financial + family data  
Gray = data warehouse  
Red Arrow = specific API



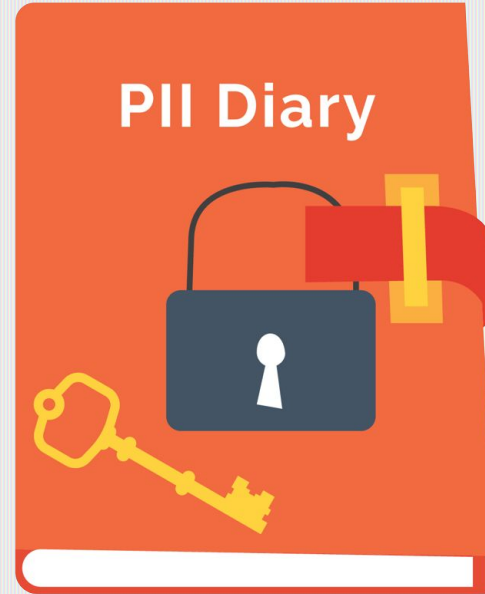
# Data Protection

- Need to Know Basis
- Encryption
- Threat Monitoring
- Privacy Agreements

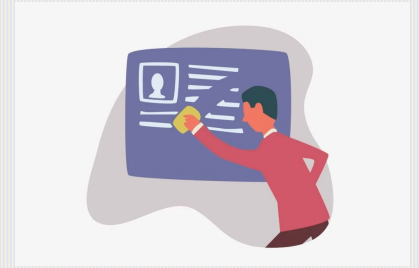


# Data Handling

- Archive
- On Site
- Off Site
- Cloud
- [Network Backup](#)
- Retention
- Ongoing Training



# Data Retention



- Mandated Retention Guidelines
  - <https://www.sos.mo.gov/CMSImages/LocalRecords/PublicSchool.pdf>  
(Student records category: **page 27+**)
  - <https://www.sos.mo.gov/CMSImages/LocalRecords/General.pdf>
  - <https://www.sos.mo.gov/CMSImages/LocalRecords/Library.pdf>
  - <https://www.sos.mo.gov/archives/localrecs/schedules>
  - **Contact for state records spreadsheet: [info@sos.mo.gov](mailto:info@sos.mo.gov)**

# Data Retention Student Records

**RECORDS APPRAISAL & MANAGEMENT PROGRAM**
**QUICK DISPOSITION GUIDE**

<b>NON-RECORDS</b>	<b>ONE YEAR OR LESS</b>	<b>ONE TO SIX YEARS</b>	<b>MORE THAN 7 YEARS</b>	<b>PERMANENT</b>
				
<ul style="list-style-type: none"> <li>● ITEMS OF NO LEGAL, ADMINISTRATIVE, FISCAL OR HISTORICAL VALUE</li> <li>● DRAFTS</li> <li>● ROUGH NOTES</li> <li>● EXTRA COPIES</li> </ul>	<ul style="list-style-type: none"> <li>● ATTENDANCE ROLLS</li> <li>● PERMISSION &amp; PASSES</li> <li>● STUDENT DISCIPLINE</li> <li>● SURVEILLANCE RECORDINGS</li> <li>● WORKING FILES</li> <li>● INVENTORY RECORDS</li> <li>● INTERNAL COMMITTEE RECORDS</li> <li>● TRANSITORY CORRESPONDENCE</li> </ul>	<ul style="list-style-type: none"> <li>● DEAD FILES (3)</li> <li>● PAYROLL PROCESS (3)</li> <li>● PERFORMANCE &amp; TESTING (3)</li> <li>● SECTION 504 STUDENT RECORDS (3)</li> <li>● STUDENT MEDICAL LOGS (3)</li> <li>● TIMEKEEPING (3)</li> <li>● ACCOUNTS PAYABLE (4)</li> <li>● BUDGET RECORDS (4)</li> <li>● ENROLLMENT &amp; REGISTRATION (4)</li> <li>● SPECIAL EDUCATION RECORDS (5)</li> </ul>	<ul style="list-style-type: none"> <li>● ADMINISTRATIVE CORRESPONDENCE (7)</li> <li>● GRANT RECORDS (7)</li> <li>● INVESTIGATION RECORDS (7)</li> <li>● AUDIT WORK PAPERS (10)</li> <li>● CIVIL CASE FILES (10)</li> <li>● FIXED ASSETS (10)</li> <li>● PROGRAM &amp; PROJECT ANALYSIS (10)</li> <li>● SCHOOL GENERAL LEDGERS (10)</li> <li>● INSURANCE CLAIMS (12)</li> <li>● EMPLOYEE WAGE RECORDS (65)</li> </ul>	<ul style="list-style-type: none"> <li>● ARTIFACTS</li> <li>● AUDIT RECORDS</li> <li>● SPORTS TEAMS RECORDS</li> <li>● STUDENT ACADEMIC RECORDS</li> <li>● CLOSED MEETING RECORDS</li> <li>● GRADUATION &amp; TRANSCRIPT</li> <li>● GRADUATION PROGRAMS</li> <li>● HISTORIAN BOOKS</li> <li>● MEETING MINUTES</li> <li>● OFFICIAL REPORTS</li> <li>● PUBLIC MATERIALS</li> <li>● PUBLIC RELATIONS</li> <li>● PUBLICATIONS</li> <li>● SCHOOL HISTORIES</li> <li>● STUDENT HISTORY</li> <li>● TRAINING AIDS</li> </ul>
 <p style="text-align: center; margin-top: 10px;"> <b>STATE ARCHIVES</b>            801-531-3863            RECORDSMANAGEMENT@UTAH.GOV         </p>	<p style="font-size: small;">☑ DISPOSE 1 YEAR AFTER RESOLUTION, OR ISSUE IS SUPERSEDED</p> 	<p style="font-size: small;">☑ SEE STATE ARCHIVES FOR SPECIFIC DISPOSITION SCHEDULE</p> 	<p style="font-size: small;">☑ SEE STATE ARCHIVES FOR SPECIFIC DISPOSITION SCHEDULE</p> 	

