

Privacy Compliance Review Report | Fall 2021

Freedom Preparatory Academy

About the Annual Privacy Compliance Review

Utah Board Rule R277-487-3(1) requires the Utah State Board of Education (USBE) to conduct an Annual Privacy Compliance Review of LEAs. As a part of this review, LEAs are required to submit evidence to USBE showing that the LEA is meeting certain requirements set forth by federal and state law regarding privacy practices. The evidence is reviewed by the Student Data Privacy Team at USBE.

More information about the review can be found on the Annual Privacy Compliance Review page in our Data Manager Course in Canvas (no sign in required):

<https://usbe.instructure.com/courses/326/pages/annual-privacy-compliance-review>

About this report

This report outlines the Student Data Privacy team's findings after reviewing the evidence submitted by your LEA. The report is broken down by each of the evidences collected in Fall 2021. For each evidence you will find your LEA's **overall status for that evidence, review notes, suggested or required changes, and resubmission information.**

Contact

If you have any questions or concerns about your report, please contact privacy@schools.utah.gov or **Katy Challis** at katy.challis@schools.utah.gov.

Annual Notice of FERPA Rights

Survey submission:	none
Survey submission date:	n/a
Review date:	9/30/2021
Reviewer:	Katy Challis
Status:	PASS
Page URL:	-
Document URL:	https://freedomprep.net/wp-content/uploads/2019/10/FPA-Directory-Info-Notice.pdf
Other relevant documents/pages:	-

Review notes: The last time we reviewed your Annual Notice of FERPA Rights it received a "PASS." You did not resubmit your Annual Notice of FERPA Rights, but assuming you have not made substantial changes to the notice it should still meet all requirements.

Required changes: No required changes.

Resubmission: No resubmission required.

Notice of Forwarding Records

Review date: 9/30/2021

Reviewer: Katy Challis

Status: **PASS**

Other relevant documents/pages: -

Review notes: The last time we reviewed your Annual Notice of FERPA Rights we found that it contained a notice of forwarding records to other schools. You did not resubmit your Annual Notice of FERPA Rights, but assuming you have not made substantial changes to the notice it should still contain the notice regarding forwarding records.

Suggested changes (optional): No suggested changes.

Resubmission: No resubmission required.

Directory Information Notice

Survey submission: Link

Survey submission date: 9/29/2021

Review date: 9/30/2021

Reviewer: Katy Challis

Status: **PASS**

Page URL: -

Document URL: <https://freedomprep.net/wp-content/uploads/2019/10/FPA-Directory-Info-Notice.pdf>

Other relevant documents/pages: -

Review notes: The Directory Information Notice you submitted meets all requirements.

Required changes: No required changes.

Resubmission: No resubmission required.

Military Recruiters and Institutions of Higher Education Notice

Review date: 10/25/2021

Reviewer: Katy Challis

Status: **PASS**

Other relevant documents/pages: -

Review notes: You previously received an 'INCOMPLETE' on this. However, the Directory Information Notice you submitted has 'institutions of higher education' added along with military recruiters, which addresses the previously suggested changes.

Suggested changes (optional): No suggested changes.

Resubmission: No resubmission required.

Student Data Collection Notice

Survey submission: none

Survey submission date: n/a

Review date: 9/30/2021

Reviewer: Katy Challis

Status: **PASS**

Page URL: -

Document URL: https://freedomprep.net/wp-content/uploads/2019/11/Student_Data_Collection_Notice.pdf

Other relevant documents/pages: -

Review notes: The last time we reviewed your Student Data Collection Notice it received a "PASS." You did not resubmit your notice, but assuming you have not made substantial changes it should still meet all requirements.

Required changes: No required changes.

Resubmission: No resubmission required.

Data Governance Plan

Survey submission: none

Survey submission date: n/a

Review date: 9/30/2021

Reviewer: Katy Challis

Status: **PASS**

Page URL: -

Document URL: <https://freedomprep.net/wp-content/uploads/2019/10/FPA-Data-Governance-Plan.pdf>

Other relevant documents/pages: -

Review notes: The last time we reviewed your Data Governance Plan it received a "PASS." You did not resubmit your plan, but assuming you have not made substantial changes it should still meet all requirements.

