Texas Student Privacy Alliance (TxSPA)

Onboarding Document
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Welcome and Overview
Welcome to the Texas Student Privacy Alliance (TxSPA), an initiative of the Access 4 Learning Community. Courtesy of the Texas K-12 CTO Council and based on the great work done by the Massachusetts Student Privacy Alliance (MSPA) and other states. This valuable resource is available to every member district in Texas at no cost, and provides a database searchable by district, resource or agreement; inventories digital resources; tracks contract status; houses signed contracts; allows staff to request review of resources; and creates transparency with all stakeholders around student data privacy compliance.

These instructions and videos will show you how to join and use the TxSPA, so let’s get started!
Accounts will be activated after you have participated in the online training session by the Texas K-12 CTO Council.

Section I. Getting Started
What is TxSPA and Why Use It?
Part of the international Student Data Privacy Consortium (SDPC) that includes nationwide schools and international vendors. The Texas Student Privacy Alliance (TxSPA) is a registry of digital resources of Texas LEAs.

Districts will find the tool useful for inventory and contract renewal, plus there is real value in transparency with all stakeholders around data privacy. Stakeholders may also use the information to calibrate what their district is doing and see if others are using a particular resource. A district may add the registry page to its website and may also add a Digital Resource Request Form page. These pages allow parents, and all stakeholders, to see what resources are used within their child’s district, what data is collected (optional), and the instructional use. They allow teachers to initiate review of instructional digital resources as determined by each district and to receive feedback as it moves through the process.

Districts without fiscal and/or human resources to vet resources on their own may search the database to see how a resource is being used in other like or neighboring districts and to examine the privacy agreement in place.

The TxSPA houses the Texas Student Data Privacy Agreement (TxSDPA) developed in collaboration with legal counsel, LEAs and vendors. Early versions of the Texas Student Data Privacy Agreement (CSDPA)
were created through an extensive collaborative process including LEAS, legal counsel from TASA, TASB, TASBO, TEA, and LEAs. The final version was reviewed by LEA legal counsel and approved by the Texas CTO Council Board.

Districts are encouraged to use this agreement as the de facto K-12 privacy agreement for Texas. Vendors may additionally choose to sign the General Offer of Privacy Terms, Exhibit E, making the TxSDPA essentially a piggy-backable or umbrella agreement, requiring only the additional signature\(^1\) of the district to make it binding and eliminating any further privacy negotiations for that particular resource. Instructions on how to use the TxSDPA accompany the agreement.

**Accessing the TxSPA Website**

To access the TxSPA website, go [https://www.texask12ctocouncil.org/](https://www.texask12ctocouncil.org/), select Texas Student Data Privacy, and then select TxSPA Home Page or go directly to [https://secure2.cpsd.us/txspa/index.php](https://secure2.cpsd.us/txspa/index.php) (Image 1.1). From this page, anyone may access the site to search for resources by district, resource name or agreement type; there is no login needed. From this page, you may login or request membership.

![Image 1.1: Accessing the TxSPA Website](image)

**Using TxSPA as a Community Member**

Any community member may use the database; there is no requirement for a district to join. Without logging in, stakeholders may search the database to see what resources are in use in various districts and what agreement types are in place.

\(^1\) TxSDPA V2 will require districts to notify the vendor when they sign an Exhibit E.
Using TxSPA as a District
Most districts will choose to join the TxSPA (remember, it’s free to TX CTO Council members!). Membership will allow the district to inventory its resources, add vendor contact information, add data elements collected, add how the resource is used by grade and content area, add contract start and end dates, select the agreement type and status, download and cosign Exhibit Es, and even upload a pdf of their signed agreement.

Districts have the option of adding Customized Resources from the TxSPA to their own website and add a Digital Resource Request Form if they choose.

Training and support will be offered through the Texas K-12 CTO Council, and inquiries may be sent to txctocouncil@gmail.com.

