

Wisconsin SLDS Pre-Site Visit: PTAC Documentation Review

Overview:

The National Center for Educational Statistics(NCES) administers the Statewide Longitudinal Data Systems(SLDS) Grant Program and has engaged the Privacy Technical Assistance Center(PTAC) as a resource to aid in document review prior to SLDS grantee site visits.

PTAC, located within the Student Privacy Policy and Assistance Division, was established in 2010 as a “one-stop” resource for education stakeholders to learn about data privacy, confidentiality, and security practices related to student-level data systems and other uses of student data.

SLDS has engaged PTAC to conduct a pre-site visit review of data privacy and security documentation prior to regular site monitoring visits. This review is a culmination of the OIG Inspectors audit of the SLDS Program which identified the area of data privacy and security as an area of focus.

Approach:

PTAC provides regular services to educational entities such as providing official guidance on FERPA through the Student Privacy Help Desk, developing privacy and security training materials for states and districts, issuing privacy and security best practice recommendations including issue briefs and checklists, as well as conducting technical assistance site visits to SEAs and LEAs.

As a basis for this review, PTAC has primarily utilized the “[Checklist: Data Governance](#)” as well as the “[Data Security Checklist](#)”, both developed to assist stakeholder organizations with establishing and maintaining a successful data governance and security program. The final resource used for this review was the “[Written Agreement Checklist](#)”.

Documents Reviewed:

- 4.300 Student Data Access Policy
- 4.315 Confidentiality of Individual Pupil Data and Data Redaction (Policy)
- Acceptable Use Policy
- Confidentiality Training
- Data Access Request Limited Use
- Data Access Request through Footprints
- Data Governance at DPI (presentation)
- Data Governance Intranet Site Screen Shots
- Data Incident Template
- Data Quality Screenshots
- DPI CM Handbook
- DPI Data Contacts Inventory
- DPI Data Steward Committee
- DPI Data Use Agreement
- DPI Internal Data Access Request Process and Role Descriptions

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- DUA UW Teach Ed Taskforce Studies
- DUA WEC ACP Eval
- IT Project Request
- Project Governance @ DPI
- Security and Privacy Review Guidelines-Documentation
- Snapshot Preparation - Detailed Guide
- Student Data Access Policy and Procedures Guidebook

Key Takeaways for Wisconsin:

The Wisconsin Department of Public Instruction (DPI) has done a thorough job identifying key areas within their organization that benefit from having a formal policy to address strategic aspects of data governance.

During the PTAC review, all areas critical to data governance were addressed through documentation provided by DPI. From organizational structure, governance roles and responsibilities, to processes for accessing and requesting data. PTAC was provided with a very complete picture of the data lifecycle in WI as it relates to the SLDS and education data management in the state. Written agreements provided for review, also met requirements and best practices.

Wisconsin has demonstrated one of the most robust and comprehensive data security and management programs that have been reviewed as part of the SLDS Site Visits since the SLDS program has begun to focus on data security and privacy. By ingraining governance throughout the enterprise, Wisconsin has continued to provide a high standard for student data privacy and security.

Key Takeaways for Program Officers and SST;

During review of the documentation provided by Wisconsin, all documentation met the standard of addressing areas PTAC considers best practices, if not establishing a bar for new best practices. PTAC also reviewed written agreements for data sharing.

From a documentation review, WI has demonstrated a well-organized and mature data governance program. Other states would do well to learn from Wisconsin, as an example of addressing data privacy through the implementation and administration of effective data governance.

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Questions for PO and SST to ask during Site Visit;

1. Ask DPI to provide an overview of their data governance program, and how it interacts with the WI SLDS.
2. Were any policies included for review (4.300 Data Access, 4.315 Data Confidentiality and Redaction, Acceptable Use, etc.) in draft form? If so, when will they be approved?
3. Does DPI have a process for reviewing policies, and if so, when will these be reviewed and or updated again?
4. Has DPI experienced any pain points with their current data governance and privacy program, and if so, will those be addressed in updated policies?