

## **Supplemental Information**

Pursuant to Education Law § 2-d and § 121.3 of the Regulations of the Commissioner of Education, NYSED is required to post information to its website about its contracts with third-party contractors that will be provided Access to or receive Disclosure of Student Data and/or APPR Data.

**1. Name of Contractor:** Onondoga-Cortlandt-Madison BOCES: C015306

**2. Description of the exclusive purpose(s) for which the Student Data and/or APPR Data will be used:**

**3. Type(s) of Data that Contractor will be provided:**

Yes Student Data

No APPR Data

**4. Contract Term:**

Contract Start Date: 07/01/2024

Contract End Date: 06/30/2029

**5. Subcontractor use and written agreement requirement:**

Yes Contractor will use Subcontractors.

If Contractor plans to use Subcontractors, Contractor will not utilize Subcontractors without a written contract that requires the Subcontractors to adhere to, at a minimum, materially similar data protection obligations imposed on the Contractor by state and federal laws and regulations and this contract.

Yes Contractor agrees to bind its Subcontractors by written agreement.

**6. Data Transition and Secure Destruction**

Yes Contractor agrees that the confidentiality and data security obligations under this DPA will survive the expiration or termination of this contract but shall terminate upon Contractor's certifying, that Contractor and its Subcontractors:

- a. Are unable to Access any Information provided pursuant to this contract; and
- b. Securely transfer Disclosed Student Data and APPR Data to NYSED, or at NYSED's option and written discretion, a successor contractor in a format agreed to by the Parties; and
- c. Securely deleted and destroyed Disclosed Student Data and APPR Data.

## **7. Challenges to Data Accuracy**

Yes Contractor agrees that parents, eligible students, teachers, or principals who seek to challenge the accuracy of Student Data or APPR Data will be referred to NYSED and if a correction to data is deemed necessary, NYSED will notify Contractor. Contractor further agrees to facilitate such corrections within 21 days of receiving NYSED's written request.

## **8. Secure Storage and Data Security**

Please indicate where Student Data and/or APPR Data will be stored:

Yes Using a cloud or infrastructure owned and hosted by a third party.

Yes Using Contractor owned and hosted solution.

Other:

## **Please describe how data privacy and security risks will be mitigated in a manner that does not compromise the security of the data:**

OCM BOCES has a documented IT policy and governs the controls surrounding all areas of user access to decrease the risk that data, systems and other information will be inappropriately accessed, changed, deleted or compromised. Through our administrative collaboration which includes but is not limited to our administrative leadership team, our Data Protection Officer, our Director of Technology and our Central New York Regional Information Center (CNYRIC) we have created and maintained a robust system to secure data and also to provide yearly data protection training to every OCM BOCES employee. In addition, the Data Privacy service provided by the CNYRIC and to OCM BOCES includes the following:

- Information Security Policy
- Internet Access & Security Policy
- Incident Response Policy
- Breach & security Failure Notification policy
- Risk Management Policy
- Disaster Recovery Plan
- Parent Bill of Rights

## **9. Encryption requirement**

Yes Contractor agrees that Student Data and APPR Data will be encrypted while in motion and at rest.

## **10. Contractor Certification.**

Contractor certifies that Contractor will comply with, and require its Subcontractors to comply with, applicable State and Federal laws, rules, and regulations and NYSED policies.

Contractor's Name Onondoga-Cortlandt-Madison BOCES: C015306