

Instructional Technology Plan

2022-2025 School Years

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District Information

Peru Central School 17 School Street Peru, NY 12972 (518) 643-6000 http://www.perucsd.org

Peru, New York is located off Interstate 87(Exit 35) which runs north and south. It is 11 miles south of Plattsburgh, New York, 135 miles north of Albany, New York, and 70 miles south of Montreal, Canada. The center of town is located minutes from Lake Champlain, the (almost) sixth "Great Lake" in North America. We are considered a rural area with large apple orchards and dairy farms. Some of the people who live in Peru also work in Plattsburgh at the State University, and Clinton Correctional Facility.

Peru Central School District is located at 17 School Street, Peru, NY. The town has a total area of 92.4 square miles and it was first settled in 1772. The Peru Central School District provides education for approximately 1,900 students in grades Pre-K through 12 in Clinton County. As a school community, Peru Central School District expects to provide a positive, safe, caring and child-centered environment where teaching and learning are emphasized and rewarded, and where there is mutual respect, and they expect to hold themselves accountable for this via continuous assessment of programs, practices and operations.

The district mission is to "Empower all students to be lifelong learners by providing a nurturing environment in which they are inspired to pursue their dreams and contribute to the global community."

Peru Central School District Vision & Mission



Peru Central School District Strategic Plan

Vision:

Preparing our students for success.

Mission:

Empower all students to be lifelong learners by providing a nurturing environment in which they are inspired to pursue their dreams and contribute to the global community.

Core beliefs:

- Students are our first priority.
- All students can learn and we provide for each student's individual needs.
- High quality learning is rigorous and relevant.
- We embrace innovation and strive for continuous improvement.
- We bring talent, passion, and integrity to our school every day.
- We value inclusivity and hold diversity and respect paramount.
- We build powerful, trusting relationships where teamwork and collaboration are valued.
- We commit to our community's safety and security.

At Peru, we never give up!

Empowering all students

Instructional Technology Vision Statement

Vision

Preparing our students for success

Mission

Empower all students to be lifelong learners by providing a nurturing environment in which they are inspired to pursue their dreams and contribute to the global community.

We expect students and staff members to ...

- Be aware of the impacts of computing technologies on society through many lenses.
- Utilize computational thinking concepts and practices
- Understand the interconnectivity of basic network and system design.
- Apply digital literacy to enhance learning and improve the community by becoming collaborative, productive, innovative, and ethical citizens.
- Protect data and the computing resources that they access through practicing basic cybersecurity safeguards.
- Remain intentional in all decisions regarding technology.

Instructional Technology Planning Team

Nicholas Damiani - Facilitator Bonnie Berry - BOE Representative Scott Storms- District Leadership Team Mary Sexton- Building Leadership Team Sara Shult - Building Leadership Team Cortney Calkins - Teacher Paula Delaurentiis - Teaching Assistant

Jillian Devins - Teacher Kelly Crowley - Teacher Trish Thurber - Teacher Carrie Pierson - Teacher

Stephanie Petro - Teacher/Parent/Technology Connie Markowicz - Teacher/Parent/Technology John Mitchell- Technology Integration/Parent

Shane Porter - Network Technician
Jared Duguette - Network Technician

Isaac Mitchell - Student Frederick Beck - Student Jonas Petro - Student Quinn Atwood - Student

Instructional Technology Goals 2022-2025

Instructional Technology Goal 1

Students in the Peru Central School District will have increased access to upgraded technology inclusive of Desktops, Laptops, Chromebooks, Tablets and Interactive Panels in order to increase and maintain student access 30th, 2023 as by Junemeasured by district technology surveys.

- **NYSED Goal Alignment:** Provide technology-enhanced, culturally- and linguistically-responsive learning environments to support improved teaching and learning
 - Methods of Measure
 - Utilize district wide technology surveys to collect data on the impacts of the 1 to 1 initiative.
 - Utilize an inventory tracking tool to monitor device distribution.
 - Leadership team meetings for budget planning and development.
 - Formative Data collected through teacher and administrative observation
 - How evidence is analyzed and utilized:
 - The data that is collected through the identified methods of measure will be reviewed by the following groups:
 - District Technology Meetings (Weekly)
 - District Leadership Team Meetings (Bi-Weekly)
 - District Technology Planning Committee (Monthly)
 - Grade Level and Department Meetings (Weekly/Monthly)
 - Goal successfully met when:
 - 1 to 1 device access exists for ALL students in grades K-12.
 - The district establishes a clear purchasing path for device sustainability.

Instructional Technology Goal 2

The Peru Central School District will utilize the NYS Computer Science and Digital Fluency Learning Standards to engage, enhance, and extend teaching and learning opportunities to promote digital independence in the global community by September 2024, as measured through district technology surveys and instructional observations.

