LEA Report

LEA: Cleveland Preparatory Academy [OH] year-2

lealD: 3901496, st_lealD: OH-013199, state: OH, schools: 1, type: Independent charter district

Primary Contact: Robert Williams, info@clevelandprepacademy.org

Secondary Contact: Myisha Godfrey, mgodfrey@clevelandprepacademy.org

comments:

	Annual Notice Best Practice: ED's model notification of rights under FERPA is available at https://studentprivacy.ed.gov/resources/ferpa-model-notification-rights-elementary-secondary-schools	Comments TOP
Yes	Does the LEA post its annual notice on the website?	
Yes	Is the annual notice the ED Model?	
No	Is the annual notice custom?	
	Annual Notice - Additional Information and Best Practices Best Practice: Post electronic copies of your required FERPA and PPRA notices on your website as a reference for parents and students to consult later. Clearly label the data practices/student privacy section and ensure that users can quickly navigate to it from the homepage with just one or two mouse clicks. https://studentprivacy.ed.gov/resources/transparencybest-practices	Comments
Yes	Does the LEA notify that it routinely discloses students' education records to other schools in which the student seeks or intends to enroll?	
No	Does the annual notice appear as primary website content (e.g. the content is visible on the LEA main website or available from a dropdown menu without going to a PDF or a separate	

	external website)?	
Yes	Is the annual notice (ED template or custom notice as indicated above) found within the student handbook?	
No	Is the annual notice found within or as part of another document? (Note in comments.)	
Yes	Is there an indication of when the annual notice was last updated?	Notice is in the 2019-20 handbook. An adoption date for the specific policy isn't available.
	Directory Information Best Practice: ED's Model Notice for Directory Information is available at: https://studentprivacy.ed.gov/resources/model-notice-directory-information	Comments TOP
Yes	Does the LEA post its directory information policy on the website?	
No	Is the LEA directory information policy the ED Model?	
Yes	Is the LEA directory information policy custom?	
Yes	Does the custom policy include the types of PII that the district or school has designated as directory information?	
Yes	Does the custom policy include an explanation of the right of parents and eligible students to request that the information about the student not be disclosed as directory information?	
Yes	Does the custom policy include a specified period of time within which a parent or eligible student may notify the school or LEA in writing that they do not want any or all of the information disclosed as directory information?	
	Directory Information - Additional Information	

	and Best Practices Best Practice: Describe your school's or district's policies governing access and use of students' PII. When possible, consolidate information about data practices and privacy protections into a single page or section on your website. https://studentprivacy.ed.gov/resources/transparency-best-practices	Comments TOP
No	Is the LEA DI policy a Limited DI policy (Limited DI includes the limited parties or purposes for which directory information may be disclosed)	
No	Does the LEA DI include Student ID?	
No	Does the LEA DI policy include photo/video likenesses?	
No	Does the LEA DI policy have a separate video/photo consent policy (e.g., for social media, newspaper, etc.)?	
No	Does the LEA DI policy appear as primary website content (e.g. the content is visible on the LEA main website, or from a drop down menu without going to a PDF or a separate external website)?	
Yes	Is the LEA DI policy found within the student handbook?	
No	Is the LEA DI policy within or as part of another document? (Note in comments.)	
No	Does the DI notice include disclosure to military recruiters?	Not applicable
No	Is there a separate notice for disclosure to military recruiters?	Not applicable

No	Does the LEA provide a "menu" approach allowing parents to opt in/out of specific disclosures? (Note details in comments.)	
Yes	Is there an indication when the LEA DI policy was last updated?	Notice is in the 2019-20 handbook. An adoption date for the specific policy isn't available.
	PPRA Best Practice: Post electronic copies of your required FERPA and PPRA notices on your website as a reference for parents and students to consult later. https://studentprivacy.ed.gov/resources/transparency- best-practices	Comments OTOP
Yes	Does the LEA post its PPRA policy on its website?	
No	Does the LEA PPRA policy appear as primary content on the LEA website? (e.g. the content is visible on the LEA main website, or from a dropdown menu without going to a PDF or a separate external website)	
Yes	Is the LEA PPRA policy included within the student handbook?	
No	Is the LEA PPRA policy within, or as part of another document? (Note in comments.)	
No	Is the PPRA notice custom?	
Yes	Is the LEA PPRA notice the ED model/minor variant?	
Yes	Does the LEA PPRA policy indicate it is provided to parents at least annually?	
Yes	Is there an indication when the LEA PPRA policy was last updated?	Notice is in the 2019-20 handbook. An adoption date for the specific policy isn't available.
	Data inventory listing information collected by the	

	LEA from or about its students Best Practice: Develop and publish a data inventory listing the information that you collect from or about your students. A best practice is to provide this information at the data element level. https://studentprivacy.ed.gov/resources/transparency- best-practices	Comments TOP
No	Does the LEA website have a data inventory listing information collected by the LEA from or about its students?	
	Data Security Best Practice: Explain your institution's information technology (IT) security and data protection policies (both for paper records and for digital information). https://studentprivacy.ed.gov/resources/transparencybest-practices	Comments TOP
No	Does the LEA website have a description of IT security and data protection policies?	
No	Does the LEA website have a description of policy or procedures specifically access to student PII?	
No	Does the LEA website have a description of policy or procedures specifically use of student PII?	
No	Does the LEA website describe how student records are retained (identifiable, minimized/redacted, deidentified)?	
No	Does the LEA website have policies describing how the LEA de-identified student PII before published or disclosed to third parties?	
	Data Sharing Best Practice: Parents care about who has access to and uses their children's information. Let them know the reasons you are sharing data with a third party and	

	explain the legal, contractual, and policy protections in place to safeguard the data. https://studentprivacy.ed.gov/resources/transparency-best-practices	Comments TOP
No	Does the LEA website have a description of any data sharing policies?	
No	Does the LEA website indicate if student PII is shared with third parties?	
No	Does the LEA website indicate if PII shared with external researchers	
No	Does the LEA website indicate if PII shared with ed tech companies?	
No	Does the LEA website have a list of approved online services or "apps" used in classroom?	
	Communications Best Practice: Display contact information prominently on your website, so that it is clear whom parents can contact if they have questions, comments, or suggestions. When possible, consolidate information about data practices and privacy protections into a single page or section on your website. Add a "Search" tool to your website so that visitors can easily find relevant information on data practices using common keywords. https://studentprivacy.ed.gov/resources/transparencybest-practices	Comments ♠TOP
No	Does the LEA website list contact information if parents have questions/comments/suggestions about district data sharing and student privacy policies?	
No	Does the LEA website navigation menu include a section indicating where to find data	

	practices/student privacy information?	
Yes	Is a search tool present on LEA website?	
No	Search for "FERPA" leads to privacy-related information?	
No	Search for "annual notification" leads to privacy-related information?	
No	Search for "student privacy" leads to information regarding the protection / privacy of education records? (specify in comments)	
No	Search for "directory information" leads to DI policy?	
No	Search for "PPRA" leads to privacy-related information?	
No	Search for "technology" leads to privacy-related information?	
No	Search for "applications" leads to privacy-related information?	
No	Search for "apps" leads to privacy-related information?	
No	Search for "privacy" leads to privacy-related information?	
No	Search for "confidentiality" leads to privacy-related information?	
No	Search for "disclosure" leads to privacy-related information?	
No	Search for "security" leads to privacy-related information?	

No	Does the LEA website include a glossary with definitions & links to relevant privacy laws, regulations, or policies?	
No	Does the LEA website have language translations available?	