

## **Burnt Hills-Ballston Lake Board Meeting Transcript – Spring Policy Forum - April 30, 2020**

**Patrick McGrath:** So, um, so on the on the uh the policy review we we have two in first read that that we are going to suggest potentially that we open up and start talking about. Um Remember that any time the Board changes a policy um we have to tell the public that we're considering changing it and we have to give at least 14 days notice before the Board votes on any changes. So the idea of these policy forums is that sometimes at the Board meetings it just gets too kind of bogged down in detail to have these kind of conversations in the middle of a Board meeting. So we've started having these forums a couple of times a year where we take some time separate from the Board meeting but we make it a public meeting and we talk about the policies that way when we get back to the Board meeting the Board members who were at the meetings can just sorta update the rest of the Board and we share it out with them so it just streamlines it a little bit. So first read and second read basically just mean the first read means we're announcing the policy a we're making a public announcement that we might want to change this policy and then the second read is really kind of the time when we start to discuss the substantive changes to the policy and then um and then we after that second read which is usually two weeks and then two weeks so we give it plenty of time more than required um and then at the end of the second read period then it's four weeks in we put it up for a vote and if the Board approves it, then the policy changes. So that's kinda the process here. So um so we have two policies we want to talk about that we're gonna propose that we um so the two policies in the top there we a in first read we want to just talk about potentially opening up but the ones we opened up in first read at the Board meeting the other night are in blue down under in the second read section. A lot of this has to do with student data privacy um and it's required by law that we have this stuff uh in place um as soon as pos as soon as possible no later than July 1<sup>st</sup> of this year. So um so let's start uh with uh but but the first one has nothing to do with student privacy and it's basically just a new policy that's needed for inventory. We don't have a policy right now in our policy manual that talks about uh the level at which items that cost over a certain amount have to be inventoried and so um Brenda asked that we introduce this policy so click on the sample policy there um. She just she she suggested uh in compliance with the with what the auditors want that we would have a policy that said that any equipment or fixed assets that are valued at over \$1,000 would be inventoried and inventory would be maintained by the Business Office in cooperation with all building and department administrators. So this is um something that we do but we don't have in policy and the auditors want it in Board policy so the proposal is that we introduce this at the next Board meeting and get this into the into the pipeline and get it approved as soon as possible.

**Dave Versocki:** So just a quick question an observation so our our practice has been to only put stuff in our asset system with a \$1,000 value or higher.

**Chris Abdoo:** That's our, Patrick, do you want me to take that?

**Patrick McGrath:** Yeah, go ahead.

**Chris Abdoo:** That's our that's our capitalization threshold for what we deem a capital asset. However, we inventory any item that's over that amount and ones that are susceptible to misuse or misappropriation. For example, there are some technology devices we also keep in inventory.

**Dave Versocki:** I mean, so, I mean all I was getting at is um, ya know, I get why we have put a \$1,000 threshold because the inventory process becomes very cumbersome um and it may not be worth the squeeze on the depreciation of those things, right. So is everything else that we could consider a, ya know, a laptop, a computer, a projector, all those things are gonna be technology inventoried not asset inventoried.

**Chris Abdoo:** Correct and I think that that's something an important distinction and Tracy is on the call. We keep a very good technology inventory if say a \$500 or \$400 Chromebook. We might not need to do that same tracking mechanism for a \$300 student desk if that makes sense.

**Dave Versocki:** Understood. Okay. I just wanted it clear. I've been on both sides of this one. Uh

**Chris Abdoo:** Yeah.

**Dave Versocki:** down at the \$150 level which is I can't even tell you what that is in public. It's not fun so ok.

**Patrick McGrath:** So we can get this one into into the system. Any other questions on this one?

**Dave Versocki:** No, thanks.

**Patrick McGrath:** Ok. The definite one that we're gonna propose that we put into first read is the uh is policy 8630. If you want to go to our current policy 8630 which is in the first column there, it's called Data Management and it's been in place. It was last revised in 2008. Um and Tracy this is the answer that I got from when I contacted the policy people over your question about um a disaster recovery plan for data. So this is the place this is the policy that the disaster recovery plan would be attached to as an exhibit under this policy Data Management but if you go back to the policy worksheet um I'm gonna just just share my screen. Back on the policy worksheet you'll see that a they have sample policies 8630 from NYSSBA and it's much more well significantly more extensive than the than the Data Management and it talks about computer resources and data management. And this is one that we would get um that we would uh suggest that we get updated. We get that in and then we as we work on our data uh disaster recovery plan again auditors want us to get done that would be a part of this policy or it would be a support for this policy.

**Tracy Falvo:** So that would still be our own data recovery, ya know, disaster recovery plan and then we then we attach it as an addendum to?

**Patrick McGrath:** Yeah. An exhibit probably for this for this uh policy so um basically, it, ya know, says that the superintendent and we can easily edit this stuff um is responsible for

designating a coordinator who will oversee the use of the district computer resources, prepare uh training programs for development of district staff in computer skills, the appropriate use of computers, the superintendent working in conjunction with the purchasing agent will be responsible for the purchase and distribution of computer software and hardware throughout schools, uh the superintendent skipping down below in the note there and then um so the so the paragraph at the bottom of the first page says the superintendent working with the you your title your title would establish regulations governing use and security of districts resources. Uh the security and integrity of the district's computer network is of serious concern to the Board and the district will make every reasonable effort to maintain the security of the system. All users of the district's resources shall comply with this policy and regulation as well as 4526 which we are going to get to. Uh failure to get to comply may result in disciplinary action and then um it also says that uh um, ya know, it's a privilege uh and to use the network and this is kinda where it talks about our ability to access any material that's stored on any district equipment. So it's basically, ya know, just establishing in policy that we own the network and the and the devices. And uh the next paragraph down um refers to the series of bullets um that called for a disaster recovery plan if you look at the last bullet. So that this is where we never had a disaster recovery plan and we never mentioned in our policy so by getting this policy in and up to speed then we can then have the disaster recovery. It will be filed right on the webpage under this policy. Anything that jumps out at people as you read through this?

**Dave Versocki:** And just to be clear, Patrick, ya know, when we we read this about data, right?, it's just electronic data in this policy not this does not apply to any of our paper records, correct?

**Patrick McGrath:** Correct.

**Dave Versocki:** And my just my other question would be is do we have a corresponding one for paper records? I'll ask. Do we need one/have some that addresses the non-electronic records? That's all.

