



**Charter of the  
DATA SECURITY COORDINATION ACTION TEAM  
Of the Sacramento Regional K-16 Collaborative  
Adopted as of March 18, 2025**

**I. Introduction- Mission and Vision**

The Parties to the Sacramento Regional K16 Collaborative (Collaborative)'s Primary Memorandum of Understanding (MOU) are dedicated to expanding educational pathways into healthcare, engineering, and computing sectors, as well as increasing dual enrollment and adult learning opportunities. To support these goals, effective data sharing across regional education providers is crucial.

The Data Security Coordination Action Team (Action Team) will:

- A. Develop and implement a data security coordination and communication plan (Plan) that manages and addresses student data issues, assesses agreements that permit disclosure to third parties, assesses procedures for change control, and helps ensure the Parties make only authorized disclosures of Data.
  - The Plan is established under a Memorandum of Understanding (MOU) and Secondary Data Agreement (SDA) and ensures compliance with data standards in the Security Guidelines and data privacy laws and outlines clear obligations for managing Student data access and disposal.
- B. Help ensure proper management of Student Data in compliance with relevant laws (including FERPA) and data standards such as ISO Standards and those issued by the NIST.
- C. Develop the process for confirming data destruction when Parties or their designated Authorized Users and Third Party Users leave the Collaborative or no longer have access to the data.

**II. Composition of the Action Team:**

- A. The Data Security Coordination Action Team consists of a representative from IT Leadership of each Party.
- B. Each member of the Action Team shall serve a term length of two fiscal years.
- C. The chairperson of the Action Team shall be designated by the members of the Action team, by a majority vote.
- D. The Action Team will be administratively supported by representatives from the Tech team, cybersecurity insurance, and consulting law firm for the K-16 Collaborative.

**III. Duties and Responsibilities of the Action Team**

The responsibilities of the Action Team include:

- A. Defining and approving data governance policies that apply to the shared data, while honoring the institutional policies and practices by the respective parties;
- B. Ensuring alignment of data governance practices with institutional goals and regulatory requirements;



- C. Monitoring the list of Authorized Users and Third Parties including their training compliance;
- D. Monitoring data disposal and destruction by Authorized Users and Third Parties;
- E. Serving as a mechanism for the respective Parties to monitor and have direct control regarding the use and maintenance of their education records as required under FERPA;
- F. Overseeing the implementation of data governance initiatives;
- G. Coordinating data security audits (as needed or if required);
- H. Coordinating with the cybersecurity insurance carrier to manage risks; and
- I. Serving as a mechanism for communication and coordination among Parties in the event of a data breach as a result of data-sharing and the Primary MOU, while honoring the respective Parties' institutional process for incident command response.
- J. Reviewing and assessing the adequacy of this Charter on an annual basis and make any changes using the procedures set forth in Section IV.E.

With respect to Section 3, Item G above, the Action Team shall not have access to Student Data that is the subject of an audit. In such an instance, only the auditors and the institutions that shared and received the data would have access to Student Data.

Specific roles and responsibilities for each of these positions is as follows:

- A. IT Leadership (CIO/ISO and IT directors of the institution receiving the Student Data):  
Oversee the technical infrastructure that supports data sharing and storage. Ensure that the data is securely managed and accessible, and that the IT systems of the institutions are compatible and compliant.
- B. Tech Team
- C. Cybersecurity insurance representative (or broker): Identify areas of breach risks and provide technical assistance to ensure that data is securely managed, accessible, and appropriately disposed and destroyed after use.
- D. Legal consultant: Provide guidance on legal and regulatory issues related to data sharing and ensure that Parties are complying with laws such as FERPA (Family Educational Rights and Privacy Act) and any other relevant regulations as reflected in the Primary MOU and respective SDAs.

#### **IV. Meetings and Procedures of the Action Team**

- A. The Action team shall meet as often as it determines necessary to carry out its duties and responsibilities, but no less frequently than three times annually to certify the list of Authorized Users and Authorized Third-Party, affirm requirements of data standards and FERPA laws are being met, and monitor proper data disposal as required under the Primary MOU and SDA.
- B. The meetings will be held at the call of the chairperson. Notification of meetings, accompanied by an agenda, will be made no less than 72 hours in advance of a meeting. However, emergency meetings may be convened by the chairperson(s) at any time with as much advance notice as is possible under the circumstances.



- C. The Action Team will meet either in-person or through electronic means (teleconference, video conference, etc.).
- D. The Action Team, in its discretion, may ask members of the Collaborative, including members of the Data-sharing Workgroup to attend its meetings (or portions thereof) and to provide pertinent information as necessary.
- E. A majority of the members of the Action Team present in person or by means of a conference telephone or other communications equipment by means of which all persons participating in the meeting can hear each other shall constitute a quorum. Formal action taken by the Action Team shall be by unanimous consent or by the affirmative vote of a majority of the Action Team members present at a meeting at which a quorum is in attendance. In the event that a decision or recommendation cannot be attained, the Action Team will present the decision and/or recommendation to chairs of the Data-sharing Workgroup of the Collaborative for intervention and final decision- making.
- F. The Action Team shall maintain minutes of its meetings and records relating to those meetings and shall report regularly to the Data-sharing Workgroup of the Collaborative on its activities, as appropriate, but no less than one time per calendar year.
- G. At the start of each fiscal year, the Action Team shall review its Charter. The Charter may also be amended by majority vote of the Action Team.

**V. Definitions – Terms**

- A. Education Records are records that are directly related to a student and maintained by an Educational Agency or Institution or by a Party acting for the agency or institution.
- B. FERPA means Family Educational Rights and Privacy Act and is a federal law that protects the privacy of student education records.
- C. ISO Standards is a collection of standards designed to provide guidance to organizations looking to implement strong cybersecurity. ISO/IEC 27001:2021 is the most well known.
- D. NIST means National Institute of Standards and Technology.
- E. Student Data means any written or recorded information concerning a student by which a student may be individually identified and that is maintained by an educational agency or institution.
- F. The Action Team also incorporates the definitions of terms in Exhibit A of the Primary MOU Agreement.