

**State Board of Education
September 16, 2008
Item G3 (Consent Agenda)**

**DEPARTMENT OF EDUCATION
Montpelier, Vermont**

TEAM: Department-wide (Sponsored by Information Technology)

ITEM: Will the State Board of Education approve the proposed policy: Data Suppression Policy for Student Information?

<p>RECOMMENDED ACTION: That the State Board of Education approve the proposed policy: Data Suppression Policy for Student Information</p>

STATUTORY AUTHORITY: 16 V.S.A. § 164

BACKGROUND INFORMATION:

The Department suppresses all aggregate counts of confidential student information less than 11. Although this is common practice, we are concerned that the lack of a formal Board approved policy may be a security risk to the Department. We ask that the Board formally approve this policy to mitigate this risk.

COST IMPLICATIONS:

None

STAFF AVAILABLE: Lisa Gauvin; Mark Oettinger

Submitted for Vermont State Board of Education Approval

Policy Title

Data Suppression Policy for Student Information

Purpose

The purpose of this policy is to ensure the protection of confidential student information when disseminating information about our schools and students.

Scope

This policy applies to all reports which are generated by the Vermont Department of Education (hereinafter referred to as VT DOE) and/or by VT DOE's contractors and/or by third parties working on VT DOE's behalf.

Policy

VT DOE will suppress aggregate student counts of less than 11 under the following circumstances:

- counts which include sensitive information which is coupled with personally identifiable information;
- when the report will be released to an audience which includes recipients other than data owners, staff, or others who have a legal right to access data.
- Note: The disclosure of any confidential information to individuals who need that information, and who are entitled by law to receive that information, shall only be disclosed with the clear direction that its re-disclosure to anyone who is not entitled to receive that information under state and/or federal law, is prohibited.

VT DOE will also suppress aggregate student counts of confidential information when the number of students in a grouping is 100% of all students, or the number of students in a suppressed cell can be derived from existing information.

Definitions

“Personally identifiable information” is information which alone, or in combination with other information, is linked, or is linkable, to a specific student, and which would thereby allow a reasonable person in the school or its community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty.

“Sensitive information” is any information which is protected under federal and/or state statute.

“Confidential information” is any information which is both “sensitive information” and “personally identifiable information.”

Classification of Information

The VT DOE's Information Technology Team will be responsible for classifying data as “personally identifiable information” and/or “sensitive information” and/or “confidential information.”