



Cypress-Fairbanks ISD Data Governance Guidelines

Introduction

Protecting our students' and staffs' privacy is an important priority and Cypress-Fairbanks ISD committed to maintaining strong and meaningful privacy and security protections. The privacy and security of this information is a significant responsibility and we value the trust of our students, parents, and staff.

The purpose of the Data Governance Guidelines is to institute effective data governance by establishing accountability, ensuring that the district's data is accurate, accessible and protected, and by establishing responsibility along with procedures to be used for the management and protection of information.

District employees are subject to regular audits to ensure they are compliance with all laws, regulations, and district polices.

The Data Governance Guidelines are reviewed and updated at least annually or as needed per evolving laws and regulations.

Scope and Regulations

Proper management of school district records, whether in paper or electronic form, is not only a necessary part of every staff person's job, it is also a legal requirement. The Texas Local Government Records Act, Chapter 201, states that as a public school district employee, you have an obligation to correctly and efficiently maintain the records in your possession to comply with standards for public access, parent/student access, and for legal or audit purposes. All employees must know the records for which they are responsible, the length of time they must be retained, and how to maintain and then discard them in the correct and legal manner.

Every Cy-Fair ISD staff person is responsible for one or more types of school district records. These records might involve student information, employee information, purchasing, training, phone messages, meeting agendas, webpages... the list seems endless. Read on to learn about proper handling, storage, and destruction of district records.

Cypress-Fairbanks ISD will abide by any applicable regulatory acts including, but not limited to:

(CIPA) Children's Internet Protection Act

CIPA requires districts to put measures in place to filter Internet access and other measures to protect students.

<http://www.fcc.gov/guides/childrens-internet-protection-act>

(COPPA) Children's Online Privacy Protection Act

COPPA puts special restrictions on software companies about the information they can collect about students under 13. So, students under 13 can't make their own accounts, teachers must make the accounts for them. In making the accounts, teachers need to be aware of their responsibility under FERPA.

<http://www.coppa.org/>

(FERPA) Family Educational Rights and Privacy Act

FERPA requires that schools have written permission from the parent or guardian in order to release any information from a student's education record. So the most important thing is that, with some very specific exceptions, you shouldn't be sharing student information with apps and websites without parent permission.

<http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

(HIPPA) Health Insurance Portability and Accountability Act

Used to measure and improve the security of health information.

<http://www.hhs.gov/ocr/privacy/hipaa/understanding/>

(PCI DSS) Payment Card Industry Data Security Standard

This covers the management of payment card data.

<http://www.pcisecuritystandards.org/>

(PPRA) Protection of Pupil Rights Amendment

Gives parents and minor students' rights regarding surveys, collection and use of information for marketing purposes, and certain physical exams.

<http://www2.ed.gov/policy/gen/guid/fpco/ppra/index.html>

The Texas State Library and Archives Commission (TSLAC) sets the required minimum standards for records management in local governments. The commission has created RETENTION SCHEDULES which Cy-Fair ISD must follow in order to comply with the law. These schedules list the types of records that a school district is required to keep, and specifies the amount of time we are required to maintain that type of record. This requirement is addressed in our Board Policy CPC (Legal) and CPC (Local).

Data Retention Periods

Using the TSLAC requirements, the Cy-Fair ISD Records Center posts retention requirements for most district records on the intranet, <https://inside.cfsd.net/departments/records>.

What is a record and why do we care?

According to Texas Local Government Code Section 201.003, a School District record:

- Documents the transaction of district activity and business
- Is created or received by a school district staff person or board member
- Is a record whether open (available for public access) or closed
- May exist in any medium – paper, electronic, photo, film, etc.

Types of Storage

- Paper / Hard Copy
- On-Site Campus/Department
- Off-Site at Records Center
- Electronic
- District Network Drive (S:/, H:/)
- Districtwide Database (EX: Laserfiche, E-School, Groupwise)
- No storage of district records on removable disk or hard drives.

School records DO NOT include extra copies of the original document, blank forms, or stocks of publications.

The process of managing records is important for the following reasons:

- Improves access to information.
- Controls the amount of materials taking up valuable office, server or cloud space.
- Reduces operating costs.
- Minimizes litigation risks.

- Safeguards vital information.

Retention Terms and Guidelines

“Retention” - The minimum amount of time we are legally required to keep a record.

“TEXAS STATE Library and Archives Commission” - Agency responsible for setting and maintaining state standards for records retention.

“Retention Schedule” - A document that lists the record series of an organization, with mandatory minimum retention periods for each records series.

“Records Series” - A group of records, all with the same function, regardless of format

Examples of record series:

- Construction Records
- Correspondence
- Academic Records

Schedules of the most common School District records are found at inside.cfid.net (choose “depts,” then “Records Center”)

The intranet page does not list every category of record. If you or your department requires the retention schedule for more specific records, it is your responsibility to contact the District’s Records Manager, recordsdept@cfisd.net, to obtain that information. A retention schedule specific to your department or area of responsibility can be created for your use.

Electronic Storage of District Records

Things to remember:

- At least one other person should be aware of your file location and system.
- These should ALWAYS be filed in a network drive.
- Use a folder system (usually by year) that allows easy access and easy deletion when the time comes.
- When scanning items into network electronic storage, the original paper copy may be destroyed. BUT - Please make this decision with care!

Email Retention

CFISD retains all incoming and outgoing email in either your Outlook account, or the GWAVA archiving system. A program is in place to permanently delete district email after 5 years.

Most email does not have a long retention requirement.

You may or may not have direct access to all 5 years of your email.

If you receive or send email that contains the RECORD COPY of items that have a long retention requirement (more than 5 years), it will be necessary for you to store that email in another way.

