

LEA Name: MOUNTAIN WEST MONTESSORI ACADEMY

Review Date: 2-Oct-2020 all elements still valid

Evidence #1 and #2: Name and contact info of Data Manager / Information Security Officer

Status: **PASS**

Evidence #3: Annual FERPA Notice

Status: **PASS**

Expected elements

- Parent rights and procedure for following rights
- Definition of school official

[Document](#) meets all requirements.

Evidence #4: Directory Information Notice

Status: **PASS**

Expected elements

- Types of items designated as directory information -
- Process for opting out of directory information -
- Timeline for opting out of directory information -

The [document](#) shared meets all requirements; however, note that there are many elements you are authorized to designate as directory information, which you have not in the notice:

- Date/place of birth
- Dates of attendance
- Weight/height of athletes
- Most recent institution attended
- Student ID numbers

Whereas several of these may not apply due to your student population and though you are not required to designate these as directory information, you may want to consider doing so in order to ensure that your notice reflects actual practice. If, for example, academic honors or awards are given (e.g., honor roll), that is accomplished with the directory information exception. If student IDs are being placed on student ID cards, then this is also being disclosed following the directory information exception. If you are concerned about these data elements being overly exposed, then you may want to consider using a limited directory information policy, as described in [34 CFR §99.37\(d\)](#).

Evidence #5: Data Collection Notice

Status: **PASS**

Expected elements

- Prominent, standalone document, posted on website -
- States student data that are collected -
- States prohibited data collections -
- Includes the exact statement regarding benefits, risk, and choice -
- Describes in general how the LEA protects student data -
- States student rights under the student data protection act –

[Document](#) meets all requirements. Note that the notice no longer needs to include the board of regents disclosure form as this requirement was removed from law.

#### Evidence #6: Data Governance Plan

Status: **PASS**

##### Expected elements

- Incorporate reasonable data industry best practices to maintain and protect data (i.e., adopt a cybersecurity framework) -
- Describe roles and responsibilities -
- Provide for technical assistance, training, support, and auditing -
- Describe the process for sharing student data -
- Describe the expungement process -
- Describe the data breach response process -
- Posted on website

14-Feb-2020: [Document](#) meets all requirements

The expungement policy in the [plan](#) (see 8.1) is based on outdated language in code (i.e., the 23-year-old rule for expungement). This has been updated in code and in board rule, and the retention expungement policy should be changed here.

**Recommendation:** Utilize language in the [most recent template](#) to update the expungement policy. Consider revising language in plan that is USBE-specific.