

Date: April 29, 2020
To: District Administrators
From: Mike Thompson, Deputy State Superintendent
Subject: Considerations for Virtual Ceremonies

Virtual ceremonies are one way to maintain social distancing. When planning these events carefully consider what personally identifiable information (PII) may be inadvertently shared. Districts who will be providing a virtual ceremony should, in consultation with local legal counsel, consider students' data privacy and security.

Provided in this document are some considerations for districts exploring options for creating online graduation ceremonies. This information is provided for general information purposes only, and does not constitute legal advice. Districts should discuss the issues raised in this document with local legal counsel.

Getting started:

- Review the following document from Madison and Dane County Public Health reflecting current health orders [Graduation and COVID-19: How to celebrate the grads safely.](#)
- Review district board policies.
- If there will be contact with students, review the state guidance, and contact local health agencies to ensure the event is within the current COVID-19 public gathering guidelines.
- Inform families what will be shared, when, and how.

Data privacy

- Identify what potential personally identifiable information (PII) will be made public.
- Review district directory data and [public notice](#) considerations.
- If directory data will be disclosed, public notice may not cover virtual events. Consider having families sign a consent form to participate in the virtual ceremony.
- Review the video [records retention guide sheet](#) (FERPA).
- Consider whether students who have opted out from the district's directory data must be removed from the event or work with the family/student to discuss options.

Data security

- If possible, do not make the link to the virtual event public. Distribute the link to the event via email or utilize a service that requires a password to access.
- Takedown public access when the services are complete.

Other considerations

- Review all materials that may be subject to copyright laws (examples include but are not limited to background music, songs, books, poems) [Copyright.gov](#).
- Review federal ADA compliance regulations.