**Patrick McGrath:** Um I

**Dave Versocki:** It would be just asking the question about

**Patrick McGrath:** Yeah, good point. So this kind of like calls for us to basically do a lot of the things that the NIST standards. This was written before 2D. This is a sample policy that was written in 16 2016. So this is uh before the 2D but after probably, actually, I think it was after 2D was passed as a law but before the regulations were developed. So this kind of calls for all the same kind of things that the NIST standards are going to ask us to do. So it really almost would be anything we do with the NIST standards would kind of file under here, I think. Ya know, it's as far as policy, good policies, procedures, practices. Maybe like samples of letters where if we had a breach, what would the letter look like that we would send out that could go that's part of the disaster recovery plan probably but it would make sense to go under this policy um password policies, ya know, good updated password policies that this this is basically calling for regulations that that would address all these things. So I think this gives teeth kind of to some of the things that we need to do in order to be in compliance with these new standards, these NIST standards that govern uh information.

**Dave Versocki:** Quick question, Patrick, uh we're talking about, essentially we're addressing uh EdLaw 2D, right, and since that's law we talked about this before in policy, do we need to have policy that essentially restates the law, right, so it's that the law requires this, well, actually, I believe the correct, somebody might want to correct my language, the regulations developed as part of the law address this, correct? So we are following the regulations as dictated by New York State we need to restate those in here or does our policy simply state that we're gonna follow the regulations that have been developed as a result of EdLaw 2D. That's my only question.

**Patrick McGrath:** Yeah.

**Dave Versocki:** Cause we've talked about this before, I think, under policies you don't need to restate what's required by law.

**Patrick McGrath:** Yeah. The only difference here, I think, Dave is that the that the the EdLaw uh stuff kind of requires you to have have policies that address these things, right, so that they that they don't necessarily say you must change your password every 30 days or every 60 days. They just say you gotta have a password policy. This is the part that kind of says, ya know, ok, so we have a password policy and this is where it's gonna be.

**Dave Versocki:** So I guess, oh so, alright, thank you, so you're going to you're going to put your I want to say it is a password policy as in our standard. You're talking about the regulations, right, so this is what you're you're technical policy about managing the passwords looks like. That's gonna be appendix a or whatever ok.

**Patrick McGrath:** Right, like attendance says we have to be in school 180 days a year and so it would be foolish to do a policy that says we, ya know, will be in school 180 days a year because that's just a law.

**Dave Versocki:** Right.

**Patrick McGrath:** But this is the law says you need your own local policies on passwords, separation of duties, remote access all but they all have to be in guided by these national standards called NIST Standards. So so I

**Dave Versocki:** Are we gonna have just so my question I internally in my other life we're having the same conversation about so like our password policy isn't going to be P8360-1 or 8630-1. It's just gonna be an appendix as part of this policy.

**Patrick McGrath:** Right. I would suggest that like this is basically saying and we may this is just the sample language honestly this particular policy I just got this this afternoon from NYSSBA because Tracy and I in preparation for this meeting were talking about the disaster recovery plan and we were sayin' should the disaster recovery plan be part of 8635 which is one of the next ones we're gonna get to um and we said no it doesn't really look like it so I asked them the question, ya know, we hired people to kind of be the experts on the policy and she always gets right back to me and she's like no that should go under 8630 and here's the sample.

So Tracy might want to look at this sample and kinda tweak it and make suggestions because this is in my mind this is the this is the policy that that this will look a little different now that we know what 2D looks like. Tracy, I think we want this to kind of reflect or introduce some the new a lot of the new regulations. Cause the next one we're gonna get to. There's five that we're doing today. This is the second one. The next one of the next ones were gonna get to deals with software and purchasing software, contracts for software, all that stuff. But this deals with processes about computers and about handling data inside the district. I think that this one we want to do a little work on this one um and bring it back to the board that basically um lets this policy be an introduction to the new NIST Standards that we're going to be following and that kind of stuff.

**Dave Versocki:** Yeah, yeah and you're almost talking about it's like equivalent of having a student handbook, right. You know the policy says we will and then we create, right. You create the practices that meet the needs of the policy. So I think that's what you are getting at here and I just that's what I was trying to I think maybe that's a good example of what you're trying to articulate.

**Patrick McGrath:** Definitely, so let us this is just a first read. This one hasn't really been this is just kind of hitting our radar. If we got back to the policy, back to the policy uh I'm gonna just um gonna share my screen. It's easier than jumpin around. Present.

**Dave Versocki:** I'm making notes cause I'm on the other side of this. I'm in your seat recommending for this one for my real job.

**Patrick McGrath:** Ha. Good. Alright, so I'll just drive here a little bit. So um so we we looked at the proposed inventory. We looked at potentially revise. It sounds like I think in looking at this it makes sense that we would we would revise this one and so we'll introduce both of these as a first read at the next board meeting and we'll continue to to uh provide some update we'll continue to work on them and get them in front of the board. So moving down into the ones that we introduced the other night. There's three more that we want to talk about today. The first ones quick, the next two will take a little time. This first one is the Independent Educational Evaluation. You click on the current policy as it stands right now. Um this is the issue right here: Parents or guardian should file a written request within 90 days and uh that can't been there. It's as simple as that. We're not allowed to put a time limit on when the parents can request an independent evaluation if the parents disagree with what the CSE or the CPSE, the Committee on Special Education or Preschool Special Education. If we if they disagree, um our current policy says that they have 90 days to file um a right to appeal that are binding and go to an independent evaluation which we pay for and see if they have any um if they can get a different opinion and the bottom line is we're not allow to put a time we were told that laws have changed and we have to get rid of that time frame. So um so the new proposed policy is simply so that's over here the new policy simply says parents or guardians should file a written request. It gets rid of the 90 days.

