



WYOMING
DEPARTMENT OF EDUCATION

*Creating Opportunities
for Students to Keep
Wyoming Strong*

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Data Retention and Disposition

Policy #: 4000-009

Version #: 1.0

Approved By: Jillian Balow, Superintendent, State of Wyoming
Department of Education

Effective Date: July 1, 2017

Purpose:

The purpose of this policy is to fulfill the requirements of W.S. 21-2-202 (a)(xxxiv)(K) to develop, “standards and protocols to remove personally identifiable information in order to provide for data collection and analysis without disclosing the identity of the student whose data is being collected and used”.

Scope:

This policy applies to all State of Wyoming Department of Education (WDE) workforce members including, but not limited to full-time employees, part-time employees, trainees, volunteers, contractors, temporary workers, and anyone else granted access to sensitive information by WDE. All workforce members are responsible for the security of protected information. In addition, this policy applies to all workstations and other computing devices owned or operated by WDE and any computing device allowed to connect to internal network.

Policy:

Electronic Data

The Wyoming Department of Education Data Governance team will review collections and stored data regularly to eliminate personally identifiable information (PII) whenever possible.

Part of this review will include maintaining a data retention schedule that defines the types of data collected and the period of time they must be maintained at the student level. Data will be aggregated wherever possible and the department will eliminate data that have are no longer used for data analysis, reporting, or audit.

The data team will review all data sets prior to adjudication into the production database to evaluate the need to retain PII for future needs or requirements.

All data sharing contracts must include clauses for the ownership, storage, retention, and destruction of WDE or school district data.

The WDE Data Governance Team is responsible for:

- Maintaining procedures required to support this policy
- Supporting and ensuring compliance by workforce members

Non-Electronic Data

Wyoming Statute § 9-2-410 states: “All public records are the property of the state. They shall be delivered by outgoing officials and employees to their successors and shall be preserved, stored, transferred, destroyed or disposed of, and otherwise managed, only in accordance with W.S. § 9-2-405 through 9-2-413.”

Additionally the following apply to the WDE, CFR-2012-Title 7 Volume 4 Section 210-23, Free and Reduced Lunch and Department of Education, Archive Review, Page 164 – 171.

Responsibilities:

The WDE Records Management Custodian will be responsible for overseeing the implementation of the Data Retention and Disposition Policy for all non-electronic data.

Compliance:

Failure to comply with this or any other security policy will result in disciplinary actions as per HR Policy. Legal actions also may be taken for violations of applicable regulations and standards such as state and federal rules to include the Family Educational Rights and Privacy Act (FERPA).

Procedure(s): None

Form(s): None

References:

- The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99); <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

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