Section II. Joining TxSPA
To join, go to the TxSPA website at https://secure2.cpsd.us/txspa/index.php and click “Learn more about Joining the Alliance” or “Join Us” at the bottom of the page (Image 2.1).

![Image 2.1: Joining TxSPA](image)

Complete the information on the “Request a School District Account” (Image 2.2) by choosing your district from the District Name dropdown list.

**Best Practice Tip:** As you begin to type the first letters in your district name, you will be directed to that part of the alphabet in the dropdown list. This is true for all dropdown lists.
Continue to complete the form and select a user name and password.

Once finished, click “Request Account.”

Image 2.2: Request a School District Account

The TxSPA administrators will acknowledge your request via email and send a follow-up email with training dates. The TxSPA administrators will approve the request once your LEA has attended training.

Once approved, you will be able to login and create additional user accounts for staff within your LEA (See Section IV).

Section III. Member Login

To login once you have an account, go to the TxSPA home page via the TX CTO Council or directly at https://secure2.cpsd.us/txspa/index.php. In the bottom left box, click “Login” which appears just under “Already a Member?” Enter your username and password and click “Login” (Image 3.1). You will be directed to your district page, and should see “Welcome, Your District Name.”

Forgot Password
If you cannot remember your password, click “Forgot Password” (Image 3.1) and enter your email address in the “Request Your Password” text box and “Submit.” A temporary password will be emailed to you.
Change Password

From time to time, a user may need to change his or her password. Additional Users added by the Account Requestor will also need to change the assigned temporary password to one of their choosing.

To change a password, login with the current Username and Password, and click “Edit Account” next to Welcome District Name to reveal the Edit District Account page. Scroll down to the Password field appearing just above “Your School’s Custom Online Resource Information,” change your password and click “Save Account Info” to save the change (Image 3.2).

**Important:** This page contains information necessary to link the Custom Online Resources page, as well as an email for the staff member who should receive Digital Resource Request Forms. Individual users should change only their password on this page. Other changes may result in broken links and or missing information on linked pages.
Section IV. Add Additional User Accounts

Districts may have more than one account. Ideally, each district has a team of people taking responsibility for the different phases of the vetting process.

To add additional users, go to the “Members Area” box on the right, click “Add Additional District Account” or go to “Tools for Participating Districts” and then click “Add Additional District Account” (Image 4.1).

Complete the user information including name, email and phone, and select a username and temporary password for each new user. Click “Add Account.” Remember, you will need to provide the new user with the username and temporary password you created.

Best practice tip: Since anyone from your community may access the site and its information (see Section VII, Search the Database) without a login, it’s best to limit the number of user accounts. Only those with accounts may create or edit resources and agreements. You may wish to have one user from IT, one from Purchasing, and one from Curriculum and Instruction, depending on your district process for vetting curriculum for student data privacy compliance.

The recommended naming convention for usernames is first initial last name.

The additional users will need to login and change their password under “Edit Account” (Image 4.2) next to “Welcome (Name of LEA)” which appears below the large graphic of a student typing.

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Section V. Search the Database

The database may be searched by district, resource name or agreement type. If you begin to type the name of the district or resource in the search field, you will be directed to that part of the alphabet.

Anyone may search the database. Without a login, you will see only those fields indicated in green on the Add Agreement (see Images 8.3) page, along with self-selected data elements.

Those few district individuals responsible for the vetting of apps for student data privacy compliance should have logins to TxSPA to enter and maintain information on resources.

Section VI. Add Resources

Once logged in, there is a two-step process to tying resources to your district. The steps are Adding Resources and Adding Agreements. In this section, we will share how to Add Resources. The process to Add Agreements will be addressed in the following section.

First, inventory all the educational resources used in your district. A template spreadsheet provides a way to document these digital resources and will also enable you to do a mass upload of those resources. **It’s critical that the template not be renamed and the spreadsheet cell names and order not be changed.**
Before you add a resource, it's important to see if the resource already appears in the TxSPA database. To check, you will need to go to Add Agreement and in Step 1, click Search Resource List for Resource Name (Image 6.1) or Search the Database by Resource Name (Image 6.2). If the resource name appears, do not add it again, but skip directly to Add Agreement for that specific resource.