**Dave Versocki:** Yup.

**Patrick McGrath:** Simple enough.

**Dave Versocki:** Yup.

**Patrick McGrath:** So that's just a simple one that we need to move through. If there's any other questions on that.

**Dave Versocki:** Nope.

**Patrick McGrath:** Alright. So then the next two um policies uh are specifically uh things that need to be changed in order to be in compliance with the new EdLaw 2D. Um we're right on schedule for this. It needs to be done by July 1<sup>st</sup>. The law is a whole bunch of things protecting student data. So the two that we're gonna look at are policy 5500 which is Student Records and policy 8635 which is Information Security Breach and Notification. So um start with Student Records. We'll go into the proposed new policy. This has been written to reflect Education Law 2D um as you can see. So um so we're gonna recommend that we start from scratch and we just work off this new policy um we can always go back and see at the end that it doesn't include but we we think we should start from scratch here. So um in, Tracy, see how it says so the gray areas are the notes that they give us so it modified this policy to reflect the new state regs implementing 2D uh regarding data privacy and security. Additionally, due to uh understanding of the word shall replace shall with will or must. That's good to know. Um so why don't we just kinda read through it, look through it and uh there's the bold print places are where we need to make decisions. so some general language in the introduction. These by the way 5500 and 8635 are the two places that are the required that NYSSBA is recommending that we change in order to be compliant. So by doing these two policies, we'll be able to have this the requirements that meet the law. So they put run a list of definitions um authorized representative, what is an educational record, what's an eligible student, legitimate educational interest, PII you've heard that term personally identifiable information as it pertains to students, is information that would allow a reasonable person in the school or its community, who does not have personal knowledge of the relevant circumstances, to identify a student with reasonable certainty. A seventh grader that lives at 58 Goode Street, ya know, that would sort of allow ya to identify who that person was; someone whose email address is ya know cmcgrath26 ya know at bhbl.org that's gonna be a person with the first initial C the last name McGrath and he's gonna graduate in 2026 so it's personally identifiable so simply entering that email address as an ID is is um something that would make that identifiable. There is a um the volunteer stuff is down below so school official is any person that has a legitimate educational interest in a student record, a member of the Board of Education, a person or company who the district has contracted to perform a special task, those are school officials or parents serving on an official committee, school official. Then they they have the option of adding extra volunteers. So this would be like the first thing we need to decide here. Volunteers may be considered school official for the purposes of access to PII if they are under the direct control of the district, are trained in requirements of the law under this policy and have legitimate educational interest and the district uses reasonable methods to limit access to only information that is necessary. Volunteers may only access the information necessary for the assignment and must not disclose student information to anyone other than school officials with legitimate educational interest. The building principal will provide adequate training on confidentiality. So I guess the question is do we do we have the level of volunteers that we need to have text here or should we just not have anything referring to volunteers.

**Tracy Falvo:** Well, it's interesting. Um another um question came up today about ya know about giving emails to to the question was an email that was somebody that was paid but then the conversation went further to the drama club for instance like it involves um volunteers as well so it probably is an area that we would want to include um.

**Patrick McGrath:** Chris what's our process through HR if somebody becomes a volunteer formally like um I'm thinking somebody wants to volunteer in the library or wants to an elementary library or something can they go through HR and get an ID and become is there a process an onboarding process for a volunteer?

**Chris Abdo:** In some cases, yes. I think it really depends on whether it's a regular volunteer or I also think it depends on whether or not they're going to be under if they're not ever going to be under the direct supervision or contact with a member of our staff. I know we go for example volunteer coaches go through the whole process the same as we would do for any other employee of the district. I'm not sure if a PTA volunteer comes in for a day to help in the library who is under the supervision of the librarian at all times if they go through that same process with the fingerprinting and everything else. It's something we can follow up with Mike Nickson to see where that line is drawn unless, Dave, you have any information on that as far as where at what point we require the whole process to occur or where we uh just kind of leave it.

**Dave Collins:** Uh yup, you said it very well. We we've been in discussion throughout this year in in relation to the onboarding process and, specifically, to us trying to maintain um a definitive process. Um we haven't come to a complete conclusion on that level we've talked about but certainly volunteer that would be spending time alone with children and is expected to direct them in a way coaching is one, our our um Robotics Club is another one that has has um a gray relationship the way you're talking about what we are trying to come to terms with is just what we talked about a classroom volunteer who may be asked to walk kids from one place to another. For example, from classroom A to classroom B that is where we haven't gone to the level of fingerprinting in in the the level that you're talking about obviously those individuals enter through our our vestibule, ya know, they're identified, they're brought to places then they are under the direction of a teacher for the most part but there are times when there are short periods of of movement um and we are discussing the level that we have to be um sensitive to that, obviously.

**Dave Versocki:** So one question and I that's that's good that we're thinking about it but in relation to the policy which is about access to student records though, right. This isn't walking the kids from the classroom to lunch. This is about will the volunteer have access to the student management system, the library system, ya know, that might have PII, isn't that the intent of this policy?

**Patrick McGrath:** It I think

**Dave Collins:** Absolutely, correct.

**Dave Versocki:** Let's get down now which volunteers. Does a volunteer coach have access to eSchool for any reason or do we consider Huddle, a coaching application, having PII in it regarding our student athletes, right, that's just one example you're that's the people we are really targeting in this policy so do we have the volunteers that meet that criteria?

**Tracy Falvo:** Can I also ask not just access to those systems per say but what about the data in those systems that's passed on from say the head coach or from the head club advisor. Does that apply to that as well? I think that's more likely to happen

**Chris Abdo:** Well, another question would be I think your volunteer coaches and anyone who had direct supervision over students is gonna wanna know if the student has a bee sting allergy, if they have anything, a food allergy, those types of things. I'm sure they have a legitimate reason to access that. Uh to the point that Dave was making the person who's walking the child from the library to the classroom perhaps not but I think that's a pretty important distinction and I think it's supervisory distinction, isn't it? Unless I'm thinking of it differently

**Dave Versocki:** Well, so, but, right, supervisory but to your point, ya know, if I had a volunteer coach, I'm just throwing that out there that's my favorite topic, right, ya know, and I'm going to be a coach without pay that's what a volunteer is, right, but I'm I'm a certified coach I have direct interaction; I'm instructing the kids; I'm in supervision; I may need that that safety information, right, that's protected information. So we might my only question is you were talking whether the block for optional volunteers is here. Yeah, I think the the volunteers who are in touch with this data need that training right so I think

**Tracy Falvo:** Absolutely.

**Dave Versocki:** that we have to cover ourselves from a volunteer perspective cause we are going to have maybe some instances of it that's all.

**Patrick McGrath:** That's that's the question here is it's really a question for the Board. We do use volunteers. I mean there's lots of option we just gave that and I betcha there's, ya know, 25 more areas. So we do use volunteers so I guess if the Board's comfortable with under certain circumstances volunteers having access to sensitive student data uh we have to assure you that there will be a process through which their onboarded they will be trained and and their given only access to the information that's absolutely necessary for that assignment that they have or the Board the Board also has the option to say the district prohibits volunteers from from accessing any student information.

**Dave Versocki:** That's right.

**Patrick McGrath:** That's where we are, right?



**Dave Versocki:** Yeah and ya know the first example you gave keeps the kinda eyes on hey don't give it access you don't give the volunteer the same kind of access that a full-time teacher. They may have unlimited or none but I would actually ask us to think about whether it's no access or it has to be yes they're gonna have some of that health information, ya know, because it's required I'm gonna be with a group of kids do I have to have their allergy information that's HIPPA information so.

**Patrick McGrath:** So in the discussion of this we would want to discuss maybe that with a larger Board but if if the Board feels comfortable then we have the text that we need for this.

