

**Raised Bill 7017**  
**“An Act Concerning Student Data Privacy.”**

To the chairpersons and members of the Education Committee, my name is Kirsten Creighton, of Thompson, CT, and I submit this testimony as the proud parent of three students currently receiving an education in Connecticut; One in Elementary, one in Middle, and one in Graduate school.

I appreciate the opportunity to offer my voice in support of Raised Bill 7017, “An act concerning Student Data Privacy,” commenting specifically to “Information acquired from a student **through the use of educational software** assigned to the student by a teacher or employee...” and protection of “student records.”

While we wait for much needed regulation on how our schools handle student information, many schools are neglecting to follow important protections **already in place**, (such as FERPA, PPRA and **COPPA\***, the Child Online Privacy Protection Act), when contracting with third party vendors and setting up online accounts for our children. Parents are not being informed about the Privacy Policies of these third party companies, nor are we made aware of the information being shared with them in order to create online user profiles. More often, we are only cognizant of these student accounts AFTER profiles have been created by the school and our children have already put in several hours of online system interaction. In some cases, we are made aware only after some kind of breach has occurred, as has been my personal experience. **\*It is my recommendation that COPPA protection be added under section (1)(b)(8).**

The collection, storage and sharing of data needs to be regulated in a way that puts parents ahead of administrators as the decision makers regarding the collection and protection of their children’s information. Parents should not be on a “last to know” basis with regards to the vendors chosen by the district or the contracts made.

Most schools have “**Internet Use Policies**” but they are largely ONE-WAY, and are focused on the responsibilities of the student, foregoing language about their RIGHTS, and completely dismissing the responsibilities of the districts in safeguarding our children’s academic and personal information and following applicable state and federal laws.

Student online privacy relies on sound security practices by the LEA’s technology departments. One basic example of protecting student information is the creation of strong user names and passwords. We as adults in the workforce rely on important but simple tasks such as updating our passwords regularly, in order to safeguard our files, email, and other private online interactions. Our students are no different. Simple practices such as this are a MUST in the school setting, not only to protect student online accounts from “hackers” on the outside, but from unauthorized access by members of the school community on the inside (including other students.) Privacy and the integrity of academic files are at stake. **Two of my daughter’s online student accounts (including her online digital portfolio used for her SSP) were victim to breach this year due to the use of generic, name-based user names and passwords.**

In closing, I would like to add that while I believe Raised Bill 7017 is a great place to **start** in providing LEA’s with guidelines for contracting with educational vendors for classroom, online and mobile applications, I feel additional legislation is urgently needed to effect similar protections pursuant to contracts made between State and Federal Agency “Contractors” and third party educational vendors and online testing companies. There is currently zero transparency to parents regarding the practices surrounding their children’s student data being collected, stored and shared with respect to the Smarter Balanced online computer adaptive testing and SLDS/P20WIN data base. As a parent and a taxpayer helping to fund this extremely costly “workforce information network” initiative (\$2,000,000 over the next two years?) built to track my child for more than 20 years, **I insist that the P20WIN data distribution system be regulated in law.** Protections should apply throughout the entire PreK-20 data lifespan. Local, state and federal education agencies should be held equally accountable in protecting our children’s personal and academic information.

Thank you again for your time. Kirsten Creighton, Thompson