NYSED Goal Alignment: Increase equitable access to high-quality digital resources and standards-based, technology-rich learning experiences

- Addressing the NYS Computer Science and Digital Fluency Standards timeline.
 - Impacts of Computing
 - Society
 - Ethics
 - Accessibility
 - Career Paths
 - Computational Thinking
 - Modeling and Simulation
 - Data Analysis and Visualization
 - Abstraction and Decomposition
 - Algorithms and Programming
 - Networks and Systems Design
 - Hardware and Software
 - Networks and The Internet
- Methods of Measurement
 - Yearly District-wide Technology Survey for Students, Teachers, and Parents.
 - Annual review of curriculum maps.
 - Formative Data collected through teacher and administrative observation
 - Meeting records from curriculum development/review sessions.
 - Annual review of software usage
- How evidence is analyzed and utilized:
 - The data that is collected through the identified methods of measure will be reviewed by the following groups:
 - District Technology Meetings (Weekly)
 - District Leadership Team Meetings (Bi-Weekly)
 - District Technology Planning Committee (Monthly)
 - Grade Level and Department Meetings (Weekly/Monthly)
- Goal successfully met when:
 - The integration of NYS Computer Science and Digital Fluency Learning Standards is explicitly stated in curriculum maps.
 - Students and teachers are using instructional technology within their teaching and learning.

Instructional Technology Goal 3

The Peru Central School District will promote and model digital literacy in order to ensure ethical and safe digital citizenship for all students and staff by June 30th, 2025 as measured by the annual District Technology Survey.

NYSED Goal Alignment: Develop a strategic vision and goals to support student achievement and engagement through the seamless integration of technology into teaching and learning

- Addressing the NYS Computer Science and Digital Fluency Standards timeline.
 - Cybersecurity
 - Risks
 - Safeguards
 - Response
 - Digital Literacy
 - Digital Use
 - Digital Citizenship
 - Methods of Measurement
 - Yearly District-wide Technology Survey for Students, Teachers, and Parents.
 - Annual review of curriculum maps.
 - Formative Data collected through teacher and administrative observation
 - Meeting records from curriculum development/review sessions.
 - Annual review of software usage
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 - The integration of NYS Computer Science and Digital Fluency Learning Standards is explicitly stated in curriculum maps.
 - Students and teachers are using instructional technology within their teaching and learning.

School Device Philosophy

Students Devices PreK-2

The Peru Central School District understands that technology use and access looks different at the Primary level. Teachers and students in PreK through Gr. 2 have consistent access to sets of devices for instructional purposes.

- Device Assignment
 - o Grade 2: 1 to 1 Chromebooks for classroom use only and Grade Level set of iPads.
 - Grade 1: 1 to 1 Chromebooks for classroom use only and small group set of classroom iPads
 - Kindergarten: 1 to 1 iPads for classroom use only
 - o PreK: Small group sets of classroom iPads
- When provided with a device, students learn with technology in order to access information, collaborate with other students, and problem solve, while building independence and comfort with technology.

Students Devices Gr. 3-12

In an effort to continuously improve student performance and growth, and meet the expectations set by our Technology Vision Statement, the Peru Central School District has invested in its instructional use of technology. We are revamping our learning spaces, teaching styles, and infusing the use of technology into our curriculum. In an effort to provide a well-rounded education and prepare our students for the global world, we are striving to put a device in every student's hands from Kindergarten through grade 12. Our goal is to enhance the academic experience of every student and transform the way teaching and learning takes place on the Peru Campus. Furthermore, teachers in the Peru Central School District are assigned a portable laptop for lesson development and delivery. These assigned devices are integrated with docking stations, interactive, and non-interactive panels in each instructional location.

Here is a collection of the potential benefits related to student learning, assessment. and implementation of new innovative teaching models:

- Recognizing that students do not learn the same material at the same pace and in the same way,
 1:1 technology makes it possible for teachers to differentiate content delivery and student assignments, and use a variety of teaching methods/tools to be culturally responsive.
- In a 1:1 environment, the learning shifts from the more traditional instructor-led model to a more student-centered focus. Accessibility to online learning tools gives students options that naturally engage them in the learning process. Technology integration designed explicitly to support

- learning provides effective differentiation, while increasing a teacher's ability to enhance and extend learning opportunities.
- Developing digital fluency supports 21st century-style critical thinking, collaboration, communication and creativity—which are essential skills required in high school, college, and the workplace. A student can choose from myriad technologies to implement effective research strategies, to collaborate with peers, and publish findings.
- Students experience greater independence, greater task completion, and more efficient workflow
 with the ability to electronically manage and share tasks in a single environment (as opposed to
 across multiple binders, notebooks, etc.) that travels easily between school and home.
- Sustaining hardware access that is designed to support innovative instructional practices will
 assist teachers/administrators with creating student centered learning environments that are
 culturally responsive, foster positive academic experiences, prepare students to complete
 rigorous tasks, and empower students to become independent learners.