Image 6.1: Check if Resource Exists under Add Agreement

Image 6.2: Check if Resource Exists under Search by Resource Name

Important: If the resource does not currently exist, you will need to add it.
**Best practice tip:** It’s important to follow the naming convention TxSPA has established for both company and resource names to avoid duplicates. If you do not have a direct contact, you may wish to add the Support Contact name and email, and list it as “Support” under Contact Name. In many instances, the Purpose may be taken directly from the resource website.

To add a single resource, click “Add Resource” in the “Members Area” found on the right side of the page and complete the information, including Company Name, Resource Name, website URL and optional logo (Image 6.3).

**Best Practice Tip:** Logos have a size requirement and although they may upload in any size, they will not display correctly if they exceed the recommended size.

Click “Continue.” Add the Contact Name, Email Address, Phone, and Purpose (Image 6.4).

Click “Continue.” You may now select the data elements collected when using this resource (Image 6.5) or click “Skip This Step” if you do not wish to add data elements at this time.

**Best Practice Tip:** In Exhibit B of the Texas Student Data Privacy Agreement (TxSDPA), vendors are asked to identify the data elements collected.

Since selected data elements are visible on all public pages, you should discuss whether or not you will manually identify data elements prior to getting a signed TxSDPA. If yes, have a written process in place and identify what documents (Terms of Service, Privacy Policy, contract) are being used to determine those data elements.

Then click “All done? Click here” to add the resource.
Best Practice Tip: It may be more expedient to use the spreadsheet to mass upload resources (Image 6.6) when you first begin to populate the TxSPA. After that initial upload, you may find it easier to add resources one by one.

Section VII. Agreement Types
Agreements are listed under Learn More about Agreement Types and may be downloaded in pdf or doc format. They include:

**TxSDPA V1:** The Texas Student Data Privacy Agreement (CSDPA) is a statewide agreement developed with a group of stakeholders, including legal counsel from various organizations, TEA and vendors. It is intended to be the de facto statewide agreement and, when signed by a vendor under the General Offer of Privacy Terms, it serves as the agreement for all LEAs within Texas.

**Important:** When the initiating LEA signs a TxSDPA and the provider chooses to sign the General Offer of Privacy Terms, the selected Agreement Type will be the TxSDPA with Exhibit E, General Offer of Privacy Terms for both the initiating and subscribing LEAs.

**TxSDPA V1 with Exhibit E, General Offer of Privacy Terms:** As noted above, when the Agreement Type is the General Offer of Privacy Terms, only the Originating LEA will select Standard Agreement with Exhibit as the Agreement Type (Image 8.1). LEAs who co-sign Exhibit E are referred to as Subscribing LEAs who should select Standard Agreement with Subscriber (Image 8.1).

Best Practice Tip: We highly recommend that you use your organization’s legal procedures for any contract. The agreement may need to be updated or changed before it is ratified. Refer to inhouse Admin Regulations to
determine if Board approval is needed. If your LEA changes the TxSDPA, it would become a District Modified (see below) and loses scalability without an Exhibit E.

**Custom District Agreement**: This agreement is specific to a district and is a customized version between the vendor and district. Prior to the development of the TxSDPA, this was the most common type of agreement.

**Declined**: This type should be used when the vendor declines to sign a privacy agreement.

**District Modified**: This type represents a slight modification of the TxSDPA made by the vendor and/or district. A District Modified Agreement loses scalability without an Exhibit E.

**In Use/District Vetted**: In absence of a formal written contract, this agreement type represents a district vetted resource in use. Upon renewal, the district should seek a written contract, preferably the TxSDPA.

**In Use/No Agreement**: This type represents a resource currently in use, but that has not been vetted for privacy compliance. Upon renewal, the district should seek a written contract addressing privacy compliance.

