Safely Using Online Digital Tools (ODTs)
General Use Guidelines on Data Privacy with Online Digital Tools

MCPS Data Privacy Website   ODT Approval Form
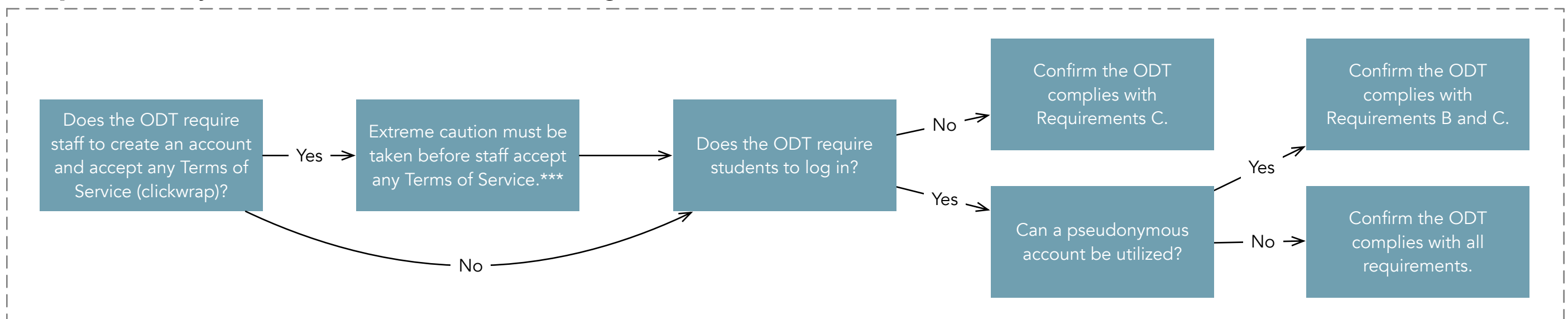
Introduction and Objective

As educators, our first responsibility is to keep students safe. In today's digital age, this includes taking steps to protect and secure students' data when using **online digital tools** (**ODTs**) such as websites and apps for educational purposes. Montgomery County Public Schools (MCPS) is committed to supporting staff by providing established guidelines to aid in the selection of instructional technology to be used by students. While school-wide or district-wide adoption of an ODT requires a MCPS-vetted data sharing agreement with the vendor, these Guidelines promote responsible use of technology in classrooms pending MCPS approval of an ODT. In addition to following the guidelines outlined below, MCPS staff must also comply with all applicable MCPS requirements for review of curricular and instructional materials, as well as federal and state laws and MCPS Regulation IGT-RA, *User Responsibilities for Computer Systems, Electronic Information, and Network Security.*
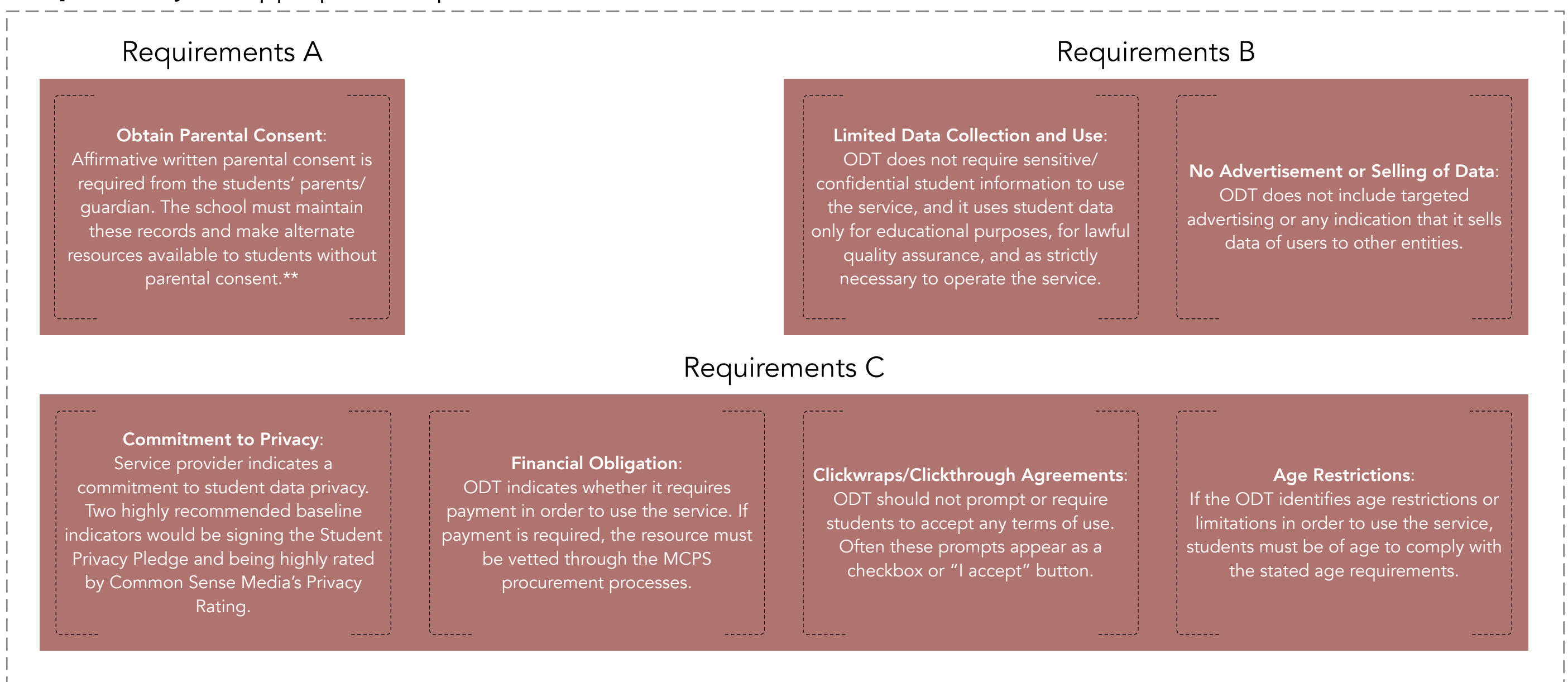
Key Steps to Remember

