

School Board Media Use Policy and COPPA Law “Cheat Sheet”

(The following only apply to students under the age of 13)

COPPA Law: What is Personal Information? ([https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions#General Questions](https://www.ftc.gov/tips-advice/business-center/guidance/complying-coppa-frequently-asked-questions#General%20Questions))

The amended Rule defines personal information to include:

- *First and last name;*
- *A home or other physical address including street name and name of a city or town;*
- *Online contact information;*
- *A screen or user name that functions as online contact information;*
- *A telephone number;*
- *A social security number;*
- *A persistent identifier that can be used to recognize a user over time and across different websites or online services;*
- *A photograph, video, or audio file, where such file contains a child’s image or voice;*
- *Geolocation information sufficient to identify street name and name of a city or town; or*
- *Information concerning the child or the parents of that child that the operator collects online from the child and combines with an identifier described above.*

What is Acceptable and Unacceptable?

- A student’s first and last name cannot appear together in any *electronic* publication.
 - If a name is going to be electronically published, it should only be the first name of the student (ie: daily announcements, newsletters, podcasts, tutorials, videos, PowerPoints, projects, honors, contests, etc.)
 - **Acceptable:** Caption/School Highlight/Article (*with no photo* included) that says, “Billy was selected as the winner of this year’s Science Expo.”
 - **Unacceptable:** Caption/School Highlight/Article (*with no photo* included) that says, “Billy Smith was selected as the winner of this year’s Science Expo.” (Unacceptable because the student’s first *and* last name are associated together.)
- No student will have a photograph, video, and/or audio file *electronically* published **without written consent** from his/her parent/guardian via the *Annual Media Consent Form for Photographs, Videos, and/or Audio Files of Students: Code No. 804.6E2*.
 - Web pages, Facebook, Twitter, text message, cell phone photos, email, etc.
 - **Unacceptable:** A teacher takes a cell phone photo of his/her students doing an activity. A student in the photo does not have a returned consent form giving consent to appear in electronically published photos. The teacher sends the photo to a teacher/secretary/webmaster, etc.
- A student’s name cannot be associated with a photo where the student is included.
 - A student’s name cannot be identified with a photo (ie: daily announcements, newsletters, tutorials, videos, PowerPoints, projects, honors, contests, etc.)
 - **Acceptable:** Caption/School Highlight/Article (*with photo* included) that says, “Congratulations to the winner of this year’s Science Expo.”
 - **Unacceptable:** Caption/School Highlight/Article (*with photo* of student included) that says, “Billy was selected as the winner of this year’s

Science Expo.” (Unacceptable because the student’s first name *and* a photo of the student are associated together.)

- **Unacceptable:** A student is holding a certificate that has his/her name printed on it.
 - **Unacceptable:** A student is sitting at his/her desk and his/her name is visible on the desk (ie: name card, name banner, or name written on a sticker).
 - **Unacceptable:** A student appears in a photo with his/her name displayed on the shirt.
 - **Unacceptable:** A photo is taken in a classroom and student names appear in the background of the photo. (ie: on the whiteboard, bulletin board, etc.)
 - **Unacceptable:** Taking a photo of student rosters and posting on Facebook, Twitter, Website, etc.
 - **Unacceptable:** A parent/visitor brings any child under the age of 13, that child cannot appear in an *electronically* published photo without parent/guardian permission.
- A student’s name cannot be associated with an audio/video file.
 - A student’s name cannot be identified with an audio/video file (ie: daily announcements, tutorials, podcasts, videos, PowerPoints, projects, honors, contests, etc.) that is *electronically* published (*YouTube, SchoolTube, podcast, etc.*).
 - **Acceptable:** Podcast/Video/Online Presentation Tutorial that includes student’s narration, “Welcome to this week’s announcements.” “This tutorial is brought to you from DMIS.” (Acceptable because the student’s name who is presenting is not mentioned.)
 - **Unacceptable:** Podcast/Video/Online Presentation Tutorial that includes student’s narration, “This is Billy, welcome to this week’s announcements.” “This tutorial/presentation is created by Billy.” (Unacceptable because the student’s name who is presenting is mentioned.)
- Class photos identified with a teacher
 - As long as all students in the class have parent/guardian consent via the *Annual Media Consent Form for Photographs, Videos, and/or Audio Files of Students: Code No. 804.6E2*, the class photo (no names included) may be electronically published.
 - A K-12 special needs student’s identity **cannot be associated with a special needs teacher** without written consent per event via the *Media Consent Form for Photographs, Videos, and/or Audio Files of Students: Code No. 804.6E1*.
- Any online vendor (defined as 3rd party vendor) that uses student information based on the definitions provided in COPPA Law Personal Information, must be approved by the Western Dubuque Technology Committee and/or Director of Instructional Technology and/or Curriculum Director before it can be used with students. (Google Drive, Edmodo, Socrative, etc.)
 - Form available at SchoolStream (*Third Party Vendor Use form*)