CoSN
LEADING EDUCATION INNOVATION

Protecting Privacy
in Connected Learning
A CoSN Leadership Initiative

Security Questions to Ask of an Online Service Provider

Network Operations Center Management and Security

- Does the Provider perform regular penetration testing, vulnerability management, and intrusion prevention?
- Are software vulnerabilities patched routinely or automatically on all servers?
- Are all network devices located in secure facilities and under controlled circumstances (e.g., where access is managed via ID cards, entry logs, etc.)?
- Are backups performed and tested regularly and stored off-site?
- How are backups secured? Disposed of?

Data Storage and Data Access

- Where will the information be stored and how is data "at rest" protected (i.e. data in the data center)?
  - » Will any data be stored outside the United States?
  - » Is all or some data at rest encrypted (e.g., just passwords, passwords and sensitive data, or all data) and what encryption method is used?
- How is the data protected in transit? (e.g., TLS, SFTP, HTTPS)
- How will the information be stored? If the cloud application is multi-tenant (several districts on one server/instance) hosting, how is data and access separated from other customers?
  - » Records for a School System must be maintained separately, and not be mingled with data from other School Systems or users. That does not mean that a multi-tenant solution can't be used, however you will want to ensure that technical or physical separation is provided.
- Are the physical server(s) in a secured, locked and monitored environment to prevent unauthorized entry and/or theft?

Disclaimer: CoSN is a professional association comprised of school system technology leaders, not lawyers. While we aim to provide valuable tools to help you navigate these issues, you should not rely solely on these tools for legal advice. In all circumstances, please seek appropriate legal or other professional advice regarding specific facts and circumstances pertaining to your school system. This document does not cover all privacy law or policy. You should always consult your legal counsel to understand how federal, state, and local laws and policies may apply to your school system.

- Who has access to information stored or processed by the Provider?
  - Under FERPA, individuals employed by the Provider may only access school records when necessary to provide the service to the School System.
  - Does the Provider perform background checks on personnel with administrative access to servers and School System data?
- What is the Provider's process for authenticating callers and resetting access controls, as well as establishing and deleting accounts?

Availability

- Does the Provider offer a guaranteed service level?
- What is the backup-and-restore process in case of a disaster?
- What is the Provider's protection against denial-of-service attack?

Audits and Security Standards

- Does the Provider give the School System the ability to audit the security and privacy of its records?
- Have the Provider's security operations been reviewed or audited by an outside group?
- Does the Provider comply with a security standard such as the International Organization for Standardization (ISO), and the Payment Card Industry Data Security Standards (PCI DSS) for specific types of data?

Data Breach, Incident Investigation and Response

- Has the Provider agreed to inform you in a timely manner of a breach involving your data, in compliance with applicable laws?
- Will the Provider notify, or assist you in notifying, any affected individuals in compliance with applicable laws?
- Will the Provider assist you by providing a clear explanation of any such incident, including providing you with documentation on the root cause, scope, mitigation and steps taken to ensure protections in the future?

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