**Dave Versocki:** Yup.

**Patrick McGrath:** Make sense?

**Dave Versocki:** Yup.

**Patrick McGrath:** Ok. Third party contractors is the next definition. That's a big one because it has to do with anybody else who had access to our data from outside which is often um vendors for software um so also we do things like ya know studies and and a and like ya know engage universities and third parties, people who want to study data for educational purposes, academic purposes um so they're gonna be discussed here as well so those are the definitions. So at the beginning of the school year, the district will publish a notification that informs parents and students currently in attendance of their rights under FERPA and New York State and the procedures for exercising those rights. A parent Bill of Rights for data privacy and security will be posted on the district's website and included in any agreements with third party contractors. That's an important one. So if you notice it says see 8635-E that's the last policy we are going to look at and that's where they want the Bill of Rights to be attached as an exhibit under policy 8635 so we do have a parent Bill of Rights right now but they're recommending some updates based on the 2D and it basically just lets parents know everything about their their kids data and what can and can't be done with it. So the notice and "Bill of Rights" can be published in a newspaper, handbook or other school bulletin or publication uh it will also be provided when they enroll during the year. Uh the notice and Parents' Bill of Rights will include a statement that the parent/guardian or eligible student has a right to: inspect and review the student's education records; request that records be amended to ensure that they are not inaccurate, misleading or otherwise in violation; consent to disclosure of PII contained in the student's educational records, except to the extent that FERPA authorizes that disclosure without consent; and also they have the right to file a alleging failure of the district to comply with FERPA and its regulations. Um so those are things that are in the Parent's Bill of Rights which I linked back on the policy. I linked the proposed parent new Parent Bill of Rights and also I think we can link the current one as well. The annual notice and Parents' Bill of Rights will inform parents/guardians and this just gives guidance to what should be in the Bill of Rights the Parent Bill of Rights. You can see the different these come right out of the law.

**Dave Versocki:** Does uh I guess I was, yeah, thanks. I mean yeah sorry. The the third I'm very familiar with the third party part um when it comes to the other ways we procure contracts. Like so we the BOCES are gonna have our own website that says hey districts if you're buying from us here are the contracts or that might end up in the inventory tool right to say that um these 10 contracts that you're buying off of these vendors are compliant right. Do we write that into our language? Do we have to does anything in here have to say ya know cause that your that we or the entities we um we buy through so like consortium like us right ya know a BOCES or an Erie two Erie one contract. I'm wondering do we need to reference that at all? and I don't know the answer. I'm just kind of thinking about it cause you have us listed as a third party. Um that's probably true by definition right in the state language that that don't they call out explicitly in the BOCES or State Ed as a third party?

**Patrick McGrath:** I mean maybe they they call other school districts a third party so where is it um the district will disclose educational records without consent to officials of another school district in which a student seeks to enroll or is actually enrolled. Um I mean when it comes to vendors, if we're giving data there because of the vendor that's not really you guys right? I mean you guys are just the conduit at BOCES the pathway along to the third party.

**Dave Versocki:** What I was saying was talking here about the um well I guess it's a little different cause you're just ensuring ya know what how you've chose to procure it means that we've we've taken that whoever the middle man is has taken that step to ensure that the terms of 2D are met right that's all I was trying to think through her if it matters in any of this language. Ok. I don't know if I have a concern or not just more of a conversation.

**Patrick McGrath:** So this is basically telling parents that it is our policy to disclose information across the district, to other school officials in the district that has legitimate educational interest also we can share it with other school districts #2; #3 it says that it can be released with third party authorized representatives for the purposes of educational program audit, evaluation and enforcement or compliance so we can get everything to state ed. That's we can we can upload student data which we do every night and this is basically telling parents that uh; #4 that the district, at its discretion, releases directory information without prior consent unless the parent guardian or eligible student has exercised their right to prohibit release um and it also says that we won't sell it. So directory information we'll talk about below. Chris is gonna want to talk about that a little bit but there is we're basically saying there's a bunch of data there's a group of a set of things that we do give away without asking for permission. Um that's unless they uh unless they exercise their right to prohibit the release to that information. um so this is why the parents need to get this on a yearly basis; #5 that this is by law that we are required to disclose a high school student's name, address and telephone number to military recruiters and institutions of higher learning unless again the parent or secondary school student exercises their right to prohibit the release without prior written requests of that um that doesn't look right there parent or secondary school student exercises their right to prohibit release of the information without prior written consent oh that should be another number forms of parents or students #6 um the procedure for exercising the right to inspect, review and request amendment of student records and then finally the district will provide information as a supplement to the "Parents' Bill of Rights" about third parties with which the district contracts that use or have access, this is a new one, that's what Tracy is working on that we this means that we will have to provide the contract

with every um with every software vendor that could possibly use the student's data that we do business with the parent has to have access to that contract. So we're using we're assume we're going under the assumption that by publishing those contracts on our website that gives the parent access, right Tracy?

**Tracy Falvo:** Right, um right now we'll likely put them in our app catalog which, ya know, is also accessible by the public.

**Patrick McGrath:** Mhmm. Note: School districts are not required to provide annual notice of all the exceptions to prior consent. The school district may also release student education records, or the personally identifiable information contained within, without consent, where permitted under federal law or regulation. So it's just basically giving this caveat to your point early Dave. If there's a law that says it, then we can do it. For a complete list of exceptions prior consent requirements see accompanying regulation 5500-R, Section 5. Section 5 sure. Make sure that that's updated. Um ok so then it gets down to the section on Directory Information. The district has the option under FERPA of designating certain categories as directory information that means that we can we're basically allowed to take certain things and release them to the newspaper, to yearbook company, that that's um accepted from FERPA uh um from protection right now those things are what are in bullets right here so name, ID, address, telephone number, date and place of birth, course of study, participation activities, sports, weight, height if member of an athletic team, dates of attendance, degrees and awards received, most recent school attended, grade level and photograph are all considered directory information e-mail address and enrollment status.

**Chris Abdoo:** Patrick, you want me to jump in on this one or?

**Patrick McGrath:** Yeah, go ahead.

**Chris Abdoo:** Alright, on this one we've spoke to counsel on this from Girvin and Ferlazzo and they've indicated that the two things that you should see crossed out the address and the phone number are not necessary for the district to publish to anyone that asks for them or that wants them and by the same token we spoke to the high school principal, Tim Brunson, and the rest of the administrators basically as far as when would you ever need address or phone number in any type of publication that the district would have? For instance, are you putting a student's address in the yearbook or their phone number in the graduation program? and the answer is we really have no need of that. It's really not in the spirit of the other Ed Law 2D stuff we've been talking about even though it's not specifically related to it and counsel was pretty explicit when they recommended that we remove those two items from the directory information. The rest of it is ok to keep cause we'd probably be using that in different types of programs or award banquets or height and weight stuff for some of the athletic competitions but there's no instance where we would need the address or telephone number which is why they decide they recommended that we eliminate it.

