

California AB 1584 Compliance Checklist

BLPS Content Connections, LLC certifies that it complies with all of the required provisions listed in California Assembly Bill No. 1584, Education Code, Section 49073.1. This new law took effect on January 1, 2015. BLPS Content Connections, LLC contracts initiated after January 1, 2015 will include compliance with all of the provisions listed in AB 1584 within the contract.

California AB 1584 requirements:

1. **A statement that pupil records continue to be the property of and under the control of the school district or local education agency.**
 - BLPS Content Connections, LLC complies with this requirement. BLPS ensures that pupil records are the property of and under the control of the local education agency (LEA). BLPS receives only the minimal student data that are necessary for meaningful implementation of the data and analytics in the learning management system.
2. **A description of the means by which pupils may retain possession and control of their own pupil-generated content, if applicable, including options by which a pupil may transfer pupil-generated content to a personal account.**
 - BLPS Content Connections, LLC complies with this requirement. Through the assistance of BLPS tech support, students have the ability to download, export or otherwise save data or documents they create. Requests shall be made to G2Atechsupport@blpscontentconnections.com. Said requests shall be verified as valid through a multi-step confirmation process prior to release of data and/or documents. Independent pupil downloads/exports are not authorized as a preventative security measure for unauthorized access to the pupil's intellectual property and/or data.
3. **A prohibition against the third party using any information in the pupil record for any purpose other than those required or specifically permitted by the contract.**
 - BLPS Content Connections, LLC complies with this requirement. BLPS issues a yearly notification to employees and vendors alike, wherein is described the prohibition against using any information in the pupil record for any purposes other than those required or specifically permitted by the contract. All individuals are required to sign this letter thus signifying their understanding of the prohibition and certifying their compliance with this prohibition. Additionally, BLPS maintains and updates on a yearly basis its corporate Information Security Policy which describes handling of confidential information.
4. **A description of the procedures by which a parent, legal guardian, or eligible pupil may review personally identifiable information in the pupil's records and correct erroneous information.**
 - BLPS Content Connections, LLC complies with this requirement. Minimal personally identifiable pupil information is stored in the learning management system and is obtained from the LEA through Standards Plus. If a parent, legal guardian, or eligible pupil discovers erroneous information, they shall submit a correction request to BLPS tech support via YouTrack (or similar software) support ticket. Said request shall be forwarded to the LEA via Standards Plus for review and correction. Upon notice from the LEA that the correction is valid, BLPS will update the pupil's record in the learning management system. Independent parent, legal guardian and/or pupil correction of information directly in the learning management system is not authorized as a

preventative measure to ensure that there is no mismatch of information between the LEA records and the learning management system.

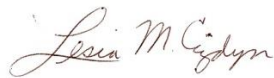
5. **A description of the actions the third party will take—including the designation and training of responsible individuals—to ensure the security and confidentiality of pupil records.**
 - BLPS Content Connections, LLC complies with this requirement. BLPS maintains and updates on a yearly basis its corporate Information Security Policy which describes Information Security Responsibilities and Roles (Systems Administrator, Information Custodian, User Management and User), as well as Information Classifications (Confidential Information, Internal Information, Public Information) and training protocols. Additionally, the corporate Information Security Policy contains detailed Computer and Information Control protocols to protect all systems and information from misuse, unauthorized manipulation and destruction. Also, included in the corporate Information Security Policy are separate, strict Password Control Standards.
6. **A description of the procedures for notifying the affected parent, legal guardian or eligible pupil in the event of an unauthorized disclosure of the pupil's record.**
 - BLPS Content Connections, LLC complies with this requirement. In the event of an unauthorized disclosure of the pupil's record, BLPS will notify Standards Plus of the breach, the circumstances of said breach and remedial actions to be taken by all parties concerned.
7. **A certification that a pupil's record shall not be retained or available to the third party upon completion of the terms of the contract and a description of how that certification will be enforced. (NOTE: This requirement does not apply to pupil-generated content if the pupil chooses to establish or maintain an account with the third party for the purpose of storing that content, either by retaining possession and control of their own pupil-generated content, or by transferring pupil-generated content to a personal account.)**
 - BLPS Content Connections, LLC complies with this requirement. Approximately forty-five (45) days before the completion of the contract, the LEA will receive a notice with options from which to choose:
 - Option 1: Pupil records and content will continue to be accessible to the LEA for a specified period after contract completion at an extra charge. If the LEA chooses this option, pupil records will be destroyed per the process below after the specified period for this option concludes.
 - Option 2: Pupil records and content will be exported and provided to the LEA at time of contract completion, and records will be destroyed per the process below.
 - If LEA does not choose either option above, the records will be destroyed per the process below.
 - Within thirty (30) days after completion of the contract, BLPS will permanently delete all content, data, media files, records from the learning management system. BLPS will then provide a "Certificate of Deletion/Destruction" noting the date and time of content deletion/destruction, as well as the name(s) of the company individual(s) who carried out these duties and management measures to oversee said deletion/destruction.
 - Under no circumstances will pupils be able to establish or maintain an account with BLPS for continue storage of the pupil-generated content within the learning management system. Pupils will receive a notice with instructions for downloading, exporting or otherwise saving data or

documents they create (see bullet 2 above). Upon successful completion of the validation process, pupil-generated data/content will be provided to the individual owners of said material.

8. **A description of how the district and the third party will jointly ensure compliance with the federal Family Educational Rights and Privacy Act.**
 - BLPS Content Connections, LLC complies with this requirement. All BLPS policies and procedures, including the technological implementation of the learning management system, serve to comply with FERPA regulations. Additionally, BLPS will routinely review PTAC Training Topics / Technical Assistance Services to ensure that the learning management system remains compliant.
9. **A prohibition against the third party using personally identifiable information in pupil records to engage in targeted advertising.**
 - BLPS Content Connections, LLC complies with this requirement. It is BLPS policy to maintain confidentiality of personally identifiable information in pupil records. It is absolutely prohibited for anyone with BLPS to sell, trade, rent, utilize for company and/or personal benefit, or otherwise make public the confidential information with which we are entrusted. Only the few BLPS employees and vendor staff members who have an absolute need to work with said confidential information are given access. This list of individuals with access is documented and updated, as needed. All individuals with access sign a specific non-disclosure agreement regarding the confidentiality of the information, as well as a document acknowledging the prohibition discussed herein.

IN WITNESS WHEREOF, the party hereto certifies compliance with California AB 1584.

BLPS Content Connections, LLC



Authorized Signature

Lesia M. Cizdyn, Chief Operating Officer

PRINTED NAME & TITLE

27 July 2017

Date