



STUDENT DATA  
ACCESS AND USE GUIDELINES  
CATOOSA COUNTY PUBLIC SCHOOLS

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# **Catoosa County School District Student Data Access and Use Guidelines**

## **Introduction**

Data on student status and performance linked to a unique numerical identifier is collected by Catoosa County Public Schools (CCPS) for the purposes of satisfying federal and state mandates and reporting requirements and improving education for all students in the District. This collection of data is facilitated by the Catoosa County Student Information Management System (Infinite Campus).

The confidentiality of this data must be protected. Therefore, CCPS will not release or disclose personally identifiable student level data regarding students in the public schools of Georgia unless permitted by law.

The purpose of these guidelines is to prescribe how data will be collected, maintained and disseminated in compliance with applicable federal and state laws. These guidelines apply to all organizational units, their agents and staff within CCPS, their authorized agents and any contractors, subcontractors and their agents.

CCPS personnel with specific questions regarding the release of student information can direct those inquiries to the Office of Technology and Information Services. Any other individual with any questions regarding student information or these guidelines should contact the CCPS Division of Technology or the Division of School Improvement.

## **Background Information**

These guidelines pertain to individual student data collected and maintained by CCPS. Individual student data are used for state and federal reporting, including the federal Every Student Succeeds Act, state assessments, state aid, special education and program participation, as well as to satisfy other data requests from CCPS, the state legislature and other authorized entities.

Individual student data are managed by CCPS in accordance with state and federal laws. The Family Educational Rights and Privacy Act of 1974 (FERPA), 20 U.S.C. §1232g, and its implementing regulations found at 34 CFR Part 99, the Individuals with Disabilities Education Act (IDEA), 20 U.S.C. §1417(c), 1439(a)(2), and its implementing regulations found at 34 CFR § 300.123 and §300.622, and Georgia statutes, regulations and policies govern the confidentiality of, and access to, students' educational records. These guidelines contain information about the procedures that will be used to ensure the confidentiality of student information and data maintained by CCPS. These guidelines do not expand or in any way change the allowable uses by staff of these data or the availability of student data to any other educator or member of the public.

The student data collected in Infinite Campus is intended to support better decision-making and policies for improving the performance of students and schools. CCPS intends that Infinite Campus will ultimately reduce the reporting burden, help to facilitate the entry of students into a new local education agency (LEA) and ensure that timely, high quality data are available to authorized users.

Data is collected on all Georgia students in public schools, as well as students in participating private or nonpublic school entities. The data are collected periodically in a prescribed format and reflect what is needed for reporting and educational decision-making. Student data are consistent with best practice definitions as identified by state and national standards groups, such as the National Center for Education Statistics (NCES).

The Technology Director or his/her designee has the authority to establish a system that maintains data in accordance with FERPA and other relevant state and federal laws and regulations.

### **Definitions Related to these Guidelines**

Georgia adheres to the confidentiality requirements of both federal and state laws, including, but not limited to, FERPA, IDEA, the Protection of Pupil Rights Amendment (PPRA), the National School Lunch Act, and Article 15 of the Georgia Code Student Data Privacy, Accessibility and Transparency. The following definitions are derived from these laws and other related documents that are relevant to the implementation of these guidelines.

“Access” means including but not limited to, editing, printing, downloading, copying or retrieving data from a computer, computer system, computer network or other medium.

Confidential data includes personally identifiable information about a student that is prohibited from disclosure pursuant to state or federal law or information that is intended for the use of a particular person/group and whose unauthorized disclosure could be prejudicial to the individual it identifies. Information which allows for the identification of an individual student and that is collected by CCPS is considered personally identifiable information and may not be released without parental consent, except in very limited circumstances set forth in 34 C.F.R. §99.31. “Directory Information” can be released, and includes but not limited to:

- Family information such as names, address, phone numbers not designated as “private”, participation in programs, birth year, height, weight and photo.

Confidential information may be released to qualified recipients such as Federal, State and Local governmental post-graduate entities.

Confidentiality refers to CCPS's obligation not to disclose or transmit personally identifiable information about individual students to unauthorized parties. Confidentiality consists of the measures used to protect how personally identifiable information is collected and maintained and when consent by the student or his or her parent/guardian is required to release information.

Disclosure means permitting access to, revealing, releasing, transferring, or otherwise communicating personally identifiable information contained in education records to any party, by any means, including oral, written, or electronic.