Printing the email and filing the paper copy OR scanning the copy or otherwise creating a pdf for filing on a network drive are the two options we suggest for keeping email long term.

Much of our school district business is conducted through email correspondence, and these emails are considered School District records. In order to adequately comply with most retention requirements, Cy-Fair ISD maintains our email database for a period of 5 years. During that period, any email that you have created or received through the district’s Microsoft Outlook system is retrievable.

If you are responsible for records that require a retention longer than 5 years, and if those records are stored only in email form, it will be necessary for you to save those records in a different format. (Print a paper copy of the item and file it, or otherwise electronically save it for the required period of time.)

Safe Storage Practices

Whether the records you hold are in paper or electronic form, it is important to use safe storage practices. The following are considered safe storage practices:

- Use a filing system (usually by year) which allows for easy access, and for removal of records when the time comes for destruction, deletion, or off-site storage.
- At least one other staff person should be aware of the location and filing system for your records, whether or not they have direct access.
- Electronic records must always be stored on a network drive such as H: or S: , or on a Cy-Fair ISD database system, such as E-School or Laserfiche. These files are securely stored and are safe for records storage. Your Desktop, C: drive, or “My Documents” folders are susceptible to loss if your desktop or laptop computer fails.
- Make sure paper records are stored at least a few inches off of the floor, and are generally secure from flood, theft, accidental destruction, and other potential damage or loss.
- Be sure that the records you use, view or store are never accessible to unauthorized persons.

Securing Electronic Data at Rest

CFISD servers offer end to end fault tolerance, ensuring all backups, updates, patches, are completed.

Any sensitive information is stored with 256-bit encryption.

CFISD data servers are stored in a Tier 4 data center and can only be accessed by a authorized personnel.

Sensitive data will not be stored on any unencrypted computer systems or USB devices.

Securing Electronic Data in Transit

Sensitive information can only be gathered from within our district or by using authorized credentials with our login portal or VPN access.

Conditional access blocks users from logging into any accounts from outside of the United States.

All network closets remain locked and can only be accessed by authorized network personnel.

Sensitive information will not be sent through unencrypted email.

On-Site Storage

Things to KEEP IN MIND:

- Use a filing system (usually by year) which allows for easy access, and for removal of records due for destruction or off-site storage.
- At least one other person should be aware of the location and filing system for your records, whether or not they have direct access.
- Make sure paper records are stored at least a few inches off of the floor, and are generally secure from flood, theft, unauthorized viewing, accidental destruction, and other potential damage or loss.
- Always keep sensitive information locked up.

Long-term Storage at the Records Center

The Records Center accepts records:

- Listed in the schedule with a retention period of 4 years or longer.
- Packed by record year in proper-sized storage box(es).
- For which frequent access is no longer required.

Preparing Records for Storage

- Obtain Records Center Storage boxes – (15”x12”x10” – Distribution Catalog #20-000001). The use of any container other than this standard box is not permitted.
- DO NOT pack tightly. Do not tape box lids.

- Pack only one record series and one school year, fiscal year, or calendar year (whichever applies) in each box or series of boxes.
- Mark boxes with a dark marker at one end of each box as follows:
 - Number boxes consecutively and separately (Ex: for 2 boxes of finance records for 2010-11, label “1 of 2”, and “2 of 2.”)
 - List record title & year of the records (Ex: 05/06 attendance audit)
 - List your school or district department name.

Transfer of Physical Records

- Place items in the required records storage boxes.
- Print Transfer of Records form from inside.cfid.net. Fill out completely and fax or email to the Records Ctr.
- Place the boxes in a secure location. Tape a copy of the form on your box or stack of boxes. Pick-up is done by the distribution center staff and may take 2 weeks (longer in the summer).
- It may be necessary for you to save a more detailed description of the contents of each box. Keep this in your office for use when/if records need to be retrieved.
- Obtain the Transfer of Records form from the intranet and fill it out completely and specifically...(Go through each blank.) Note that the label we create will match the information on this page, not what is written on the box. Any detailed listing of a box’s contents for future reference should be kept by you, along with a copy of this form.”

Records Destruction

When your records have met their required retention period, it is important to destroy or delete them in a timely manner. District removal and destruction procedures are required when destroying paper records and other items if they:

1. Are record copies of an item listed on the District’s retention schedule.

OR

2. Have personal identifiable information of a student/staff member.

The Records Department conducts a shredding program for this purpose. Boxes of paper records or pages with personally identifiable information must be picked up and taken to a central location where they are properly disposed of. Items not considered District records, and not containing personal information can simply be thrown away or recycled.

Please contact the Records Center at recordsdept@cfisd.net if your campus or department needs the current form to request pick-up, or if you need detailed information about this process.

Why dispose of records?

- Creates physical space.
- Reduces operating equipment, storage supply, and personnel costs.
- Speeds up retrieval.
- Provides legal protection (when done properly).

When to Destroy Records

Maintain a regular schedule. Don’t wait until you run out of room but follow the retention schedule.

It is illegal to destroy any record that is involved in ongoing litigation, public information request, or audit.

Shredding of any district record may NOT be done at campuses or in offices. This rule protects staff from liability & completes our requirement of knowing when a particular record has been destroyed.

Contacts and Information

The Records Department is dedicated to preserving one of Cy-Fair ISD's most valuable resource - records and information. Properly managed records can result in considerable cost-savings and operational efficiency. The Records staff has expertise in legal statutes and local policies regarding records retention requirements and assists campuses/departments in developing comprehensive records management plans.

CONTACT US HERE:

Cypress-Fairbanks I.S.D. RECORDS CENTER

281-807-8140 / recordsdept@cfisd.net

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