Process for Using "Free" Programs with Students that Require Student Information or Logins

With the focus on cyber-security and keeping both our network and our users' information secure, the process below will need to be followed before using a "free" program not provided by St. Clair County Schools. *This includes programs shared at trainings or searched for in Clever and any "free" program that requires a Microsoft Login or any student information--including student name or email.)* Clever is simply a portal to allow students to log in easily to access programs that require a Clever login. Not all programs in Clever have been vetted for the safety and security of our students. Our students' online safety is paramount in today's digital age. **Before creating ANY student accounts with student names, emails, etc. (including logging in through Microsoft or Clever), please follow the process below.**

1. Is there a program that SCCS provides or has already been approved that will meet the same need? If yes, then please use that program. If you are not sure, please email Shelley McCoy or Brandy Hyatt with the name and website address of the program you are wanting to use and explain what it does. If there is nothing similar, please continue with the next step.
2. Check the site's Privacy Policy (Sometimes there is a policy link specific to students or COPPA.)
   a. Go to the homepage of the main website. (Example: www.formative.com)
   b. Scroll down to the very bottom and click on the Privacy Policy link. Sometimes there is a specific link for educators or students, but usually it will just say, "Privacy Policy"
   c. Scroll through the read carefully.
   d. Things to look for that are required for approval by SCCS:
      1. The site DOES NOT sell data or allow third parties to use data.
      2. Student information is NOT gathered or stored. (This includes names and email addresses)
      3. Look for acronyms like FERPA, COPPA, CIPPA and read about them. Do they adhere to these laws?
      4. If you teach students aged 13 or younger, are you required to get parental permission in writing before creating accounts?
      5. If the Privacy Policy can be updated, will you be notified and required to review the policy?
3. If the program meets the criteria listed in 1.d., please share the program with your administrator(s) and how you intend to use it with your students.
4. If your administrator(s) have approved the use of the program/site, please put in a tech ticket with the homepage web address, the Privacy Policy web address, and the following information:
   a. The name of the Program.
   b. Detailed information about how it will be used with students.
   c. How will accounts be created? (Teacher created (manual input or join code), Microsoft Login available, Clever login, etc.)
   d. What age students will be using this program?
   e. Refer to the list in 1. d. Copy and paste evidence from the privacy policy that address the requirements.