**Legal Drafted Guardian Release**: This type represents a resource for which there is a signed guardian release in lieu of a signed agreement with the vendor. It most often applies to resources subject to COPPA and students under the age of 13.

**Self-Hosted**: This type represents a self-hosted resource and therefore, requires no added privacy agreements.

**Vendor Specific**: This type represents a TxSDPA with slight vendor modifications (with or without Exhibit E) approved by the TxSPA team.

**Best Practice Tip**: Agreement types have been predetermined for TxSPA by a group of stakeholders. If you feel there is an agreement type not listed, please contact txctocouncil@gmail.com for clarification of existing agreements or the possibility of adding a new agreement.

**Important**: When using the Excel spreadsheet to mass upload Agreements, use only the Agreement Types listed in this Agreement Key below, as they pertain specifically to the TxSPA:

<table>
<thead>
<tr>
<th>Agreement Type</th>
<th>Key #</th>
</tr>
</thead>
</table>

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Section VIII. Add Agreements

Now that the resources used by your district appear in the database, either because you added them manually, mass uploaded them via the spreadsheet, or they already appeared in the database, you are ready for Step 2, Add Agreements. This step ties the resource directly to your district, and if you do not complete this step, you will not see a list of your resources when you Search the Database by District.

There are several types of agreements identified in Section VI. Learn More about Agreement Types. Before you tie your applications to your district, you will need to identify which agreement type you have entered into with each resource. You will also need the following information for each resource in order to complete this step: Agreement Type (TxSDPA V1, Declined, District Modified, In Use/District Vetted, In Use / No Agreement, Legal Drafted Parent Release, Self-Hosted, and Vendor Specific), Grade Level(s) and Content Area(s) (optional), Date Approved, Date Expired (optional but helpful, if using the CSPA for contract renewal), Signed Agreement (optional upload) and Status (Active, Declined, Inactive, New Request).

Best Practice Tip: The fields in green (Image 8.3) indicate those areas that are displayed publicly if you access the TxSPA without logging in. Since only a few individuals in your district will have login access, it’s important to decide as a district what information will be shared publicly and how that information will be displayed. Some districts may choose not to enter the Grade Level or Content Area, while others may choose to do so.

To add a single agreement, click “Add Agreement” in the “Members Area” found on the right side of the page, and choose the Agreement Type.

There are seven choices to Add a New Agreement: Standard Agreement (TxSDPA) with No Exhibit, Standard Agreement (TxSDPA) with Exhibit (E), Standard Agreement (TxSDPA) with Subscriber, Vendor Specific with No Exhibit, Vendor Specific with Exhibit (E), Vendor Specific with Subscriber, or Other Type of Agreement (Image 8.1a).
Standard Agreement (TxSDPA) with No Exhibit
If your LEA has a signed TxSDPA and the provider has not signed Exhibit E, select the Standard Agreement with No Exhibit, and complete the information as prompted.

Standard Agreement (TxSDPA) with Exhibit (E) as an Originating LEA
If your LEA is the first to sign a TxSDPA and the provider has signed Exhibit E to make the agreement “piggy-backable” for all other Texas LEAs, your LEA is known as the Originating LEA for Exhibit E; therefore, select Standard Agreement with Exhibit, and complete the information as prompted. You will need to

1) upload the full signed TxSDPA with Exhibit E as a .pdf. (Image 8.1a) and
2) also add just the Exhibit E (Image 8.1b) to enable other LEAs to download your Exhibit E and co-sign. To do so, select Manage Resource/Agreement Information, then select Add Addendum and add just your Exhibit E. **Your Exhibit E will not save unless you upload the .pdf at the same time.**
Once you upload a TxSDPA with E as an originating LEA, you will see ![Icon](image8.1.png) which denotes the originating LEA for that resource.

