

# NWEA Privacy and Security Policy for Student Information

Northwest Evaluation Association (“NWEA”) honors the privacy of student information and recognizes the importance of protecting such sensitive information. NWEA strives to treat personally identifiable student data (“Personal Student Data”) according to applicable local laws that regulate securing the access, maintenance, and transfer of Personal Student Data. This Privacy Policy (“Policy”) describes the types of student information we receive from our subscribers of our products and services and may collect from students taking NWEA’s assessments and our practices for collecting, using, maintaining, protecting and disclosing that information.

## Personal Student Data Collected from Subscribers

In order to perform the services pursuant to an agreement, our subscribers provide and we collect information which varies with the activity but which typically includes items such as the following:

- Full Name
- Date of Birth
- Student Identification Number Assigned by Subscriber
- Assigned Classroom Teacher
- Classification Data (which may, but does not always, include race, ethnicity, gender, nationality, free/reduced lunch)
- Disability Status for accommodation

## Personal Student Data Collected from Students

As a result of students taking NWEA’s assessments, we collect the following information associated with each student:

- RIT scores used in system reports for subscribers
- Student Item Responses
- Growth projections

## Use and Disclosure of Personal Student Data

As a vendor to subscribing schools and districts, NWEA is subject to its subscribers’ privacy and security policies with regards to maintaining and transferring Personal Student Data. We are a research educational not-for-profit with a mission to partner with others to help all kids learn. We use Personal Student Data to perform services under our agreements with our subscribers and to fulfill our mission and do not repurpose Personal Student Data for sale to third parties for their commercial use. For example, we:

- Use Personal Student Data to create, generate, and deliver reports to our subscribers including custom reports as requested. In addition, we may use Personal Student Data, with subscribers’

written permission, for statistical studies and research by us or third parties to benefit our subscribers (e.g., virtual comparison group studies, linking and alignment studies)

- Subject to applicable law and under a separate permission agreement by our subscribers, we may share and transfer Personal Student Data to third parties to evaluate educational or research programs or to conduct research studies.
- Generate aggregate data, which does not identify students in particular but tends to reflect collective information about students (see below for Non-personal Student Data).
- Deal with legal processes such as subpoenas, claims of test security breach.

## **Non-Personal Student Data Collected**

We collect and use some information from NWEA's assessments in aggregate form so that it cannot be manipulated to identify any particular individual user.

- Assessment response times
- Item response times
- Assessment behavior such as completed, paused, suspended and terminated tests

## **Use and Disclosure of Non-Personal Student Data**

As an educational research organization and as part of providing services to its subscribers, we use Non-Personal Student Data to:

- Conduct research and produce aggregate statistical studies and analysis related to our products and services by us or third parties as an added benefit our subscribers (e.g. Norming studies)
- To improve our products and services and our business systems and procedures, from time to time.

## **Retention of Data**

We retain Personal Student Data for the length of time necessary to meet our contractual and legal commitments to our subscribers. Most of the time, these commitments extend past the end date of our agreements since our subscribers may need continued access to Personal Student Data as evidence of educational data for reporting and many subscribers resume their subscriptions at a later date and want their historical Personal Student Data intact for longitudinal growth studies or for legal compliance. However, we honor subscribers' requests to destroy data from our production systems upon written request.

Our customary practice is to retain Non-Personal Student Data indefinitely for the purposes stated above in "Use and Disclosure of Non-Personal Student Data" to further our mission.

## **Security of Data**

We have established technological, internal policies and practices and appropriate safeguards to help prevent unauthorized access to or misuse of Personal Student Data. To protect confidentiality, we employ policies and procedures around segregation of duties and personnel management to ensure Personal Student Data and other sensitive data remains secure. This includes practices around recruiting and hiring involving security clearance and background checks. All employees complete orientation and training regarding appropriate use of communications and software systems and

foundational information security policies. NWEA audits these controls regarding access, confidentiality and integrity yearly via an SSAE 16 audit, done by an outside independent auditing firm. We also endeavor to require our service providers and other contractors to provide similar protection appropriate for the nature of the data handled by the providers.

NWEA uses industry standard methods such as SSL (secure socket layer) or encrypted file transfer techniques to secure and protect Personal Student Data and other confidential information. A multi-layered security approach protects data in storage. Internal access to confidential or sensitive data is limited to those with a need to know and who have executed a confidentiality and non-disclosure agreement. Our test delivery applications provide security and role based access at various levels of entry, analysis, and reporting. Access to the assessment system and the reports website are made available by using passwords that our subscribers define and keep secure. These passwords help us verify the subscriber's identity before granting access or making corrections to any information. As such, subscribers should never disclose their passwords to anyone. Our subscribers are responsible for maintaining the secrecy of their passwords and any information reported to them by us.

More detailed information about our Privacy and Security practices, see the document Web-Based MAP Security Specifications.

### **Data Breach Notifications**

In the event of a security breach of Personal Student Information or other confidential information of our subscribers, we notify affected subscribers as soon as practicable in accordance with applicable laws. We have an Information Security Team that will monitor the recovery and repair of the technical or process vulnerability.

### **Contact Information**

For additional information or concerns, please contact NWEA at [Audit-Risk@nwea.org](mailto:Audit-Risk@nwea.org)

This Policy was last updated September 24, 2014.