PLEASE REFER TO STATE ARCHIVES FOR SPECIFIC SCHEDULE LENGTHS, AND RECORD DISPOSITION NOTES. THIS IS DESIGNED TO BE A QUICK GLANCE GUIDE FOR THE MOST USED RECORD TYPES. ADA Compliant 5/2021

# Data Retention - MO Public School

B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
Office	Department	RecordSeriesTitle	AlsoCalled	Function	Content	Retention (years)	Disposition		Note	Approval Date	Position Responsible	Current Person Responsible	Current Location	Backup Location	System	Media Type
PUBLIC SCHOOL DISTRICT (COUNTY)	Health	Health Care Plans		Summary of the nursing plan of care for a student with special health needs.		1 year	Destroy		Evaluate annually--may be a part of the Individualized Education Program--IEP							
PUBLIC SCHOOL DISTRICT (COUNTY)	Health	Head Injury Note		Documents any head injury sustained by student at school.		1 year	Destroy		Need only be kept for the current year if the information contained within the document has been summarized and recorded onto the individual clinic record or onto the cumulative health record							
PUBLIC SCHOOL DISTRICT (COUNTY)	Health	Daily Clinic Log		Listing of all students seen on any given day		1 year	Destroy		This record is not considered to be adequate to document individualized care. Need only be kept for the current year if the information contained within the document has been summarized and recorded onto the individual clinic record or onto the cumulative health record							
PUBLIC SCHOOL DISTRICT (COUNTY)	Athletics	Athletic Conference Reports				1 year	Destroy									
PUBLIC SCHOOL DISTRICT (COUNTY)	Extracurricular	Eligibility Certificates		Document student eligibility to engage in extracurricular activities.		1 year	Destroy		These are now accessed and completed online through MSHAA							
PUBLIC SCHOOL DISTRICT (COUNTY)		Events Schedules				1 year	Destroy									
PUBLIC SCHOOL DISTRICT (COUNTY)	High School	Scholarship Awards				1 year	Destroy									
			Commenceme													