**Patrick McGrath:** So is everybody ok with with removing those two things from directory information? Recommending that forward to the full board? This talks about McKinney-Vento stuff. Just that the McKinney-Vento students living situation is treated as an educational record so now that we took address out it doesn't matter. So it's no one's address whether it's homeless address or whether it's their regular permanent address is gonna be is gonna be reviewed so this stuff is all cleared. Again, it says it but it won't this isn't even going to be necessary if we take out address. Optional sentence: The district permits parent/guardian to select the school's address as the student's address for purposes of directory information. Again, none of this is necessary if we take address out so I'm gonna just highlight this and say can be removed can be removed if is removed from directory information. Um social security numbers uh or other PII cannot be considered will not be considered directory information. Students who opt out of having directory information shared are still required to blank their student ID cards so uh we should maybe talk to the principals about that. It's just basically saying just because you can't you opted out of having directory information you still have to either if a a kid had to wear, display or disclose their student ID card. I don't know if that's applicable to us or not. I don't think we ever require people wear them or display them maybe disclose them if they're asked for some at certain situations but I'll check with principals on that cause we could possibly just delete that. And ah then it just talks about what you have to wait until you have 14 days to see if there's any objections before you can release that directory information once a student provides the "opt out" it remains in effect until the student is no longer enrolled then it's once a for all. It cross references a few other policies, references the laws, and ah that's pretty much it for 5500.

**Dave Versocki:** How do we track the opt out part? Is it a flag in eSchool?

**Patrick McGrath:** Tracy's shaking her head no.

**Tracy Falvo:** No, not not that I'm aware of. No.

**Patrick McGrath:** The only person that I know that has a master list of this stuff is Tara and I guess she is kinda the one that most things go through um that are going out publicly but um that's a good question, Dave. Is there a master is there a reason why it couldn't be flagged in eSchool? Could a cell be created like a field be created for that?

**Tracy Falvo:** Um I'm sure. I'm sure we could create something.

**Patrick McGrath:** In like in the directory portion of it.

**Tracy Falvo:** Um in the sec Well, the part I'm thinking of well there's probably a couple different places but um you can create custom um flags for in the same way that we have flags for uh 504 or IEPs and so forth that comes to mind. You could use another color and you can

**Patrick McGrath:** An exclamation point or something like that like a red exclamation point or something that shows up in that

**Dave Versocki:** Yeah and that that just protects you when you go to do an extract. If you do a filter on those, they don't their data wouldn't go to wherever. It's an easy way rather than ya know it's in a system that every kid has to be in so.

**Patrick McGrath:** Right, I agree. It's great.

**Dave Versocki:** Didn't mean to stick my nose in day to day operations.

**Patrick McGrath:** No, no, no. That's a great idea. Let's take that back and take a look at it. Ok so that's 5500. Pretty straight forward and it will keep us up it'll satisfy two things 2D compliance and Chris' concerns with the directory information. So now let's go back and the last one that we need to look at is the information security breach notification. And again, I'm gonna say if you look at our current policy 8635, it was adopted in 2015 so it was pre pre 2D um and it's relatively short. So I may suggest that we just go move over to um that we move over to the proposed new policy and start from scratch and just it incorporates the stuff that's in the other one. I looked at them both side by side. Um but I think that this one this one's written specific to the Ed Law 2D. There's a couple other laws as well that that the district has to abide by when it comes to um protecting information not just 2D. There's laws about employee information that we need to protect as well. State Technology Law 208 and the New York Shield Act which is talked about down here. So this one that was already in there um and also Labor Law 203-d protecting personal identifying information for employees. So this basically puts the 2D stuff into the same policy and makes it all one big place where we're committing to protecting information and data privacy. So the law says school districts must have a policy that that uh addresses the protection of PII and this is that policy as proposed by NYSSBA. So um that's what this whole paragraph is basically saying. So the Board of Education acknowledges the heightened concern regarding the rise in identity theft and the need for secure networks and prompt notification when security breaches occur. The Board adopts the NIST, the National Institute for Standards and Technology Cybersecurity Framework, the NIST Cybersecurity Framework for data and security protection. Um and then basically this is uh the Superintendent or Data Protection Officer, both of whom are here right now, uh Tracy's been our Data Protection/Data Privacy Officer for a few years, four years now, um since the Board appointed her every July but now we're ahead of our time because now every district needs to have a Data Protection Officer appointed by the Board every July. And she and I are responsible for ensuring that the district systems follow the NIST Cybersecurity Framework and adopt technologies, safeguards and practices which align with that framework. This will include assessment of the district's current cybersecurity state, their target future cybersecurity state, opportunities for improvement progress toward the target state, and communication about cybersecurity risk. The Board will designate a DPO to be responsible for the implementation of policies and procedures required in EdLaw 2D and it's accompanying regulations and to serve as the point of contact for data security and privacy in the district. Um and then we could say optionally the appointment will be made at the annual organizational meeting which I recommend that we do that on a yearly basis if there's no objection.

**Dave Versocki:** Nope.

**Patrick McGrath:** OK. So I'll write that in there. The Board directs the Superintendent of Schools, in accordance with appropriate business and technology personnel, and the Data Protection Officer (where applicable) to establish regulations which address three things: The protection of PII of students, teachers, principal under EdLaw 2D and Part 121 of the Commissioner of Education; and then, as I said, protections of private information under State Technology Law, NY SHIELD Act and also this #3 this Labor Law. The remainder of the policy just goes through those three things um and it kinda spells out what's needed for those three things. So first and the longest of the three parts is the PII. Um so PII as so here's here's so we'll talk about those three different areas that the Board's policy protects data. Um PII as applied to student data as defined in the Family Educational Rights and Privacy Act and we talked about that in Policy 5500 which includes certain types of information that could identify a student. It's listed in the accompanying regulation 8635R the reg that goes with this so it will be listed there. PII as applied to teachers and principals data, means results of APPR reviews that identify the individual teachers and principals which are confidential under Education Law 3012-c and 3012-d, except where required to be disclosed under state law. Uh um the Data Protection Officer so we could um move while will see every use and disclosure of PII by the district benefits will see every use and disclosure of PII by the district benefits students of the district to improve academic achievement, empower parents and students or advance efficient and effective school operations. However, PII will not be included in public reports or other documents. The district will protect the confidentiality of student and teacher/principal PII while stored or transferred using industry standard safeguards and best practices, such as encryption, firewalls and passwords. The district will monitor its data systems, develop incident response plans, limit access to PII to district employees and third-party contractors who need such access to fulfill their professional responsibilities or contractual obligations, and destroy PII when it is no longer needed. Certain federal laws and regulations provide additional rights regarding confidentiality and access to student records, as well as permitted disclosures without consent, which are addressed in policy that we just did 5500. Under no circumstances will the district sell PII. It will not disclose PII for any marketing or commercial purpose, facilitate its use or disclosure by any other party for any marketing commercial purpose. Further, the district will take steps to minimize the collection, processing and transmission of PII. Except as required by law or in the case of enrollment data, the district will not report the following student data to the State Ed: and there's the juvenile delinquency, criminal records, medical and health records, and student biometric. Ya know it crosses my mind here that this this might be a place where I mean this would be the place where we would put the suspension data, individual student disciplinary data. Uh we had a policy of not releasing that individual information um you might wanna have a further conversation about where people stand on that. Sorry about the dog. Someone's walking. A little old lady is walking down my street so she has to go crazy to warn us. Dave, you've been a part of these conversations, right? Where we've talked as a Board about kinda the oddness of us reporting individual students being suspended up into the state database.

