

CRPC (CT Parental Rights Coalition)
CTParentalRightsCoalition@gmail.com
[Testimony in Opposition to HB 7207](#)

March 5, 2017

Greetings Representative Fleishmann, Senator Slossberg, Senator Boucher and respected members of the CT Education Committee,

We are writing to you today on behalf of Connecticut's Parent Rights Coalition (CPRC). CPRC is the union of 11 citizen groups throughout CT, representing approximately 40,000 CT residents. The Coalition has worked with legislators by submitting research, evidence and expert counsel. We are committed to the safety of children and the rights of parents.

CPRC is in opposition to [HB-7207 AN ACT MAKING REVISIONS TO THE STUDENT DATA PRIVACY ACT OF 2016.](#)

Our overarching position is that data should not be collected without prior consent from the data owners. In the case of students attending our Public Schools, consent for the child should come from the parent or legal guardian. This position has not changed since the Student Data Privacy Act was enacted. Our position and that of your constituents has been well documented through media coverage. (see links at the bottom of this testimony for examples) The SDP law does not achieve informed consent, and we continue to urge you to include informed consent in this, or any other appropriate bill. We recognize, however, that the existing SDP law *does* offer transparency and puts much needed safeguards in place for some student data. These safeguards would be delayed by HB 7207 resulting in increased susceptibility and potential harm to CT children. Therefore, we oppose HB 7207 and implore you to 'kill the bill'.

A colleague from within the CPRC had the opportunity to meet with a member of CT Commission on Educational Technology (CT CET), this January. We feel the commission has done a great job making the Student Data Privacy law operational. Having the field expertise and

having laid the ground work for implementation, we refer to CT CET's recommendations, status of implementation and outstanding needs below and also at

<http://www.sde.ct.gov/sde/lib/sde/pdf/evalresearch/studentdataprivacyv2.pdf>

It is CT Commission on Educational Technology's opinion that a delay is NOT necessary or helpful for these reasons:

1) This is good policy that should have been in place long ago. The state and the districts should have been taking these steps all along. We need to complete this initial implementation phase and the work load will level out.

2) The new system is being built and will be running for districts within a few months -before the session ends

3) This law is the impetus for districts to take account of what they were using. Districts have found redundancies and extra expenses that may not be necessary. Example: we have 17 math apps. Are they all necessary and should we be paying for all 17?

4) A delay is not helpful for it could cause districts to cease working on implementation and allow for bad habits and inefficiencies to continue at a time when everyone is looking for greater efficiency.

5) There is no punishment in the law as long as districts can show due diligence of implementation.

The CT Commission on Educational Technology is in the process of:

1) Working with DAS on the larger agreements so that all districts could work off of state level agreements (powerschool, google, apple, etc)

2) Building a state level inventory of approved apps and websites that districts can work-off of thereby avoiding going through the agreement process by themselves. Teachers would have a working resource bank of vetted tools to choose from.

3) Creating a work flow protocol for in-district approvals of anything not on the state list (page 9)

4) Providing a list of Advantages for districts of this process (page 10)

The fact is that we have a systemic federal violation situation and we need to take account of practices that have ensued. The CT Commission on Educational Technology has undertaken a large part of the work to correct this. The Commission feels that training is needed. We agree, and those closest to the SDP work have said that from the start. The task force is needed for the ongoing conversation on other topics and to have all stakeholders communicating and collaborating going forward. In short, no delay is needed and most of this will be done before the session ends. The outstanding need is a task force and training.

If so much has been done and if the required protections for students are undeniably needed, why then has HB 7207 made it here? It is our concern that such a bill reflects misaligned priorities including perhaps among some legislative members. Is the safety of our CT children not paramount? Delay of the Student Data Privacy Act is not only irresponsible but indicative of the legislature's priorities as they relate to the children of this State. **CPRC stands in opposition to HB 7207 and implores you to 'kill the bill'.**

Thank you,

CT Parent Rights Coalition

Examples of media coverage on this issue:

National pick ups of HB 7207

Diane Ravitch

<https://dianeravitch.net/2017/03/05/urgent-message-to-parents-in-connecticut-your-childs-privacy-at-risk/>

National Coalition for Student Privacy

<https://www.studentprivacymatters.org/alert-ct-parents-your-state-legislators-are-trying-to-weaken-your-childrens-privacy-protections/>

Missouri Education Watchdog

<http://missourieducationwatchdog.com/connecticut-legislators-dont-want-to-protect-students-after-all-trying-to-repeal-student-data-privacy-law-again/>

Student Data Privacy 2016

Connecticut governor signs student privacy act into law

<https://www.dataprivacyandsecurityinsider.com/2016/06/connecticut-governor-signs-student-privacy-act-into-law/>

Wilton's State Rep. Lavielle Applauds Landmark Bill to Protect Student Data Privacy

<http://patch.com/connecticut/wilton/wiltons-state-rep-lavielle-applauds-bill-protect-student-data-privacy-signed-law>

Fairfield's McCarthy Vahey Applauds Student Privacy Bill

<http://fairfield.dailyvoice.com/politics/fairfields-mccarthy-vahey-applauds-student-privacy-bill/658172/>

Data sweep: Schools preparing for student privacy law set to go into effect Oct. 1

<http://www.theridgefieldpress.com/71433/data-sweep-schools-preparing-for-student-privacy-law-set-to-go-into-effect-oct-1/>

Legislation will protect student data privacy

<http://www.eastoncourier.com/41763/legislation-will-protect-student-data-privacy/>

New state law protects student data

<http://www.newcanaannews.com/news/article/Where-does-the-data-go-New-Canaan-moms-work-to-9123115.php>

Local women aid student data privacy legislation

<http://ncadvertiser.com/81627/local-women-aid-student-data-privacy-legislation/>

Use of Connecticut student data brings both potential rewards and risks

<http://ctviewpoints.org/2016/03/11/use-of-connecticut-student-data-brings-both-potential-rewards-and-risks/>

Connecticut schools need comprehensive protection of student data privacy

<http://ctviewpoints.org/2015/04/27/connecticut-schools-need-comprehensive-protection-of-student-data-privacy/>