



## Dream It Do It Western New York Inc.

### Use of Subcontractors for Program Implementation Data Privacy Protection

#### Overview

Dream It Do It Western New York implements the Dream It Do It Advanced Manufacturing (DIDIAMP) initiative which is energizing and building the early talent pipeline. The initiative:

- Improves the understanding of manufacturing.
- Delivers manufacturing career exploration opportunities.
- Reinforces the core elements of a good work ethic.
- Encourages participation in manufacturing education and training tracks.
- Presents a platform for discussion among manufacturers and our educational system.
- Aligns and coordinates existing resources and capabilities.
- Provides no-cost technology resource and no fee programming to schools enabling students to connect with manufacturing careers.
- Enables stronger and meaningful connections between manufacturers and students.

#### Data Purpose

The purpose for which Dream It Do It Western New York (DIDIWNY) Inc. is being provided access to student data is:

- Enrollment in the Dream It Do It Advanced Manufacturing Program using the Tallo technology platform to enable student badging and credentialing.
- Keep enrolled students informed about DIDAMP programming/events and manufacturing career opportunities.
- Connect students to career exploration resources, scholarships, colleges and employers.
- Collection of student survey data to understand the impact of programming and events and to provide insight into program and event improvement opportunities using Survey Monkey.

#### Use of Subcontractors

DIDIWNY will use subcontractors in fulfilling its responsibilities to schools, their employees or agents, and/or educational agencies which contract with the school for the provision of contractor's products and/or services.

Please see subcontractor's policies:

- **Tallo:** Tallo is a third-party platform owned by Stride Learning Company that is used by DIDIWNY to enroll students in the Dream It Do It Advanced Manufacturing Program and for badging students for their accomplishments. Stride is a national provider of online learning in K-12 education. Strides data security and compliance details may be found here: <https://stridelearning.com/privacy-policy/>
- **Survey Monkey:** Survey Monkey is a third party platform used by DIDIWNY to conduct surveys of events in which students participate, and the platform is used for specific event registration. Survey Monkey's data security and compliance details may be found at: <https://www.surveymonkey.com/mp/data-security-and-compliance/>
- **Microsoft 365:** DIDIWNY utilizes the Microsoft 365 platform for cloud storage purposes. Microsoft 365's data privacy information can be found at: [Microsoft Privacy Statement – Microsoft](#)



[privacy](#)

## Training

DIDIWNY provides internal training to staff pertaining to PII security. DIDIWNY subcontractor's abide to data and security protection requirements as defined in their privacy policies.

**Dream It Do It Western New York:** DIDIWNY employees are required to annually participate in an internal training on the Family Educational Rights and Privacy Act (FERPA) and New York State Education Law Section 2-D. Training includes an overview of the purpose of both of these laws, the importance of protecting student data and methods by which our organization protects student data. Internal training is supplemented by US Department of Education on-line trainings and videos pertaining to protecting student privacy.

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## Safeguards

DIDIWNY subcontractors provide specific information regarding the administrative, operational, and technical safeguard they have in place to protect the PII received.

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## Data Security and Privacy Incident Management

DIDIWNY subcontractors specify measures they take to identify breaches and unauthorized disclosures.

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## Detailed Breakdown of Tallo's Compliance with Specific Provisions of New York Education Law 2-D

This is a detailed breakdown of Tallo's compliance with New York Education Law 2-D ("NY2D"), along with examples for each requirement:

### 1. Develop a Data Security and Privacy Policy

Tallo complies by maintaining a comprehensive privacy policy aligned with NY2D requirements, available publicly via the [Stride Privacy Policy](#).

#### Example:

- The policy explicitly outlines the types of student data collected, the purposes for which it is used, and how it is safeguarded.

### 2. Conduct Security Training

Tallo ensures employees receive regular training on data security and privacy best practices to comply with NY2D.

#### Example:

- Training sessions focus on handling Personally Identifiable Information (PII), recognizing phishing attempts, securing workstations, and adhering to incident response protocols.
- **Assessment Requirement:** All Tallo employees must pass graded assessments with an 80% or better to receive credit for annual training, including but not limited to:
  - Student Data Privacy Training
  - Data Privacy Training
- Training logs and completion records are maintained to demonstrate compliance.



### 3. Require Section NY2D Compliance from Third Parties

At this time, Tallo enforces Section compliance by leveraging OKTA for identity and access management to ensure secure authentication and authorization. This requirement is extended to third-party subcontractors who have access to student data.

#### Example

- **Identity and Access Management:** OKTA is currently used to manage user identities and enforce secure login protocols, ensuring that only authorized personnel can access systems containing student PII.
- **Third-Party Compliance:** At this time, Subcontractors must integrate with OKTA for secure access and must sign data privacy addenda.
- Tallo licensee compliance. Tallo's standard licensee terms mandate the use of Tallo-approved security measures, such as encryption and breach notification protocols, to protect student data.

### 4. Implement Data Security Protections

Tallo employs robust measures to safeguard student data, ensuring compliance with NY2D.

#### Example:

- **Data Encryption:** AES-256 encryption is used for data at rest, and TLS 1.2 or higher is implemented for data in transit to ensure secure data handling.
- **Incident Response Plans:** Regular security audits and penetration testing are conducted to identify and address potential vulnerabilities proactively.
- **Access Limitations:** Role-Based Access Control (RBAC) and multi-factor authentication (MFA) are implemented to restrict access to authorized personnel only.
- **Safeguards for Data Transmission:** AWS Web Application Firewall (WAF) is utilized to protect against web exploits and vulnerabilities during data transmission.

### 5. Monitor Data Systems

Tallo employs robust monitoring practices to detect and respond to potential security threats promptly.

#### Example:

- **Real-Time Monitoring:** Tallo currently uses NewRelic and AWS CloudWatch to monitor system performance and security events in real-time. Alerts are configured to detect and notify teams of suspicious activities.
- **Weekly Scans:** Weekly scans of the application are conducted to identify and remediate malware or vulnerabilities.

### 6. Limit Access to PII

Access to PII is strictly controlled to ensure compliance with NY2D.

#### Example:

- **Role-Based Access Control (RBAC):** Access to sensitive data is limited based on job roles and responsibilities, ensuring only authorized personnel can view or handle PII.
- **OKTA Integration:** OKTA is currently utilized for identity and access management, providing secure authentication and authorization to safeguard PII.

### 7. Destroy PII When No Longer Needed

Tallo follows strict protocols for the secure destruction of PII when it is no longer necessary, in alignment with Stride's data retention policy.

#### Example:

- **Retention and Disposal:** PII is retained only as long as necessary to fulfill its educational purpose or as required by law. Secure deletion methods are used to permanently erase data when it is no longer needed.