**Dave Versocki:** Yeah

**Patrick McGrath:** I mean that's been kind of a long-standing thing and we actually did have the state did call us on it and ask us questions about it and we kinda sent them a summary of the the Board's position and the Board policy and how we were kinda stuck between uh the the those two things and they just dropped it and they never contacted us back again. They said well when the report comes out it's gonna it's gonna make it uh you're gonna they're all gonna count as uh absent ya know which isn't that much of a number anyway in our district but we never really we've always stood our ground on that that like ya know comparing individual students and sending it sending their data on a suspension um when it's relatively subjective from district to district why we suspend and who suspends and when things and students really don't have a lot of due process when it comes to suspensions and so we aren't we aren't um reporting delinquency records or criminal records, health records or student biometrics but why we report that a student was suspended for five days or suspended for 40 days or 30 days or something like that ya know that's kinda been the thinking on and I think the State didn't really want to pick a fight with it to be honest so they dropped it.

**Dave Versocki:** What did our legal say about it? Ya know we're not obligated to do it?

**Patrick McGrath:** Um they kinda said we see it depends on which person well actually I won't even say that because anyone that I ran it by both whether whether it be Pat Fitzgerald or whether it was Bob Van Vranken, they both were kinda like you can see it both ways and ya know the state can ask and if they are asking to send it. How is it different than any other district but ya know.

**Dave Versocki:** Well.

**Patrick McGrath:** Go ahead.

**Dave Versocki:** Ya know I mean I won't speak for any of our past Board but ya know or whatever I mean I if we're still concerned over it do we need to explicitly say it right, that's what you're getting at. Do we have a letter B here? Is that what you're really asking? We want to keep this the same and not do it.

**Patrick McGrath:** Exactly. Personally, individualized I mean I think this is exactly ya know accept if required by law ya know and we said of course we would always ya know respond to a subpoena or something that is required but as a regular basis we wouldn't report that and it's interesting because we do call out that there's four things that the Board won't report the district won't report and certainly individual external suspensions of students falls right under those same things.

**Dave Versocki:** I wonder what Jay Worona would say, he's the NYSSBA attorney ya know. Obviously, they don't have it in here. I'd love to know what his answer is but ya know does it give us the leeway just to do whatever we want and then if we get called on it and we're not really violating anything ya know if we get

**Patrick McGrath:** Yes, that's what I believe yes and I asked that that be put in and it is in the disciplinary it is in another policy on student discipline as well. So, I feel like it it's a local control state, right, I mean if the Board the question before the Board is do you want us every time a student is suspended send that information up their records to the state without any it doesn't come with any details, it doesn't come with any explanation, it doesn't come with the fact that yeah they were suspended five days for vaping where the district down the street doesn't suspend kids for vaping ya know um that's our local law or our local rule our local policy but like why should that now go on so now two kids are look and somebody's wanting to get uh appointment to a military academy or something and their looking at their records and now it's part of their records is ya know this student absent, absent, absent, external suspension, external suspension, external suspension, on their on their record. I mean to me that's as personal as it gets. I don't know I I feel comfortable making that case and I've made that case to you guys. I just think it's a little bit invasive and not necessary because the only real reason to collect it is to try to collect and we always submit aggregate stuff the problem is their moving away from aggregate collection because they can get it by drilling down to the individual kids so they don't need they don't need that vader report any more that said we suspended a total of 185 days this year all student days. So great. We've told it we're we're we're being honest and up we're just not saying who it was but now they don't need that data anymore the aggregate data because they can get it from drilling down into student records and ya know they want to compare district to district under the assumption that some school districts are suspending too much or disproportionately right of different ethnicities or something like that or socio-economic groups. So their gonna be upset if they don't know what we have what we're doing with suspension and they might surmise that we're trying to hide how much we're suspending or something but in reality it's not at all true when our suspension numbers are very low comparatively overall but it is it could be misconstrued.

**Dave Versocki:** Am I the only Board Member left on the call?

**John Blowers:** No, I'm here, too, Dave. I think we're the only two.

**Dave Versocki:** Ahh sorry.

**John Blowers:** I think were the only two that have been here the whole time.

**Patrick McGrath:** And you don't need to decide, Dave, I mean, this is this is would be something to bring to the whole Board and I want full disclosure.

**Dave Versocki:** Yeah. Ya know the truth is, John, I just didn't look, I'm sorry, I apologize. I didn't I didn't look to see if you were still on um I.

**John Blowers:** That's okay.

**Dave Versocki:** Ya know I wonder ya know if the Board collectively feels strongly that we aren't gonna share it then what's the worst that can happen? Somebody challenges us on it someday and we go okay thanks for letting us know and we gotta do it.



**Patrick McGrath:** Right.

**Dave Versocki:** I mean

**John Blowers:** Yeah I'm I'm with you, Dave, I'm in favor of lets uh lets not release what we don't have to release unless somebody comes to us and tells us we have to later then we'll release it I guess.

**Tracy Falvo:** And since the ya know the state now wants us to submit the privacy policy by July 1<sup>st</sup> it didn't say what we could or couldn't put in it. So it seems to stand that this would be the perfect place to I don't know reinforce what the Board Position is.

**John Blowers:** Mmhmm Yeah I think I think we can offer some local discretion in favor of privacy of our of our students and our community versus, ya know, whatever the alternative would be.

**Patrick McGrath:** Mmhmm. I think it's to

**John Blowers:** We've We've heard loud and clear from our community which is not a big surprise that people would like us to protect the data that we're legally able to so if we have some discretion here I'm in favor of exercising that discretion.

**Patrick McGrath:** Okay so we can talk about that with the Board, the full Board and I'll put it in bold print here.

**John Blowers:** Yup.

**Patrick McGrath:** Okay, great.

**Dave Versocki:** Dave and John said.

**Patrick McGrath:** Dave and John.

**John Blowers:** Exactly, half a quorum. Let's go.

**Patrick McGrath:** So um the district has created so number 7 The district has created and adopted a Parent's Bill of Rights which will be attached to this Exhibit 8635-E. It's linked in the policy worksheet previous to this um and it has been published on the website so the web address will be there and can be requested from the district clerk. So that's um all of the sorta the general appropriations related to EdLaw 2D and then it talks about third party contractors. The district will ensure that contracts with third-party contractors reflect that confidentiality of any student or teacher or principal PII be maintained so that this is the part that's really tricky. Uh Dave, you know this, Tracy is living this right now um that we have to have a privacy policy a contract signed with every single vendor that and it's not a small contract like the sample contract that we put we put sent over to the attorney is what is it 12 pages, Tracy? I think it was 12 pages of fine print.

