

**Student Information Systems Security Policy  
For  
Free and Reduced Lunch Data  
02-09-04**

The purpose of this document is to provide districts and ESDs guidance on confidentiality requirements as they create their confidentiality policies for the National School Lunch/School Breakfast program data including using the data to address Federal No Child Left Behind Act (NCLB) reporting requirements.

- Student Information Systems (SIS) must have multi levels of security to protect Student Free and Reduced Lunch status.
  - login/password security.
  - Security to limit only authorized individuals to see individual student Free and Reduced price data. This level of security could be achieved through a unique screen available only to authorized individuals, a data element mask only for authorized individuals or a unique F/R security class/group (or equivalent) where access would be restricted to authorized individuals.
- Authorized individuals must have a legitimate need to know the status of a student in order to secure meal benefits, administer or enforce a federal education program or handle data for state or federal reporting needs at the individual student level.
  - Example: Teachers, principals or other personnel should not have access to this information for classroom or other uses other than Free and Reduced Price data collection, processing, and reporting.
  - Example: A district has a form associated with testing that has a field for marking whether a student is eligible for F/R. The F/R data must be added as the last step in the process so that only the authorized individuals responsible for final reporting has access to the student level data.

If this level of security cannot be achieved, the school district must get a signed consent from the household to have the program eligibility status disclosed. The consent must be obtained prior to the disclosure. For any student that does not have a signed consent, the status shall not be included in the student record.

- District Superintendents will verify that the local student records system conforms to this policy. Verification will be a document signed by the superintendent that will be kept in the local Free and Reduced Lunch program operators files.
- Authorized district personnel may have access to individual student data to provide aggregate level reporting/ information without needing household consent.

Other instances when consent from household prior to disclosure is required for:

- A) Individuals and programs not authorized in the National School Lunch Act (local initiatives such as School/activity fee reduction, free textbooks, bus fare reduction, transportation planning)
- B) Federal Health Programs (Medicaid or the Children's Health Insurance Program)
- C) Disclosing information that goes beyond that allowed under the National School Lunch Act (program or individual is allowed access to name and status and wants household size or income)

Disclosure agreements with any individual outside the administration or enforcement of the National School Lunch Program, School Breakfast Program, Special Milk Program, Child and Adult Care Food Program and Summer Food Service Program is recommended.

## NCLB Economically Disadvantaged Data Collection:

NCLB requires a breakdown of data at the student level for a number of categories with “Economically Disadvantaged” being one of those categories.

The Oregon Department of Education (ODE) defined “Economically Disadvantaged” as those students eligible for “Free and Reduced priced meals. Federal confidentiality guidelines for the National School Lunch/School Breakfast Programs focus on limiting access to only individuals needing to see the data as a part of their duties and responsibilities. Federal guidelines do not prevent this data from being kept in automated systems as long as access can be limited. Some district Student Information Systems have had a data element for Free and Reduced price meal eligibility for some time. Many other districts will be making this change for school year 2003-2004 as it is the least intrusive way of meeting reporting requirements. Automated Student Information Systems vary as to how user access is limited. Thus districts must determine the method in which access will be implemented and meet the federal guidelines.

The ODE student level identifier system (SSID) is used to assign IDs and maintain a limited amount of demographic/program data for each student in the state. The SSID system file format was modified for school year 2003-2004 to include additional data elements to reduce data collections and/or collect data for NCLB purposes. “Economically Disadvantaged” was one of the data elements added to the file.

There will be an “Economically Disadvantaged” student level collection in May 2004 for school year 2003-2004. The students identified in this collection will have the economically disadvantaged indicator on their student assessment records for the school year marked with a Y. The collection will use the SSID file format.

Oregon School Districts have options on when and how to submit “Economically Disadvantaged” data to ODE.

- Data may be submitted at any time during the school year to the SSID system as part of SSID submissions. This data can be transferred to the May collection database via a collection function called “Generate From SSID File”.
- Submission can be by using the ODE web on-line screen to submit data one student at a time at the time of collection.
- Submission can be by creating and submitting a file from the local SIS or other system for all students.