Required changes: No required changes.

Resubmission: No resubmission required.

Metadata Dictionary

Survey submission:	https://freedomprep.net/ferpa/
Survey submission date:	9/29/2021
Review date:	12/21/2021
Reviewer:	Katy Challis
Status:	INCOMPLETE
Page URL:	https://freedomprep.net/ferpa/
Document URL:	https://freedomprep.app.learnplatform.com/new/public/tools
Other relevant documents/pages:	"FPA APPROVED RESOURCES, VENDORS, APPS, WEBSITES OR SERVICES" - https://sdpc.a4l.org/district_listing.php?districtID=6926 ; "META DATA DICTIONARY DATA ELEMENTS" - https://freedomprep.sharepoint.com/:x:/s/FPAIT/EYVkcW1mMidCnVQzHKcK5MB-Y4DoMNXXhNoydFFN34bOg?e=VJMxf2
Display, document, or tool used:	Learn Platform AND SDPC
Review notes:	See review notes in the tables below.
Required changes:	See required changes in the tables below.
Resubmission:	After making the required changes, use the following link to resubmit your metadata dictionary: https://usbe.az1.qualtrics.com/jfe/form/SV_6sWyyGJ6OKWx5Ma

Requirements	Notes	Status	Required changes
Publicly posted on website:	Yes	PASS	No required changes.
Data elements listed:	Your metadata dictionary includes a list of data elements shared with recipients.	PASS	No required changes.
Data element definitions:	Your metadata dictionary includes definitions of the data elements shared with recipients.	PASS	No required changes.

Required recipients	Usage Notes***	Listed	Purpose	Justification	Exception	Required changes
Adobe	Used	PASS	PASS	MISSING	MISSING	Add or update any missing or incomplete information indicated in
SIS (Aspire)	Used	PASS	PASS	MISSING	MISSING	
Canvas	Used	PASS	PASS	MISSING	MISSING	
Dynamic Learning Maps (DLM) /KITE	Not used	N/A	N/A	N/A	N/A	
Google Workspace	Used	PASS	PASS	MISSING	MISSING	
Google Classroom	Used	PASS	PASS	MISSING	MISSING	

Office 365	Used	PASS	PASS	MISSING	MISSING	information indicated in this table to your metadata dictionary.*
RISE	Used	PASS	MISSING	MISSING	MISSING	
Online Registration Tool	Not used	N/A	N/A	N/A	N/A	
USB/UTREx	Used	PASS	MISSING	MISSING	MISSING	
Utah ASPIRE Plus	Used	PASS	PASS	MISSING	MISSING	
Other LMS	Not used	N/A	N/A	N/A	N/A	
Other Productivity Tool	Not used	N/A	N/A	N/A	N/A	

*** Based on grade levels in your LEA as well as your responses to the survey, in which you indicated which of these edtech tools are used in your LEA.

* More information—including a template, detailed instructions, and webinar recording--can be found on the Metadata Dictionary page of our Data Manager Course in Canvas:
<https://usb.einstructure.com/courses/326/pages/metadata-dictionary>

Biometric Information Collection Notice

Survey submission: none
Survey submission date: n/a
Review date: 11/9/2021
Reviewer: Katy Challis
Status: N/A (no biometric information collected)

Page URL: -
Document URL: -
Other relevant documents/pages: -

LEA collects biometric information: No

Review notes: You indicated in the survey that your LEA does not collect biometric information on students, so this notice is not required.

Suggested changes (optional): No suggested changes.

Resubmission: No resubmission required.

*** Based on your response in the survey.

PPRA/UTAH FERPA Policy and Notice

Due to potential legislative changes that may relate to PPRA and Utah FERPA, we will not provide feedback on your policy and notice until after Utah's 2022 legislative session.