



## Student Data Collection and Privacy Policy

### Policy Number: 7302

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#### I. Policy

Summit Academy and Summit Academy High School collects necessary student data to conduct the regular activities of the school. The school(s) may also collect student data with written consent from the student's parent or from a student who has turned 18 years of age.

##### A. Necessary Student Data

- Student Name, Date of birth, and Sex
- Parent and student contact information and Custodial parent information
- A student identification number (including the student's school ID number and the state-assigned student identifier, or SSID)
- Local, state, and national assessment results or an exception from taking a local, state, or national assessment (click [here](#) for more information on assessments)
- Courses taken and completed, credits earned, and other transcript information
- Course grades and grade point average
- Grade level and expected graduation date or graduation cohort
- Degree, diploma, credential attainment, and other school information
- Attendance and mobility
- Drop-out data
- Immunization record or an exception from an immunization record
- Race, Ethnicity, or Tribal affiliation
- Remediation efforts
- An exception from a vision screening required under **Utah Code Section 53G-9-404** or information collected from a vision screening described in Utah Code Section 53G-9-404
- Information related to the Utah Registry of Autism and Development Disabilities (URADD), described in **Utah Code Section 26-7-4**
- Student injury information
- A disciplinary record created and maintained as described in **Utah Code Section 53E-9-306**
- Juvenile delinquency records
- English language learner status
- Child find and special education evaluation data related to initiation of an IEP



## **B. Optional Student Data**

- Information related to an IEP or needed to provide special needs services
- Biometric information used to identify the student
- Information required for a student to participate in an optional federal or state program (e.g., information related to applying for free or reduced lunch)

Certain sensitive information on students collected via a psychological or psychiatric examination, test, or treatment, or any survey, analysis, or evaluation will only be collected with parental consent. The parents/guardians will receive a separate consent form in these cases. See Summit Academy's Protection of Pupil Rights Act (PPRA) notice for more information.

## **C. Prohibited Collections**

Summit Academy will not collect a student's social security number or criminal record, except as required by **Utah Code Section 78A-6-112(3)**.

## **D. Data Sharing**

Summit Academy will only share student data in accordance with the Family Educational Rights and Privacy Act (FERPA), which generally requires written parental consent before sharing student data. FERPA includes several exceptions to this rule, where Summit Academy may share student data without parental consent. For more information on third parties receiving student information from us, see Summit Academy's Metadata Dictionary.

Student data will be shared with the Utah State Board of Education via the Utah Transcript and Records Exchange (UTREx). For more information about UTREx and how it is used, please visit the Utah State Board of Education's Information Technology [website](#).

## **E. Benefits, Risks, and Parent Choices**

The collection, use, and sharing of student data has both benefits and risks. Parents and students should learn about these benefits and risks and make choices regarding student data accordingly. Parents are given the following choices regarding student data:

- Choice to **request to review** education records of their children and request an explanation or interpretation of the records (see Summit Academy's annual FERPA notice for more information)
- Choice to **contest the accuracy** of certain records (see Summit Academy's annual FERPA notice for more information), potentially leading to the correction, expungement, or deletion of the record



- Choice to **opt into certain data collections** (see the section above on optional data collections)
- Choice to **opt out of certain data exchanges**
  - Information that has been classified as directory information (see Summit Academy’s directory information notice for more information)
  - Parents of students with an IEP may have their information shared with the Utah Registry of Autism and Developmental Disabilities (URADD). If included in this data exchange, parents will receive a separate notice within 30 days of the exchange, informing them of their right to opt out, per **Utah Code Section 53E-9-308(6)(b)**
- Choice to **file a complaint** if parents/guardians believe the school or its agents are violating their rights under FERPA or Utah’s Student Data Protection Act. If parents/guardians have a complaint or concern, Summit Academy recommends contacting Summit Academy’s Data Security Officer at 801-572-9007 and then escalating to the state and US Department of Education if needed.

#### **F. Storage and Security**

In accordance with **Board Rule R277-487-3(14)**, Summit Academy has adopted a cybersecurity framework called the CIS Controls.

## **II. References**

Utah Code Section 53G-9-404  
Utah Code Section 26-7-4  
Utah Code Section 53E-9-306  
Utah Code Section 78A-6-112(3)  
Utah Code Section 53E-9-308(6)(b)  
Utah Admin Code R277-487-3(14)

## **III. Attachments**

N/A

## **IV. Revision History and Approval Date**

Version 1: January 16, 2020: Original date of approval  
Version 2: October 27, 2022: Reviewed with no changes