

CTECS Online Privacy Policy



The Career and Technical Education Consortium of States (CTECS) Privacy Policy Pertaining to Student Data Collection and Sharing

At the Career and Technical Education Consortium of States, Inc. (“CTECS,” “**We**,” “**Our**,” or “**Us**”), we respect and protect the privacy of our users (“**You**” or “**Your**”). The purpose of this Privacy Policy (“**Policy**”) is to make transparent to you the following:

- what data we collect for the purpose of curricular instruction and testing AND how we collect it;
- how we use the data we collect;
- and finally, how we share AND protect personally identifiable information (PII) within the education testing environment involving students. (PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context).

CTECS boasts a forty-year history of operating a consortium of states for which members pool efforts to develop competency-based career and technical education resources that are validated by business, industry, and labor. CTECS works to find connections between partners and members of our consortium and encourages the exchange of knowledge and resources collaboratively. CTECS successfully facilitates a complete occupational analysis system whereby data is collected from incumbent workers for the specified occupational area. This creates a vast repository of assessment and training tools that are readily available to new community members. But our true competitive advantage is established by our ability to customize assessments and services to meet individual member and partner needs.

Mission

CTECS provides industry-based resources and services for the improvement of career technical education and workforce development instruction, assessment, certification, and delivery.

Vision

CTECS strives to close the gap between education, workforce development, and actual careers by becoming the premier provider of high-quality, industry-based resources.

CTECS Clients

CTECS clients who use our online products and test system are educational sites such as schools, departments of education, and various educational entities who promote adult learning. CTECS interacts directly with teachers, administrators, government officials and other educational and business partners. CTECS does not directly interact with children or students in any way.

This privacy policy is divided into two sections.

Section A: Children at the Middle School Level. It covers all privacy policies centered on children under the age of 13. Specifically, CTECS offers an online career exploration course dedicated to middle school students, grades 6-8.

Section B: High School and Adult Education Students. In this section, the focus is on high school and adult education students who use our online curriculum and shared-partner's test system to receive online assessments. Learn more about our legal partner, Pitsco Education, and view their Privacy Policy, which directly corresponds to CTECS Section B privacy policy, by reading here: <https://www.pitsco.com/Privacy>.

Section A: Children at the Middle School Level

What Data We Collect and How We Collect It

We collect only the information necessary for teachers, counselors, and middle school staff to use our online Middle School Curriculum, which is also referred to as middle school course, such as a username, password, and any information submitted. CTECS recommends that a parent or authorized school official provide permission for the creation of an account for any student under 13. CTECS asks that each school or institution notify parents of their use of third-party services. CTECS abides by the Children's Online Privacy Protection Act, alternatively known as COPPA, which requires parental consent from the sponsoring educational entity for authorization to collect information from children under the age of 13. Under COPPA, all accounts for children under the age of 13 (or a higher age as might be required by local laws) must be authorized by a parent or other authorized school official. However, ultimately the legal discretion is placed on the sponsoring educational entity.

It is important to note that the use of our online middle school curriculum does not permit account registration directly by the student.

When children use our online middle school course, they are providing the following types of data through our middle school online course, which is completely teacher-controlled:

- **Student Account Information.** Entry of usernames, passwords, and similar security information to access the middle school course.

- **Corresponding Personal Information.** When needed through teacher guidance to grade and provide formative feedback, children may be asked to enter a first name, last name, and grade level.
- **Student Submissions.** Our online course asks children to respond to multiple-choice questions, type responses into open text fields, take pre-assessments and post-assessments, complete quizzes, and record the date and/or time a process or assignment was completed. These responses may include personally identifiable information. When a child submits such information, this information can only be viewed by the child, other student teams who were partnered for a shared assignment or experience, and authorized educators or supervisors.

How we Use Data at the Middle School Level

When children use our online middle school course, they are providing data used by teachers to instruct and assess their *educational experiences*:

- **Use of Online Curriculum.** Children provide information that allows them access to and use of the CTECS online middle school course.
- **Individualized Experiences.** Children provide information that customizes the middle school student's experience through assignments, projects, quizzes, and assessments that may be specific to each child.
- **Educational Purposes.** We may use information and feedback provided by children to aggregate our vision and mission or achieve specific program improvement goals such as data analysis, developing new or improved products and services, identifying usage trends, and evaluating the effectiveness of our course content and overall course design and functionality.
- **Instructor and Curricular Validity.** Collected information may be used to allow teachers and educators to track progress, completion, and performance as valued feedback to evaluate and improve instruction, technology, and course effectiveness.

How we Share Data at the Middle School Level

In the event CTECS is asked to share information provided by children, and/or is required to do so, all data is appropriately anonymized or aggregated to disallow personal identification of a student, or when a consenting parent or school official requests such data sharing.

No collected data is shared with other companies, organizations, or individuals except if the following occurs:

- **Authorized Consent Requests.** CTECS may need to disclose children's personal information when a school official or parent provides written consent.
- **School Staff Access.** School or district administrators can access stored data within that school or district's account. Instructing teachers of the course have access to student information housed within their classes.

- **Legal Compliance.** If CTECS is legally required to reveal student data in order to comply with pertinent laws, governmental hearings, judicial proceedings, court orders, or litigation processes.
- **Educational Partners.** If a partner of CTECS requests the sharing of student data for the purposes of the betterment of CTECS and its partners, we may do so when deemed appropriate and beneficial under the jurisdiction of this privacy policy.

How we Protect Data at the Middle School Level

We protect children's PII through a secure online learning management system that uses the most stable and newest technical security measures.