Before proceeding with an online digital tool, **always**:

- Visit the MCPS Data Privacy website to see if the tool has already been vetted. If it has not been vetted, you should consider the guidance that follows, obtain approval from your principal or supervisor, and submit a request on the ODT Approval Form before proceeding. A link to the ODT Approval Form is on the top of this document.

- Print, review, and save the tool's *Privacy Policy* and *Terms of Service/Terms of Use*. Keep your copy of the ODT's *Privacy Policy* and *Terms of Service/ Terms of Use* somewhere safe.

- Consider whether the tool provides features that are comparable to tools that have already been approved. If not, consider whether evidence-based evaluations exist that support the value added by this tool.

Step 1: Identify how users access the online digital tool

Step 2: Verify the appropriate requirements based off the workflow above

Requirements A

Obtain Parental Consent:
Affirmative written parental consent is required from the students' parents/ guardian. The school must maintain these records and make alternate resources available to students without parental consent.**

Requirements B

Limited Data Collection and Use:
ODT does not require sensitive/ confidential student information to use the service, and it uses student data only for educational purposes, for lawful quality assurance, and as strictly necessary to operate the service.

No Advertisement or Selling of Data:
ODT does not include targeted advertising or any indication that it sells data of users to other entities.

Requirements C

Commitment to Privacy:
Service provider indicates a commitment to student data privacy. Two highly recommended baseline indicators would be signing the Student Privacy Pledge and being highly rated by Common Sense Media's Privacy Rating.

Financial Obligation:
ODT indicates whether it requires payment in order to use the service. If payment is required, the resource must be vetted through the MCPS procurement processes.

Clickwraps/Clickthrough Agreements:
ODT should not prompt or require students to accept any terms of use. Often these prompts appear as a checkbox or "I accept" button.

Age Restrictions:
If the ODT identifies age restrictions or limitations in order to use the service, students must be of age to comply with the stated age requirements.