**Standard Agreement (TxSDPA) with Subscriber**

If your LEA co-signs Exhibit E of the TxSDPA, your LEA is known as a Subscribing LEA for Exhibit E; therefore, select Standard Agreement with Subscriber. The dropdown list of Resource Names includes only resources for those who have signed both the TxSDPA and Exhibit E and links your Exhibit E to the Originating TxSDPA with Exhibit E (Image 8.2). Select the resource from the list, choose the Agreement Type and Status, and complete the information as prompted. You should upload your co-signed Exhibit E in .pdf format under Upload Signed Addendum File.
Vendor Specific with No Exhibit
See Standard Agreement (TxSDPA) with No Exhibit above.

Vendor Specific with Exhibit (E) as an Originating LEA
See Standard Agreement (TxSDPA) with Exhibit (E) as an Originating LEA above.

Vendor Specific with Subscriber
See Standard Agreement (TxSDPA) with Subscriber above.

Important: When co-signing Exhibit E, it’s important to review the Data Elements (Exhibit B) chosen in the Originating TxCSDPA with Exhibit E, and revise them accordingly with the provider to reflect the needs of your LEA. You may wish to upload a revised Exhibit B with your Exhibit E as a single .pdf.

Other Types of Agreements
Complete the information as prompted. Mandatory fields include: Resource Name, Agreement Type, Date Approved, and Status. The other fields are optional, but as a district you should decide beforehand which fields you will populate, to maintain consistent information seen by teachers, students, families, and the public.

Best Practice Tip: It’s important that the TxSPA house consistent information regarding Agreement Types, so when selecting an Agreement Type, districts needs to understand the differences between them and when to use them. This will be addressed during training, but don’t hesitate to reach out to your identified support agency if you are unclear as to what they mean or uncertain as to which agreement type to select.

If left blank, Date Approved and Expired fields will default to 1969, therefore it’s important to include an approved and expiration date.

Best Practice Tip: If you do not have an approved and expiration date for an agreement, enter the beginning and ending dates for the current school year.
This will allow you to use the tool for contract renewal purposes and act as a reminder to review the actual expiration date.

The Grade Level boxes refer to the actual grades within your district using the resource, but do not reflect all the grades for which the resource may potentially be used.

The Content Area boxes refer to the subjects within your district for which the resource is currently using.

**Important:** Make sure the file name has no spaces or punctuation beyond - or _ marks, or it will not upload.

The final step is to select the Status which may be Active, Declined, Inactive, or New Request. Active should be selected for all resources in use; Declined when a resource has been declined; Inactive when a formerly Active resource is no longer in use; and New Request for resources currently in the vetting or contractual process.

Image 8.3: Green Fields = Publicly Shown information
Section IX. Tools for Participating Districts

The Tools for Participating District pages of TxSPA may only be accessed by those individuals logged in with a Username and Password.

Manage Resource/Agreement Information

These tools allow for edits to existing resources and agreements and allow upload of signed and/or annotated agreements in pdf format. When logged in, a user may Add, Edit, Copy or Delete Agreements, Add or Edit Resources, Add or Edit Data Elements, and Upload Agreements.

If a signed pdf agreement has been uploaded, a user may click “Agreement Type” for a specific resource to see the uploaded agreement.

Add Customized Resource Listing to Your Website

To add a listing of resources associated with your district to your district website, login and follow these steps:

1. Click on Edit Account Information and add a custom page title and introduction in the appropriate text fields.
2. Create a blank page and/or hyperlink within an existing page to:
   https://secure2.cpsd.us/txspa/district_listing.php?districtID=xxxx (Note: when logged in, your district id will replace the last four x’s.)

You will see all text and data, for which you have entered information, that appear in green on the “Add Agreement” page (Image 8.1). If you did not upload a logo image and/or enter the Grade Level, Content V. 7-15-18
Area, or Data Elements Collected when adding/editing a resource or agreement, these fields will be blank.

**Add Digital Resource Request Form to Your Website**

To add a request form to your district website, login and follow these steps:

1. Click on Edit Account Information and add the email of a staff member who should receive request emails.
   i. Create a blank page and/or hyperlink within an existing page to:
      
      [https://secure2.cpsd.us/txspa/new_request.php?districtID=xxxx](https://secure2.cpsd.us/txspa/new_request.php?districtID=xxxx) (Note: when logged in, your district id will replace the last four x’s.)