CTECS system-wide security infrastructure uses the most up-to-date technology to protect the security of any personal information we process. Having said this, please also remember that we cannot 100% guarantee that the Internet itself is fully secure or that the user's Internet is 100% safe. While CTECS has taken every measure to protect personal information, transmission of personal information at the middle school level is at your own risk. You should access the course only within a secure environment.

We will store personal information indefinitely for the purposes set out in this privacy policy, unless a written request to remove data is provided by the education site or consenting parent.

Section B: High School and Adult Education Students

What Student Data We Collect and How We Collect It

When students use our online testing system, they receive a test voucher that requires them to enter their name and automated unique password.

CTECS may collect the following information from students when testing with us:

- **Student Login Information.** We may collect personal student data to include but not limited to a first and last name, username, password, and class information (class name, period name, grade level, and so on) as provided by a test site administrator, teacher or other school official. Our test system does not allow account registration to be completed directly by the student.
- **Student Test Responses.** CTECS test system does authorize students to answer multiple-choice questions, type responses into open text fields, and record the date and/or time a process/project or assignment was completed. Responses as such may include PII.

- **Student Curricular Experiences.** When students use our online resources to aid them in their learning, information is automatically collected as it is with any website navigation. This automatic information does not expose PPI but may include the computer and mobile device usage information such as IP address and browser type, as common examples. Device tracking is automatically collected using cookies, web beacons and other data technologies to receive and store certain types of information through your interaction.
- **Recorded Content** Our testing options includes automated remote testing, which occurs outside of the in-school classroom. As such, it uses technology to record a video and audio recording to protect the integrity of the tests and allow for remote test proctoring. By participating in this examination, students are made aware through the test site administrator that they are giving consent to the video recording. Each student is representing and agreeing that he/she is over the age of 13. These consent statements are incorporated into the honor code that each student must read and agree to before starting the virtual test. For more information on how the information is recorded and stored, please visit proview.io. Their privacy policy is available [here](#).

How We Use Student Data

When students test with CTECS or use our online resources, they are providing data used by teachers to instruct and assess their educational experiences:

- **Assessment Data: Testing results are used in various ways by our customers. Pre-testing data may be used to improved curriculum validity and classroom instruction. Post-test data may be used for federal, state, or local accountability purposes. All data is used to improve the program of study, school, teacher, curriculum, and for student growth.**
- **Individualized Experiences:** Students provide information that customizes their educational experience through assignments, projects, quizzes, and assessments that may be specific to each learner. All of these experiences are defined as life-long learning experiences.
- **Educational Purposes:** We may use information and feedback provided by students to aggregate our vision and mission or achieve specific program improvement goals such as data analysis, developing new or improved products and services, identifying usage trends, and evaluating the effectiveness of our assessment content and overall curriculum resources.
- **Instructor and Curricular Validity:** Collected information may be used to allow teachers and educators to track progress, completion, and performance as valued feedback to evaluate and improve instruction, technology, and assessments and resources.

How We Share Information We Collect from Students

In the event CTECS is asked to share information provided by high school or adult education students, and/or is required to do so, all data is appropriately anonymized or aggregated to disallow personal identification of a student, or when a consenting parent or school official requests such data sharing.

No collected data is shared with other companies, organizations, or individuals except if the following occurs:

- **Authorized Consent Requests.** CTECS may need to disclose personal information when a school official or parent provides written consent.
- **School Staff Access.** School or district administrators can access stored data within that school or district's account. Instructing teachers have access to student information housed within their classes.
- **Legal Compliance.** If CTECS is legally required to reveal student data in order to comply with pertinent laws, governmental hearings, judicial proceedings, court orders, or litigation processes.
- **Educational Partners.** If a partner of CTECS requests the sharing of student data for the purposes of the betterment of CTECS and its partners, we may do so when deemed appropriate and beneficial under the jurisdiction of this privacy policy.

How We Protect Information We Collect from Students

We protect a student's PII through a secure online learning management system that uses the most stable and newest technical security measures.

CTECS system-wide security infrastructure uses the most up-to-date technology to protect the security of any personal information we process. The online test system is built with the utmost technology to protect student data. Having said this, please also remember that we cannot 100% guarantee that the Internet itself is fully secure or that the user's Internet is 100% safe. While CTECS has taken every measure to protect personal information, transmission of personal information is taken at your own risk. You should access the course only within a secure IT environment.

We will store personal information indefinitely for the purposes set out in this privacy policy, unless a written request to remove data is provided by the education site or consenting parent.

The Rights of Parents and Guardians

CTECS operates all testing and student data processes in compliance with the Federal Education Rights and Privacy Act ("FERPA"). Under FERPA, parents and/or guardians are entitled to access to their students' information. When parents of students who access CTECS services and products request access to or deletion of their child's personal

information, they must contact the sponsoring educational institution. CTECS will uphold these requests under the legal parameters of FERPA, the school, and the student of the parent or legal guardian.

Parental Consent

CTECS agrees to the sponsoring educational institution's creation of accounts and use of our educational services as permission to collect information from students and children who may be below the age of 13 (or a higher age as may be required by local laws) and to access our services, as defined in the parameters of COPA. Because our services may integrate or link to other sites or services, such as Technology Fluency Institute (techfluency.org/esess), LockDown Browser (web.respondus.com/he/lockdownbrowser), and Proview (proview.io), or other similar websites, it is the responsibility of schools to obtain parental consent for students to use these associated services as well.

It is advisable that all schools reveal full disclosure to students, parents, and/or guardians regarding their use of CTECS products and services and that they make a copy of our privacy policy available to parents and guardians.

Conflicting Terms

This Notice works in conjunction with CTECS' Terms of Use Policy. Where there are terms that differ, this Notice takes precedence.

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