Personally identifiable student level data and/or information includes, but is not limited to: the student's name; the name of the student's parent/guardian; the address of the student or student's family; personal identifiers, personal characteristics or other information that would make the student's identity easily traceable.

### **Guiding Principles**

The following principles have been used in establishing these guidelines:  
Student information is a valuable asset and should be treated as such;

- CCPS manages student information under its control throughout its life cycle, from original submission to appropriate destruction;
- CCPS is responsible for managing appropriate access to and use of student information;
- Central Office Administrators and School Administrators are responsible for authorizing personnel to access to student information at the LEA level;
- CCPS is responsible for reviewing and updating policies and regulations covering confidential student information and ensuring that its activities comply with state and federal law;
- CCPS will make its student data access and use guidelines available to the public.

### **Measures Used to Protect Confidentiality**

To ensure the maintenance of confidentiality of student data, these guidelines include four privacy and confidentiality protections. These include assignment of a unique identifier, data security, restricted access and statistical security.

#### ***Assignment of a Unique Identifier (GTID)***

The GTID is a State-assigned ten-digit number that is generated for each student, is unique to that student and will protect the confidentiality of the individual student record of each student. The GTID database contains a selected set of data about individual students that will allow for the assignment of a unique student identifier. The GTID is randomly generated and contains no embedded meaning. Once the number is created, it is first checked for duplicates. If any duplicates are found, they will be reconciled using a set of information, such as the first name, last name, date of birth, gender, race/ethnicity, and the LEA identification number of the student. After being checked for duplicates, the number is made permanent.

There are numerous benefits which result from the assignment of a GTID. For example, upon receiving a student who has transferred into his/her LEA from another LEA within

Georgia, an LEA administrator must locate the student's unique student identifier and access personally identifiable information regarding the student. The goal of this system is to maintain a unique identifier for every Georgia student such that:

- only one student is ever assigned a particular number;
- once a student is assigned a number, that number is always associated with that student throughout his or her educational career or until he or she leaves the state; and
- a student is only assigned one number so that the student is not duplicated when reporting to CCPS.

CCPS also assigns every student a local CCPS unique identifier from Infinite Campus called the Student ID. The Student ID is used for daily student data management. The cross-reference of the Student ID and GTID is validated and secured by the Office of Information Services under the Technology Department.

### ***Data Security***

Security includes the technical measures put into place by CCPS to ensure that records are not lost, stolen, vandalized, illegally accessed, or otherwise rendered useless. Since the data are stored on computers, there will be a high level of protection that provides integrity and availability commensurate with the level of risk and magnitude of harm. Procedures that will be used include secure firewalls, secure socket layers, audit trails and physical security, such as restricted data center access.

### ***Restricted Access to Student Level Data***

#### ***LEA and School Personnel***

The central office director or program coordinator along with the chief school administrator of an LEA or their designee is responsible for authorizing access to data concerning students enrolled in that LEA. An individual will be granted access to specific data through job assignment or signing either a Student Data Non-Disclosure Agreement and/or receiving approval of the administration for carrying out duties and assignments as directed by CCPS and/or school administration. Staff not assigned additional duties or responsibilities will have specific information access for students enrolled within their classes.

#### ***LEA access to GTID***

GTID allows trained and authorized LEA personnel to upload a batch file of their students, download a batch file of students previously submitted from their LEA, create a GTID on-line, or use the search functionality to locate individual students. LEAs will only be allowed to view or download their own batch files. LEA staff may only use the search functionality for the purpose of locating students already assigned a GTID.

### ***CCPS Staff Access***

Approved CCPS staff will have access to student level data contained within Infinite Campus on an individual basis following assignment of job duties or responsibilities or additional administrative approval. Authorized Database Administrators will have access to the entire database, but only for purposes of mandated state reporting, troubleshooting and correcting errors or avoiding potential errors. Any CCPS employee or authorized agent assigned responsibilities that require student level data access must either sign a Student Data Non-Disclosure Agreement or receive permission from administration either at the Central Office level or Building level. Examples of staff requiring access are those who work directly with LEAs in implementing and supporting student longitudinal data systems and the technical staff required to support those systems. Additionally building staff who work with students within expanded instructional capacities have data view rights sufficient to complete their instructional assignments. The specific level of access to student data depends upon the staff member's responsibilities.

### ***Other Access***

Individuals, other than those listed above, will not have access to student level data, except under the circumstances listed below.

