

Policy 712: Technology and Data Security**Status:** ADOPTED**Original Adopted Date:** 6/09/2025 | **Last Reviewed Date:** x/x/xx | **Last Revised Date:** x/x/xx

The Highland Community School District recognizes the increasingly vital role technology plays in society. It is the goal of the district to embrace technology as a resource to further educate our students, and better prepare students for the future. It is the intent of the district to support secure data systems in the district, including security for all personally identifiable information (PII) that is stored digitally on district-maintained devices, computers and networks. Technology also has incredible potential to support increased efficiency, communication and growth through collaboration among administration, students, staff, employees and volunteers.

However, with this growth opportunity comes increased potential for valuable sensitive data to become public. The district takes seriously its responsibility to protect private data. The purpose of this policy is to ensure the secure use and handling of all district data, computer systems, devices and technology equipment by district students, employees, and data users.

The district supports the use of third-party vendors to perform necessary education functions for the district. Utilizing third party vendors to outsource functions the district would traditionally perform provides a cost-effective means to deliver high quality educational opportunities to all students. However, it is paramount that third party vendors with access to sensitive data and PII of district students, employees and data users be held to the highest standards of data privacy and security.

The selection of third-party vendors shall be in accordance with appropriate law and policy. Third-party vendors with access to PII shall meet all qualifications to be designated as a School Official under the Family Educational Rights and Privacy Act (FERPA). The board shall ensure that any approved contract with a third-party vendor will require that the vendor comply with all applicable state and federal laws, rules, or regulations, regarding the privacy of PII.

It is the responsibility of the superintendent to develop procedures for the district to enhance the security of data and the learning environment. The procedures shall address, but not be limited to, the following topics:

Access Control –Access control governs who may access what information within the district and the way users may access the information. Increased access to secure networks and data will inevitably increase the risk of security compromise to those networks and data. It is the responsibility of the superintendent to develop procedures for determining which individuals will have access to district networks, devices and data; and to what extent such access will be granted. System and network access will be granted based upon a need-to-have requirement, with the least amount of access to data and programs by the user as possible.

Security Management –Security management addresses protections and security measures used to protect digital data. These include measures related to audits and remediation, as well as security plans for responding to, reporting and remediating security incidents. It is the responsibility of the superintendent to develop procedures to govern the secure creation, storage and transmission of any sensitive data and personally identifiable information (PII). The superintendent or designee shall implement network perimeter controls to regulate data moving between trusted internal resources to external entities.

Technology and Data Use Training –Technology and data use training addresses acceptable use best practices to safeguard data for students, employees and staff. It is the responsibility of the superintendent to develop procedures for creating and administering a training program on proper data and technology use. The training shall address the proper use and security of all district owned or controlled technology, devices, media and data. Training should be administered to all district data users. The training program should be updated and presented to the school board for approval on an annual basis.

In furtherance of this policy, the superintendent or designee shall be responsible for overseeing district-wide data and technology security, to include development of standards and procedures and adherence to the administrative procedures defined in this document.

Note: *This policy and accompanying regulation are not mandatory for districts. This policy is intended as guidance for districts. Data and technology security are very broad topic areas, and the purpose of this policy is to attempt to break down this subject into more manageable topics for districts. In deciding how and when to implement data safeguards, districts should balance the already existing need to safeguard data with the resources they have available.*

Legal Reference: 20 U.S.C. §1232g; 34 C.F.R. Part 99
47 U.S.C. §254
20 U.S.C. §6777
Iowa Code §§ 715C

I.C. Iowa Code

Iowa Code § 715C

Description

[Personal Information Security - Breach](#)

U.S.C. - United States Code

20 U.S.C. § 1232g

Description

[Education - FERPA](#)

47 U.S.C. §254

[Telecommunications - Common Carriers](#)

Cross References**Code**

506.01

Description

[Education Records Access](#)

506.01-R(1)

[Education Records Access - Regulation](#)

506.01-E(1)

[Education Records Access - Request of Nonparent for Examination or Copies of Education Records](#)

506.01-E(2)

[Education Records Access - Authorization for Release of Education Records](#)

506.01-E(3)

[Education Records Access - Request for Hearing on Correction of Education Records](#)

506.01-E(4)	<u>Education Records Access - Request for Examination of Education Records</u>
506.01-E(5)	<u>Education Records Access - Notification of Transfer of Education Records</u>
506.01-E(6)	<u>Education Records Access - Letter to Parent Regarding Receipt of a Subpoena</u>
506.01-E(7)	<u>Education Records Access - Juvenile Justice Agency Information Sharing Agreement</u>
506.01-E(8)	<u>Education Records Access - Annual Notice</u>
605.04	<u>Technology and Instructional Materials</u>
713	<u>Responsible Technology Use & Social Networking</u>
713-R(1)	<u>Responsible Technology Use & Social Networking - Regulation</u>