# Data Retention - MO Library Records

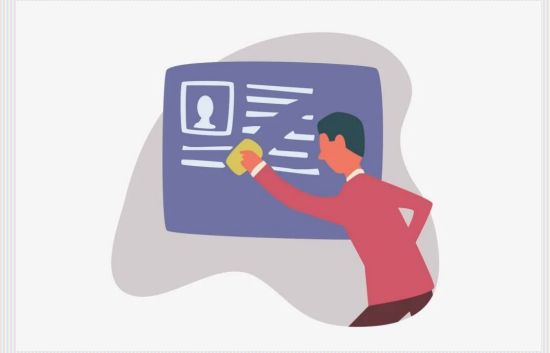
## Library Records

Non-Records	One Year or Less	More than One Year	Permanent
Identical copies of documents in same file. Extra copies of printed or processed materials.	Circulation Records – Personal: Until materials have been returned and all fines/fees PIF or uncollectable.	Borrower Registration File Expire +2 years	Special Collections/Accessions/Deaccessions
Superseded materials. Documents on employee fringe activities. (blood donors)	Daily Sign-in/Sign-Up Records Retain until stat information recorded	Circulation Records 2 years; Stats Permanently	Government – Year End reports; minutes; property records; birth, death, marriage records.
Work papers and drafts of reports/correspondence. Transcribed steno materials.	Interlibrary Loan Files: Retain until transaction complete.		
Blank forms	Inventory File: Retain until superseded		
Activities that require no action.			
Survey forms.			



# Data Deletion and Destruction

- Federal/State/District/GDPR
- On Prem/Network Drives
- Mobile - USB, laptops
- Off site
- In Cloud - Google Drive, DropBox
  - NDPA has Exhibit D – Directive for Disposition of Data
  - Student Privacy Ed – [Best Practices for Data Deletion](#)
- Email
- Pilots that used actual data
- Student Moves/Inactive accounts



# FERPA Compliance

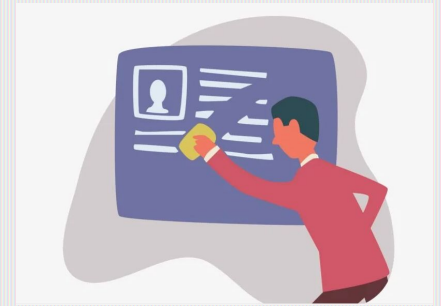
- Data collect or maintain themselves
  - No requirements for destruction
- School may not destroy records if request for access is pending.
  
- School official exception
  - Maintain direct control
- Studies or Audit/Evaluation exception
  - Written agreement with time period of destruction

[US Dept of Ed - Best Practices for Data Destruction](#)



# Deletion Isn't Destruction

- Clearing - Overwriting or formatting
- Purging - Removing data through physical or logical means
- Destroying - Medium is unusable
- Third party - Confirmation
- Encryption - last resort



# Summary

- Data Plan/Policies
- Data Acquisition
- Data Inventory
- Data Classification
- Data Mapping
- Data Protection
- Data Handling
- Data Retention/Destruction

# Data Management

- Data Records
  - De-Identify PII data when possible
    - [https://fpf.org/wp-content/uploads/2017/06/FPF\\_Visual-Guide-to-Practical-Data-DeID.pdf](https://fpf.org/wp-content/uploads/2017/06/FPF_Visual-Guide-to-Practical-Data-DeID.pdf)
- Data Quality
  - Processes in place to ensure data is accurate, complete, timely, and relevant
- Data Access
  - Limit staff access to only data required to fulfill job duties
  - Security trainings and confidentiality agreements required for staff with PII access privileges.

# Data Management continued..

- Data Security and Risk Management
  - Policies in place for data exchanges and reporting with educational inst., researchers, etc.
  - DPA
  - Rounding and cell suppression – Public aggregate reports
  - Internal coding – secure coding practices
    - <https://www.codingdojo.com/blog/secure-coding-practices>

# Data Mapping Exercise

Map the data sources, path, uses  
Examine for holes in data links and  
protections

How can this be used?



# Mapping Exercise Discussion

- Challenges
- First Steps
- Add network specifics/partner with network diagram
- When can this map be used?

# Tools and Resources

- [Data Management Policy Template - CIS](#)
- PTAC
  - [Data Governance](#)
  - [Data Governance Checklist](#)
  - [FERPA Exceptions Summary](#)
  - [Best Practices for Data Deletion](#)
- Future of Privacy Forum/Student Privacy Compass
  - [Student Privacy Primer for School Leaders](#)
  - [FPF Youth & Education Privacy](#)
  - [Student Privacy Compass](#)
- [CoSN](#)

# Tools and Resources

- [FERPA 101 for Higher Education](#)
- [Data Governance for HE Institutions](#)
- [Library Records -State Privacy Laws](#)
- [Missouri Public Library Resources - SOS](#)

# MOSPA

- [Missouri Student Privacy Alliance](#)

# QUESTIONS?



Thank you!

Connie Coy - MOREnet [coy@more.net](mailto:coy@more.net)

Sonia Kesselring - Lindbergh Schools  
[soniakesselring@lindberghschools.ws](mailto:soniakesselring@lindberghschools.ws)