### **Access Exceptions**

Under these guidelines, no personally identifiable student information will be released without the consent of the parent or eligible student except under the following circumstances as permitted by FERPA, as set forth in 34 C.F.R. §99.31:

- To teachers and officials of the LEA in which the student is currently enrolled who have a legitimate educational interest in the information, under Section 99.31(a)(1), with the approval of the chief school administrator or designee.
- To LEA and school personnel where a student seeks or intends to enroll, under Section 99.31(a)(2).
- To comply with a lawfully issued subpoena or court order, under Section 99.31(a)(9)(i), following notification requirements set forth in Section 99.31(a)(9)(ii).
- To educational officials in connection with an audit or evaluation of a federal or state supported education program, under Section 99.32(c)(3), subject to the requirements of Section 99.35.
- To appropriate parties in connection with a health or safety emergency, if such knowledge is necessary to protect the health and safety of the student or other individuals under Section 99.36(a).

### ***Electronic Record of Access Requests***

The Technology Department and Information Services maintains a framework of Central Office and Building Level job roles and responsibilities. Additionally records of requests for access to personally identifiable information from administration from outside the school system are kept by the department receiving the request. A record need not be maintained if the request was from, or the disclosure was to:

- The parent or eligible student;
- A school official or employee of the LEA in which the student is currently enrolled with a demonstrated legitimate educational interest;
- A party with written consent from the parent or eligible student; or
- A party seeking or receiving the records as directed by a Federal grand jury or other law enforcement subpoena and the issuing court or other issuing agency has ordered that the existence or the contents of the subpoena or the information furnished in response to the subpoena not be disclosed.

### ***Disclosures***

Any release of personally identifiable information is subject to the following conditions;

- the party to whom the data are released does not disclose the information to any third party without the prior written consent of parent or eligible student;
- the data will be used only for the purpose for which the disclosure was made

### ***Statistical Security***

CCPS will use the student data to produce aggregate reports from individual data that relate to groups of students. The student data will also be linked to other CCPS databases to produce additional aggregate reports. While it may seem that the use of anonymous aggregated data poses little threat to confidentiality, there are some cases where specific populations may include only a few individuals.

### **Data Use and Release**

#### ***State and Federal Reporting***

A key purpose of maintaining student level data is to provide access to statistical information that improves the education-related decisions of teachers, administrators, policymakers, parents and other education stakeholders.

Confidential data on an individual student will not be disseminated in violation of federal or state law. Furthermore, it should not be used for any purpose other than those stated in these guidelines. If CCPS enters into a contract with a private individual or third party to perform any of the data reporting or statistical analysis, that agreement should require that the data be protected in the same manner.

CCPS will aggregate the individual student data to comply with required state and federal reporting.

### ***Parents Rights***

Upon request, and as specified under Section 99.10(a)(2) of the FERPA regulations, the Technology Department and Information Services will provide access to a student's education data to a parent, legal guardian or the student if that student is over the age of eighteen. Such access should be provided within 45 days of a request. If the education data contains information on more than one student, the parent or eligible student may inspect and review or be informed of only the specific information about that student.

### ***Agency Data Sharing***

CCPS has inter-agency agreements to share limited amounts of data for the benefit of the children of Georgia, as allowed by law. All sharing of student data should comply with the requirements of FERPA. CCPS will comply with requests for individual student data from federal and state governmental agencies as required by law.

### **Researchers**

Aggregate Information- CCPS will respond to requests for aggregate student data by researchers. Aggregate data does not include any student specific information, including, but not limited to, name and student identifier. CCPS will work with researchers with the goal that they receive the most meaningful data possible without the disclosure of information that would make any student's identity easily traceable. All requests must follow the CCPS process for requesting research data.

Personally Identifiable Information- CCPS receives requests for personally identifiable information about students from researchers in many contexts. Since CCPS acquires personally identifiable information from LEAs pursuant to Section 99.31(a)(3) of the FERPA regulations, CCPS may not re-disclose personally identifiable information to a third-party researcher unless the researcher is acting as an "authorized representative" of the schools system acting under the direct control of the school system as an employee, appointed official or contractor who is providing services that the school system would otherwise provide for itself.

Likewise, Section 99.31(a)(6) permits information about individual students to be released without parental permission to researchers conducting studies for or on behalf of CCPS to develop, validate or administer predictive tests; administering student aid programs or to improve instruction. In order to permit a release of personally identifiable information under Section 99.31(a)(6), CCPS must have authorized the study, and it must be conducted for or on behalf of CCPS. The fact that an outside entity, on its own initiative, conducts a study which may benefit an educational agency or institution does not transform the study into one done "for or on behalf of" CCPS.