**Tracy Falvo:** Yeah, I believe it is.

**Patrick McGrath:** Um so the the the vendor and this gives you just all of the things that must be in that must be in that agreement. So each third party contractor. So that's everybody from Google to uh what's what's a good one, Dave? Like a boom cards or Learning A to Z or any of them any time including

**Dave Versocki:** Overdrive

**Patrick McGrath:** What is it?

**Dave Versocki:** Overdrive, ya know, library services stuff.

**Patrick McGrath:** If you can log into it with your account, then you have to have a contract and um the the the contractor has to agree that they will follow the standard. That's a lot for some of these companies like they have to actually adopt a technologies, safeguards and practices that align with the NIST Standards. They have to comply with our data security and privacy policy. They have to limit access of our PII to only their employees they can't use it for any purpose other than explicitly authorized in the contract. They can't disclose it to anyone else ever except for authorized representatives to the extent they are carrying out the contract. They have to maintain reasonable administrative technical safeguards to protect it. They have to use encryption to protect all the PII that's in its custody and then they have to not sell, use or disclose it for any marketing purposes, facilitate its use. Contractors may release this to subcontractors engaged to perform the contracts of obligations but the subcontractor must also abide by the same data protection obligations. They signed all the small print that says this will be the case and then we publish it on our website um if they have a breach, they will promptly notify us in the most expedient way possible without unreasonable delay but no more than seven calendar days after the breach's discovery. Then this letter C gets into what third party contractors they have to have a security and privacy plan in place and that we have to review their security policies legally and approve of them so um so they have to attach their plan and we have to be able to see it and run it through legal and these are all the things that their plan has to have. It has to outline how security will be kept, has to specify safeguards and practices in place, demonstrate that it complies with all parts of EdLaw 2D, specify how people who have access will receive training, so they have to talk about their training, uh specify third party contractor will utilize sub-contractors and how it will manage that, specify how third party contractors will manage data security and privacy incidents that will implicate student PII um breaches and how they're going to notify and how and when data will be returned to the district, transitioned to a successor contract at the district's direction, deleted or destroyed by the third party when the contract expires. So all that stuff has to be in their contract and in their own internal safety plan. So that this whole section third party contractors, data security and letter B up here third-party contractors this is applies to every piece of software that we use. Dave just did an inventory of software and what's the total? like your thinking we're at, Dave? 400 or so?

**Dave Collins:** So I we inventoried the the district and self-reported we got ya know unduplicated we got about 350 pieces of software um but taking into account our existing app catalog and and usage we think it's about double that. Ya know with that's just a loose estimate but it's somewhere 500 – 700 most likely and that that that's a broad brush definitely, websites, um applications that are free applications but it could be somewhere in that range.

**Patrick McGrath:** But we obviously think that there's probably 10% maybe 20% of all that 700 titles or 500 titles or whatever we have probably compromises 80% more of the work we do. So we're focusing on getting contracts on the most important stuff and developing like a process through which individuals in the district become identified as champions we're calling them for individual software titles that are important to them and they become uh the facilitator to help Tracy gather deal with the vendor and gather the information that's necessary to get the policies in place and the contract in place so the hope is that hey if you're a technology director or I mean a tech director you work in tech um in the tech department, you use master chief architect as an ad program, you're gonna be the you're gonna be the most eager to make sure that that software's approved, right? So you're gonna be the one that's hounding the vendor and working with Tracy and running down leads and getting whatever needs to be gotten in place to get that policy that that contract signed and and sealed and delivered and paid. So that so that model we're spreading the wealth out amongst all the leaders, teacher and administrative leaders, in the district to be the ones that hey if you're one of the BTCs who's a teacher and you use Screencastify a lot and you're kinda the go to expert on Screencastify then you need to be the one that works with the vendor of Screencastify to make sure that they're going to be compliant with 2D so we're kinda spreading it out so that it doesn't seem as overwhelming to get all the subcontractors to um to sign these contracts.

**Dave Versocki:** Ahh what would it be like to have a statewide clearinghouse for all this stuff?

**(Laughter)**

**Patrick McGrath:** It was said many times, right, Trace?

**Tracy Falvo:** Right. I guess if we were if we were in Connecticut maybe.

**Dave Versocki:** I was in a meeting I won't get into the gory details but I was in a meeting last month and I just couldn't believe and these were these were people of like my of my role across the state and just the lack of understanding and like you gotta be kidding me ya know why are we doing this 660 different times.

**Patrick McGrath:** Right. Now BOCES will help us because we do purchase a lot of our stuff through BOCES so if you buy through BOCES then you guys secure the contract. You have you such a big you have such big clout cause you are buying so many licenses that the vendors are likely to say yeah I'll sign whatever I gotta sign but give me the contract.

**Dave Versocki:** Yeah and ya know but listen we think of all the different ways you can buy like our library services is one that you guys ya know go through the model schools, the instructional programs, and then there's Erie One contract across the state. All that stuff's in progress and like

you we took the highest heavy hitters and anything that doesn't have a contract uh it's not your purchasing contract it it's your data share agreement, right, that's that's what we wind up doing so not getting hung up on uh the approval of a contract by our Board from a fiscal perspective we're just dealing with it from the the privacy perspective and so it's really good actually and Michelle Jones is our attorney. She has been super and ya know what we're finding there's vendors that are like oh yeah no problem we either do it all or what's the and their willing and there's a few that take some time. I know the the hard one's gonna be Adobe. I don't know if you've dealt with that one yet or not. Did they sign yours?

**Tracy Falvo:** No, I mean we're still working on our contractual language but across thinking the that's what we're hearing that um Adobe.

**Dave Versocki:** Um yeah we are too because we use it internally so guess what? There it goes so we're all gonna be asking the same question of Adobe.

**Patrick McGrath:** Hmm

**Dave Versocki:** Yeah and so

**Patrick McGrath:** Yeah

**Dave Versocki:** It's really a good process, Patrick, and I think the more that the it's the free stuff that causes problems, right, because you don't know ya know you're not you don't ever see it as a purchase right and if it's just a click through somebody's got to stop and ask the question, right?

**Patrick McGrath:** Right.

**Dave Versocki:** Am I gonna log into this even though it's free, right and uh the answer's yeah there's some things that are like that.