   ![Image 9.1: Progress of Requested Resource Review](image)

   **Best Practice Tip:** While this tool allows individuals a process for requesting review of a resource that triggers email notification as it moves through various stages of approval or denial, each district will need to define its own process for who will review, what review steps are required in what order (e.g., first curriculum for educational alignment, then technology services for compatibility with infrastructure, devices and operating systems, followed by legal or other privacy review, and then purchasing may send and track the contract), and the criteria by which each of these individuals assess the resource.

The requested resource shows as a New Request on the Manage Resource/Agreement pages.

The Progress status is selected from a dropdown menu that needs to be manually updated by choosing the new progress and clicking “Update” (Image 9.1).
In addition to notifying the requesting teacher of the progress, you may also select an admin user to trigger their piece of the process (Image 9.2).

**Image 9.2 Admin Progress of Request Resource Review**

**Bulk Import Template**
There is an Excel spreadsheet that may be populated for mass upload of resources and/or agreements. When opening this page, the template will automatically download. For greater detail, see Sections V and VI above.

**Export List of All Resources**
This tool allows districts to directly mass export all resources.
Email All Participating Districts
This tool allows you to email all participating districts, and should be used by administrative support, such as Texas CTO Council. TX CTO Council will use this tool to inform member districts when new tool functionality or updates are made.

Build a Contract Tool
This tool allows districts to build their own contract based on recommendations from PTAC and other jurisdictions with specific state laws. After naming the document, you may select clauses by clicking the + icon on the right, order the clauses, and then preview the document. Texas LEAs should use the TxSDPA rather than build their own contract.

Download Student Data Privacy Agreement
These pages describe the various agreement types and allow a pdf version to download.

Add Additional District Account
This tool allows the initial account holder to add other accounts for users who will have full edit rights. For greater detail, see Section IV above.

Edit Account Information
This page houses information for the district, along with information for the main contact person. It also houses the district website URL and Customized Digital Resource Listing Information (see above), should a district choose to link the resources in use to their website.

Statistics
This page shows national, state and your district quick stats for number of participants, active and declined agreements, new requests and inactive agreements.

Need Help: Email Dana Greenspan
If you need assistance with any part of the TxSPA or TxSDPA, click on Email Dana or email txctocouncil@gmail.com.

Logout
To logout of TxSPA, click “Logout.”

Section X. Sample Email Language
Asking Provider to Sign the TxSDPA Sample Language
LEAs have asked for sample language to send to a provider when asking them to sin the TxSDPA. There is value for a provider to see the same requests from varying LEAs, and it’s helpful to LEAs to convey a consistent message. Here’s a sample:
Dear Provider:

As we enter into a contract (enter into contract renewal) for digital resources, we are asking all our providers to sign the Texas Student Data Privacy Agreement or TxSDPA (attached).

Texas schools are now part of the Texas Student Privacy Alliance. As part of the TxSPA and to easily facilitate the contracting process, we have a statewide Texas Student Data Privacy Agreement (TxSDPA). The TxSDPA was created by a team of districts, providers and legal counsel, and is designed to meet both federal and Texas student data privacy requirements. Due to the extensive process in developing the TxSDPA and its wide acceptance by districts and providers, the TxSDPA is now recognized as the de-facto statewide agreement in Texas and is the sole agreement districts are urged to use. It further eliminates the need for a provider specific contract that will require further vetting and analysis by districts and providers.

As a provider, you may sign the TxSDPA with us, and then additionally sign Exhibit E, the General Offer of Privacy Terms, which means any district in Texas may co-sign this exhibit and the privacy piece is complete with no further action needed. We encourage you to sign the TxSDPA, and Exhibit E. Providers who sign the TxSDPA will be shown in the TxSPA, a statewide registry searchable by K-12 stakeholders. Currently, there are ten other states in the process of creating their own Alliance sites, with additional states developing their own statewide agreements.