Beyond these limited circumstances, personally identifiable information about a student may not be provided in response to research requests. Researchers must submit a written request for any data to the Division of School Improvement. The request must explain the purpose of the research study, the facts that demonstrate that CCPS authorized the study or that the study is being conducted on behalf of CCPS, and how the researchers will ensure data confidentiality and security. This includes how the data will be stored, used, maintained, disseminated and destroyed. Requests will be considered on a case-by-case basis to determine if they are in compliance with state and federal laws and regulations. Any release of student data to researchers outside CCPS is considered a loan of data, i.e., the recipients do not have ownership of the data. Researchers will be required to supply a copy of any analysis or reports created with the data and to destroy the data once the research is completed.

CCPS reserves the right to charge a reasonable fee for the use of data by researchers to help offset the district's costs of generating and providing the data.

### **Improper Disclosure of Student Records**

The Division of School Improvement along with the Technology Department and Information Systems has the responsibility for determining whether a request for access to student records constitutes a legitimate request for an appropriate usage of student data. If the request does not meet standards established by CCPS for the lawful release of student data, then the Division of School Improvement will deny the request.

The Technology Department is responsible for determining if personally identifiable or confidential information has been inappropriately disclosed by a CCPS employee or authorized agent in violation of these guidelines. Such disclosure, which may constitute a violation of federal law, may be subject to disciplinary action. If an improper disclosure is made by someone other than a CCPS employee or authorized agent, then the involved parties may be subject to an investigation or other disciplinary actions.

### **Ownership of the Data**

LEAs or other primary sources of the data that are located at CCPS are the originators and owners of those data. The Technology Department and Information Services functions as the custodian of the data for CCPS. In order to protect the data in its custody, CCPS has established these guidelines that are implemented by the Technology Director, Information Services Coordinator and the Office of School Improvement and with the support and backing of the Superintendent of Schools.

The guidelines are enacted to safeguard all personally identifiable or confidential information. Requests for access to data are made through the Division of School Improvement, Technology and Information Services or Communications.

# Appendix I:

## Student Data Non-Disclosure Agreement

Individual student information maintained in the Georgia Department of Education's State Longitudinal Data System and in the Catoosa County Student Information Management System is collected for the purpose of meeting local, state and federal reporting requirements. The data are protected by state and federal laws and is to be maintained in a confidential manner at all times.

As an individual authorized to access student data, you are required to maintain this information in a confidential manner. Any unauthorized access to, modification, deletion, or disclosure of these data is a violation of this agreement and potentially a violation of state and federal laws governing the confidentiality of education data, and it could constitute a punishable act.

Unauthorized reproduction/copying, and/or distribution of any student record or information outside the intended and approved use are strictly prohibited. Users violating this agreement may be subject to an investigation or other disciplinary actions.

I certify that I have reviewed CCPS's Student Data Access and Use Guidelines. I hereby acknowledge and agree to comply with the guidelines and the above requirements.

I agree

I do not agree

Signature

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Date

Printed Name:

Position:

School Name:

**Catoosa County Schools**

**APPLICATION FOR RESEARCH STUDY**

**REQUESTING PERSON (S)**

Contact Name Title / Agency

Address Day Phone Fax Number

City / State Zip Code

Email Address

College/Institution or Organization Sponsoring Project

**DESCRIPTION OF STUDY**

Title of Research Proposal

Synopsis of Research purpose, procedures and anticipated results:

Beginning Date: Completion Date

**INFORMATION REQUIRED**

**Please provide (1) copy of your research proposal.**

**Please provide an attachment to answer the following questions:**

1. How much school time will be involved for staff research?
2. What schools will be involved?
3. Number of students needed and particular characteristics (boy, girl, age, etc.)
4. Information needed for individual students.
5. What are space / room requirements?
6. Will school supplies / equipment be required?

7. Will financial support be requested from the Catoosa County Board of Education?
8. How will teachers be required to help in the study (function and time)?
9. How will other school personnel be involved in the study (function and time)?
10. What data will be collected? (Specify names of commercially available tests and attach copies of research-developed instruments.)
11. What methods of data analysis will be used?
12. How will parental consent be obtained (if appropriate)?
13. How will human subjects be protected in view of the Family Rights and Privacy Act?
14. How will this study benefit Catoosa County Schools?