**Patrick McGrath:** And we actually have a process by which Tracy and Mike um Steinberg can run reports on a monthly basis and see uh all the apps that are being accessed by that way that your talking about that are like kinda flying under the radar and we can actually investigate to see if they are one that is involving a log in or exchange of PII and then we can just blacklist those things so we will I think we're doing a lot of um a lot of training with people, a lot of uh like public relations, for lack of a better word, with teachers to say like this is coming so like we're not don't say ya didn't hear this we it's illegal and I'm also reminding them that if they're using things and student data is released on their watch using something that's going against the rules that their not allowed to be using they could, theoretically, be personally relia liable for it and not acting underneath the district's indemnification so that's enough to get some people think a little bit ya know and another nice thing about the pandemic or a nice thing about the pandemic I mean other it's forced us to like really streamline to a group of software packages that people are getting all trained on like almost every teacher now knows how to use Explain Everything, Screencastify, Google Meet um Kami ya know all the different major software packages and also a lot of them are realizing the value in like sticking with a streamlined set of

things because we're all talking the same language, we're getting training on it and so maybe post pandemic there'll be a different view of software ya know. Maybe people will see the value in like a slate of district approved software and then ya know if we want more we have a process for getting a new one on board, a pilot process. We're more than happy to do it but it's gotta be a little more than a free for all that it has become.

**Dave Versocki:** Yup

**Patrick McGrath:** So the last couple things here say training, um annual training which we've been doing for a couple of years now but now we're required it's part of our annual training it's in our slate of things that we do every year. Um got a couple good videos that are out there. We gotta get some kind of package some of this stuff up so it can be self-administered for new employees and stuff during the year but I think we're on top of the training. Uh Reporting of any breaches um that we will promptly report a any anything to Tracy and to myself and the Board. Uh then notification, the data privacy officer what was I gonna put this in will report each discovery of a breach or unauthorized release to the state's chief privacy officer without reasonable delay but no more than 10 calendar days so this is us putting putting it out there publicly um which is another good reason why we need to have policies in place for what we're gonna do when that happens if that happens. Um if it's gonna interfere with a ongoing investigation we would get some time on that. So that's so that's pretty much all the PII stuff, that's all the Ed Law 2D and that's couple the other two as I said there's the Private Information under State Technology Law. It says that uh information that would put an individual at risk for identity theft um is called private information and any breach of the district's information storage or compromises the integrity that private information um maintained by the district must be promptly reported so this is kinda what existed prior to under some other laws um and the Board directs the superintendent to establish regulations which identify the types of private information uh that to be kept secure that include procedures to identify breaches and procedures to notify persons and as soon as we pass this policy, I'll bring forward a set of regulations that talks about breaches and our policy for reporting them, our time lines and what we'll do and some sample letters and that kind of stuff and the third and final section is employee personally identifiable information for Labor law 203d um and it talks about PII again uh especially like this would be stuff we collect on employees right like a their driver's license number, their social security number um this should be in a little bit in addition the district will protect employee numbers social security numbers will not be publicly posted or displayed, visibly on any ID badge, placed in files with unrestricted access or used for licensing purposes so that's just some clean up stuff that satisfies a different one. So that is the policy 8635 that satisfies the 2D law and again if you look at um the a policy thing here under there's a there's a proposed "Parent Bill of Rights" right here and also we'll get some ARs that support uh this policy as well but those don't usually come until after we pass the policy but I can get try to start getting working on some language for that.

**Dave Versocki:** It's tough.

**Patrick McGrath:** There's one other quick thing if you scroll up to the top of the policy in the first read. I have to see if Sharon needs us to do this one. It's something about timeout rooms, physical restraint and aversives. We have a policy in place already for that. Um I'm not sure why this is on here to be honest and so I wanna just make sure I might come back and say let's open this one up as well if there's a minor thing that Sharon needs. Usually it's like a timeframe thing or something like that that needs to be there but I'm not sure why that's there. But other than that there's these five policies that we're working on right now. John, remember a

**John Blowers:** Yes.

**Patrick McGrath:** back in the common core days when everything was going on like this this is the stuff that these policies are things that everybody back then would have killed to have in place.

**John Blowers:** Yes. Exactly.

**Patrick McGrath:** Right and we had many a long Board meeting arguing about a what might or might not happen with data and in reality, they were right. I mean these laws needed to be put in place.

**John Blowers:** Right. Yeah, we were fighting on uh forefronts, standards, testing, APPR and data and this would've helped balance the equation.

**Patrick McGrath:** We tried to do it locally by by asking Tracy to take charge of this and that and that was one of our things was saying what we do. We started doing the yearly reports on data privacy and stuff so. So this one this brings it all the way home. So that is everything that I have. Exciting stuff.

**Dave Versocki:** Woo Hoo!

**John Blowers:** We made it. We get a gold star for attending, Dave.

**Patrick McGrath:** You guys I think we had a few people that at least had their computer on the whole time and got credit for this that's impressive to be sittin' through this stuff.

**John Blowers:** Yeah, that's great. These other five are getting hard to carry, Dave.

**Patrick McGrath:** Stuff we needed to do so thank you very much for your guys time tonight.

**John Blowers:** Yes. Hey do we have a, just as a looking ahead club, do we have a get together next week for anything finance or Board meeting or whatever?

**Patrick McGrath:** We do. We have a Board meeting on the 5<sup>th</sup> at 5 o'clock.

**Dave Versocki:** Did that that got moved to five?

**Patrick McGrath:** I've been moving them all up to five. I mean I I everyone was getting good feedback that that was uh easy time.

**John Blowers:** So is there still there used to be a rule that if we were ya know putting ourselves in from another location we had to disclose where we we're coming from. Is that still the case or does it matter if I'm not going to be in New York on Tuesday but I'll still be attending.

**Patrick McGrath:** I think a lot of that stuff has been suspended during this time but I think it's still a good a good disclosure sure.

**John Blowers:** Okay well you can you can put me down as broadcasting from Punta Gorda, Florida. I'm getting out of house arrest and going somewhere.

**Patrick McGrath:** Okay. You don't want to broadcast that.

**John Blowers:** Why? They could stop me

**Patrick McGrath:** I don't know. I'm not sure what the rules are about that right now.

**John Blowers:** I'm looking forward to being on the six o'clock news without confrontation.

**Patrick McGrath:** My father-in-law

**John Blowers:** I'll be I'll be at a legionnaire about about seven o'clock on Sunday if you want to if everyone has to meet me and stop me

**Patrick McGrath:** You just went public.

**John Blowers:** What's that?

**Patrick McGrath:** You just went public with that. We're on the air here so.

**Dave Versocki:** And recording.

**John Blowers:** There ya go.

**Patrick McGrath:** The authorities will meet the authorities have been notified.

**John Blowers:** See ya Sunday. I'll have my mask in hand. Alright good stuff. Thanks. This is grueling stuff but thanks for walking us through this. Very good.

**Patrick McGrath:** I appreciate you guys being here. Trace thanks for uh being here with us, too.

**Tracy Falvo:** Hey, no problem.

**John Blowers:** Yeah.

**Dave Versocki:** Alright. Thanks.

**John Blowers:** Thank you, Tracy.

**Patrick McGrath:** I'll see you out there everybody.

**Dave Collins:** Bye.

**Patrick McGrath:** Bye, Dave.

**Chris Abdo:** Have a good night.