

APH STUDENT DATA CONFIDENTIALITY POLICY

The US Congress passed the "Act to Promote the Education of the Blind of March 3, 1879," 20 U.S.C. 101-106a. This Act set up a system to provide free school books and tangible apparatus for blind students and named the American Printing House for the Blind (APH) as the national central source of these educational materials.

By this Federal Act, Congress created an annual appropriation for the specific purpose of "manufacturing and furnishing books and other materials (Quota Materials) specially adapted for instruction" of students who are blind in the United States and its Territories and possessions, the Commonwealth of Puerto Rico, and the District of Columbia.

In order to determine who is eligible for Federal Quota Materials, an annual national census is taken. The effective date of this census is the first Monday of January each year. The purpose for the census is to identify students who qualify as meeting the definition of blindness or function according to the definition of blindness and are enrolled in a public education or vocational rehabilitation (VR) program.

APH understands that this yearly census seeks personally identifiable information (PII) contained in education records and personal information contained in VR records of service, and APH acknowledges our responsibility to respect the confidentiality of student records received and to act in a professional manner in the handling of all student data. APH will ensure that confidential data, including data on individual students, is not created, collected, stored, maintained, or disseminated in violation of any applicable State and Federal laws. Furthermore, APH agrees to the following guidelines regarding the appropriate use of student data collected for the Annual Census required by Federal law for the sole purpose of identifying students who are eligible to receive a portion of the Federal Quota.

- APH will comply with all applicable Federal and State privacy laws governing PII contained in education records maintained by local education agencies and state education agencies, including
 - The Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g and 34 CFR Part 99
 - The confidentiality of information requirements in the Individuals with Disabilities Education Act (IDEA), 20 U.S.C. 1417(c) and 34 CFR §§300.610-300.626.
- Further, APH will ensure that it will use any personal information contained in VR records of service only for purposes directly connected to the administration of the VR program, specifically for the purpose of ensuring that students served by the VR program obtain the books and other instructional materials needed to participate in the VR program (34 CFR 361.38(b))

• Student data will only be obtained for the Annual Census. Information gathered will include only:

- Name
- Date of birth
- School system or agency in which student is enrolled
- Grade Placement
- Measurement of vision in right eye
- Measurement of vision in left eye
- Primary reading medium
- Primary Language of Learner

• APH policies limit the sharing of individually identifiable student data. Only the agency responsible for collecting Quota Information will have access to the PII submitted. If APH receives a request for PII, APH will direct the requesting party to contact the original agency that submitted Quota information. APH will not disseminate PII information.

• APH will store all PII on a secure server within a protected password environment, and will lock hard copies in a secure cabinet not accessible by the public.

• APH will maintain the PII for the duration of the yearly Quota Cycle, beginning the first Monday in January and APH will destroy electronic information and shred hard copies of PII before the first Monday in January of the following year.

• APH will maintain State aggregate numbers yearly but will not indicate location of students within the state or district.