**COMMUNICATION REQUIREMENTS**

**It is a requirement of this system that school administrators/department administrators (of the schools or departments involved, if any) give approval for the involvement of time and effort for each research study. Documentation of the approval is shown below (copy and past to add more signature lines if additional administrators' approvals are needed):**

**School Principal(s)/Director(s):**

**I have received a thorough explanation of the research project and understand the required involvement of my staff, students, parents, and/or data. I take full responsibility for overseeing that all levels of confidentiality are maintained and legal restrictions are followed.**

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**Principal's Name (printed) Principal's Signature**  
**Date \_\_\_\_\_**

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**Principal's Name (printed) Principal's Signature**  
**Date \_\_\_\_\_**

**RESULTS**

Do you agree to provide a copy / summary of the completed study to the Catoosa County Board of Education?

Signature Date

**Please return a form and a copy of your proposal to:**

Catoosa County Board of Education Dr. Kim Nichols Assistant  
Superintendent Catoosa County Schools P.O. Box 130  
Ringgold, GA 30736

All correspondence send to: Tori Washburn, Executive Assistant to Assistant Superintendent  
(twashburn@catoosa.k12.ga.us)

⊖ Approval Granted (Date): \_\_\_\_\_

Reviewer's Signature: \_\_\_\_\_

⊖ Approval Denied (Date): \_\_\_\_\_

Reviewer's Signature: \_\_\_\_\_

Appendix 3 Standard Letter of Approval

Date

Mrs./Mr. \_\_\_\_\_

Dear Mrs./Mr. \_\_\_\_\_:

Based on my review of your research proposal, the system grants you permission to conduct the study entitled “\_\_\_\_\_” within the Catoosa County Public Schools organization, specifically \_\_\_\_\_ School. This permission is granted on the basis that the school principal will establish procedures to ensure that the privacy of students and staff is maintained. As Georgia educators, we are also all required to follow the standards established in the Georgia Professional Standards Commission Code of Ethics. We reserve the right to withdraw from the study at any time if our circumstances change.

I understand that the data collected will remain entirely confidential and may not be provided to anyone outside of the research team without permission from the \_\_\_\_\_ University Institutional Review Board (IRB).

Sincerely,

Dr. Kim Nichols Assistant  
Superintendent Catoosa County  
Public Schools

Cc: \_\_\_\_\_, Principal of \_\_\_\_\_ School

## Appendix 4 Roles and Responsibilities

### Infinite Campus Assignment of Rights Procedures

1. Program Directors and Coordinators will provide the guidance to technology and student information systems regarding the rights of personnel within the schools for Infinite Campus. The positions include: Academic Coaches, Gifted, Special Education, (list additional). See Directors and Coordinators for specific roles.
2. School Based Roles: The principal and assistant principal will provide guidance to technology and student information systems regarding the rights of personnel within the schools for Infinite Campus. The positions include but are not limited to:
  - a. ISS Teacher
  - b. Media Center
  - c. Student Support Team Members
  - d. 504 Coordinator
  - e. PBIS Coordinator/Team Members
  - f. Yearbook (Secondary Level)
  - g. Early Intervention Staff
  - h. Elementary Computer Lab Teachers
  - i. National Honor Society Lead Staff
3. Schedule Based Roles: All staff that do not fall within the school based roles will have defined schedules for student information view/access within Infinite Campus. The school administrative team may request additional rights for a specialized role within their building that falls outside of the school based roles.

## Appendix 5 Roles and Responsibilities Continued

### Central Office Directors and Coordinators

Assistant Superintendent or Designee:  
Academic Coaches

High School Curriculum Coordinator  
Gifted Personnel

Elementary Curriculum Coordinator  
EIP Personnel

Middle School Curriculum Coordinator  
ESOL Personnel

Special Education Director  
Central Office Special Education Staff  
School Level Central Office Staff

Director of Student Services  
Central Office Enrollment Personnel  
PBIS School Level Coaches  
Athletic Directors (Middle School and High School)

Director of Finance  
School Level Bookkeepers

Director of Operations  
School Level Safety Team Coordinators  
County Office Level School Nutrition Personnel  
School Level Nutrition Personnel

Director of Transportation  
Central Office Level Transportation Personnel

Director of Technology  
Central Office Information Systems  
Central Office Database  
School Level Technicians

