

PARENTS BILL OF RIGHTS FOR DATA PRIVACY AND SECURITY

Erie 1 BOCES

Erie 1 BOCES is committed to protecting the privacy and security of student, teacher, and principal data. In accordance with New York Education Law § 2-d, the BOCES wishes to inform the community of the following:

- (1) A student's personally identifiable information cannot be sold or released for any commercial purposes.
- (2) Parents have the right to inspect and review the complete contents of their child's education record.
- (3) State and federal laws protect the confidentiality of personally identifiable information, and safeguards associated with industry standards and best practices, including but not limited to, encryption, firewalls, and password protection, must be in place when data is stored or transferred.
- (4) A complete list of all student data elements collected by the State is available for public review at <http://www.p12.nysed.gov/irs/sirs/documentation/NYSEDstudentData.xlsx>, or by writing to the Office of Information & Reporting Services, New York State Education Department, Room 863 EBA, 89 Washington Avenue, Albany, New York 12234.
- (5) Parents have the right to have complaints about possible breaches of student data addressed. Complaints should be directed in writing to the Chief Privacy Officer, New York State Education Department, 89 Washington Avenue, Albany, New York 12234. Complaints may also be directed to the Chief Privacy Officer via email at: CPO@mail.nysed.gov.

Vendor Signature



Date

December 12, 2019

**Supplemental Information About a Contract Between
Erie 1 BOCES and Frontline Technologies Group LLC**

Erie 1 BOCES, on behalf of the Western New York Regional Information Center (WNYRIC), has entered into a contract with Frontline Technologies Group LLC, which governs the availability to participating school districts of the following Frontline Products or Services:

[list]

In order for participating school districts to receive the pedagogical or administrative advantages of using some or all of these Frontline Products or Services, participating school districts will provide to Frontline, and Frontline will receive, personally identifiable information about students, or personally identifiable information about teachers and principals, that is protected by Section 2-d of the New York State Education Law.

Frontline will ensure that any subcontractors, assignees, or other agents who see or receive this protected data are contractually required to obey the same data protection and security requirements that Frontline is required to obey under state and federal law.

The contract expires on June 30, 2022 unless earlier renewed or automatically extended for a 12-month period pursuant to the agreement. When the contract expires, protected data will, upon the written request of the BOCES or a participating school district, be deleted by Frontline, and may be exported for use by BOCES or a participating school district before being deleted.

Parents can challenge the accuracy of any student data stored by a school district in a Frontline Product or Service by following the school district's procedure for requesting the amendment of education records under the Family Educational Rights and Privacy Act (FERPA). Teachers and principals may be able to challenge the accuracy of APPR data stored by a school district in a Frontline Product or Service by following the appeal procedure in the school district's APPR Plan.

Protected data provided to Frontline by a participating school district will be stored in the United States. The measures that Frontline takes to protect student data and teacher and principal data will align with the NIST Cybersecurity Framework and industry best practices including, but not necessarily limited to, disk encryption, file encryption, firewalls, and password protection. Data encryption will be employed at least to the extent required by Education Law Section 2-d.



Exhibit B-3 to the
Master Services Agreement: Cost Schedule for SEI Solutions

SEI Frontline Solutions (unlimited district-wide subscription):

- IEP Direct
- RTI Direct
- Medicaid

2019/2020 Renewal Pricing

BOCES/RTC renewals of Frontline Solutions will convert to unlimited district-wide subscriptions and will be priced based upon a 10% increase to the 2018/19 pricing for the applicable Frontline Solution.