Student Information System Security Policy and Procedures

Purpose: The Raíces del Saber Governance Board recognizes the importance of protecting student information and identity at all times to avoid the unlawful and harmful misuse of student data that is important to gather for the purpose of keeping records and analyzing student outcomes so that the most appropriate instruction can be planned and executed to meet each student's individual needs. To this end, the following policy has been developed to protect student identity and personal and academic information.

Policy: The Governance Board of Raíces del Saber Xinachtli Community School directs the Principal of the school to utilize a student information vendor that can adequately collect, warehouse all required student data, and provide said data to the state at all required reporting times, including the state issued student ID number. Additionally, the Student Information System (SIS) shall also collect and store necessary information to support school management of its programs and services, program eligibility and participation, and include such data to inform instructional practice and decision making and to adequately monitor the progress of students through the educational system. In addition, the SIS shall comply, in whole, with New Mexico Administrative Code §6.19.5.8 and assure adequate security measures to protect the student identification number and the data collected on individual students as stipulated by FERPA (Family Educational Rights and Privacy Act).

Procedures:

Execution of this policy will be carried out through the following procedures:

- 1. The School shall issue logins and passwords to employees for access to the system. Passwords will require 8 (eight) characters that shall consist of letter, upper and lower case, numbers and special characters. Access will be hierarchal depending on levels of responsibility within the system. Access will be limited to those portions of the system that are appropriate for the responsibilities of that position. For example; a teacher login will be limited to the instructional management of that teacher's own classes only. Lesson planning, grades, attendance and assignments and results of that teacher, for the students assigned, is all that will visible to that teacher.
- 2. The SIS shall revert to a data neutral page and require the login procedure after 5 minutes of inactivity in the system.
- 3. Determination of who can legitimately access an individual student's records on a "needs to know" basis will be made subsequent to the beginning of each school year.
- 4. The sharing of passwords among employees is strictly prohibited as is the sharing of the unique Student Identification (ID) number that the NM PED issues to each public-school student for use in the accountability data system (ADS).

- 5. The SIS will create an internal log of users that identifies all users, date and time of use, duration of use, and which portions of the system access. This log includes parents and students should those outward facing portals be activated.
- 6. Upon the entering of an exit date for students or termination of employment date for employees the system shall immediately rescind all permissions and levels of access granted previously.
- 7. The Raíces del Saber Xinachtli Community School Governance Board shall regularly review and as appropriate revise its student information system security policy.
- 8. The Raíces del Saber Xinachtli Community School may not use the student identification number on student identification cards or display or utilize the student identification number within any other identification system that is not part of the student identification system.
- 9. The Raíces del Saber Xinachtli Community School Principal shall inform employees to whom access to the student identification system is approved of the requirements of FERPA and the implementing regulations to FERPA. If the Principal has reason to believe that a FERPA violation has occurred by an employee having access to the student identification system, the Principal shall immediately cancel the individual's access authorization in order to protect the student ID system and other confidential data.
- 10. The Principal of Raíces del Saber Xinachtli Community School shall immediately notify the PED's Accountability Data System (ADS) coordinator if the Principal has reason to believe that a breach of security has occurred (or the system has been hacked) with respect to the student identification system. [6.19.5.8 NMAC N, 12-30-04].
- 11. A training will be provided to all teachers at the beginning of each school year on the information above and how to use the system properly.