Chromebook Guidelines

All Students will:

- Follow the guidelines in the Student Handbook, the District's Acceptable Use Policy, and any relevant state and/or federal laws.
- Use school computers for educational purposes in a safe, legal, ethical, and responsible manner.
 I will not do anything with school computers that impacts anyone else's happiness, safety, or privacy.
- Ensure that the Chromebook battery is fully charged before the beginning of each school day.
- Play only school-appropriate computer games--at school if I have my teacher's permission or at home if I have my parent's permission. Students and parents should be mindful of the District's standards around violence, harassment, bullying, and other antisocial behavior.
- Maintain system software settings as configured unless told to change them by a teacher or a District IT technician.
- Not make any changes that will damage the Chromebook. I will not customize the settings on other school computers.
- Handle the Chromebook (and any school computer) with care, keeping it clean, dry, away from food and drink, and shielding it from extreme hot or cold temperatures.
- Use the Chromebook on a stable platform such as a desk or table and not on a soft surface like a bed, which will block the cooling vents and cause it to overheat.
- Always keep the Chromebook in its District approved case.
- Not attach stickers to (unless directed to do so by a teacher or other District staff person), write on, or otherwise deface the Chromebook.
- Always have the Chromebook in my personal possession, in the care of a teacher or another responsible adult, or in a secure location (e.g., my locker).
- Not trade Chromebooks, chargers, or batteries with another student.
- Notify my teacher or District IT staff immediately if the white PCSD Asset # sticker on the bottom
 of the Chromebook begins to peel off or is damaged or missing.
- Notify my teacher or District IT staff immediately if my Chromebook is damaged, lost, or stolen.
- I will not attempt to repair a damaged Chromebook or have someone other than District staff repair it.

- Keep my personal information private, i.e., I will not share my birthday, password, social security number, address, or phone number(s).
- Not use a school computer to circumvent (go around) or violate copyright laws, or to steal software, movies, music, or any other type of protected media.
- Not use tools that prevent the web browser from logging my browsing history.
- Not delete the browsing history, unless told to do so by a teacher or a District IT technician.
- Return the Chromebook at the end of the school year, or any other time as requested.

Student Personal Device Use

The use of personal computers by students is not permitted for classroom instruction. However, the use of a personal cell phone by High School students for academic purposes is left to the discretion of the classroom teacher. Middle school students are not permitted to use cell phones during classroom instruction.

Staff Devices

In an effort to increase flexibility and workspace mobility, the District assigns a school issued device to each employee throughout the term of employment. The device breakdown is outlined below

- Administration: Principals and Department Supervisors are assigned Dell 5310s and Lenovo L390s.
- Teacher: Teachers are currently assigned a windows laptop to meet all instructional needs. Currently, the District has deployed Dell 5310s and Lenovo L390s to all teachers.
- Teaching Assistant: Teaching Assistants are currently assigned a windows laptop to meet all
 instructional needs. Currently, the District has deployed Dell 3310s to all Teaching Assistants.
- Clerical/Office Staff: Currently all Clerical/Office Staff receive a Dell 3420 laptop to integrate with the district provided docking station

Classroom Instructional Hardware

Elementary Building: All Elementary Classrooms will be outfitted with an interactive whiteboard panel and teacher docking station.

Secondary Building: All Secondary Classrooms will be outfitted with non-interactive panels with ActionTech Casting devices.

Small Group: Small group instructional spaces will be outfitted with a 55" non-interactive panel with ActionTech Casting devices.

In School Charging Access

The School Board approved Student Chromebook Guidelines states that all students must "ensure that the Chromebook battery is fully charged before the beginning of each day."

As Chromebooks age, the battery life expectancy decreases so providing opportunities for charging during the school day is vital. Laptop charging lockers will be strategically placed throughout buildings to provide secure charging for students during downtime; ie studyhalls, lunch/interim, PE etc...

Students will NOT:

- be provided a District Loaner Chromebook while a device is charging.
- be provided "community" chargers in each instructional space.
- be provided with a "community" chromebook in each instructional space.
- be prepared if the option to be unprepared exists.

Student Device Damage Protocol

Accidental Damage: Accidental damage occurs when a student follows the chromebook guidelines, but damage still occurs. Accidental damage will be determined by a member of the Administrative / Technology Team after an investigation occurs.

- 1st break Device will be repaired / replaced as determined by a District Technician. Students will have access to a loaner device while the device is being repaired.
- 2nd break Device will be repaired and inventoried. The student will be assigned an older model chromebook for the remainder of the calendar school year or a date selected by a member of the Administrative Team..

Intentional / Neglectful Damage: Intentional/neglectful damage occurs when a student misuses the device they have been assigned or a device that has been assigned to another student. Intentional damage must be reported immediately to a building office or a member of the technology team.

 The District retains the right to request payment for any damage to or loss of school property.

Charger Loss or Damage: The District is not responsible for replacing chargers that have been lost or damaged. Students are responsible for replacing a lost or damaged charger, which must be returned with a school issued Chromebook. The expected replacement charger is a **65W USBC Laptop Charger**

Computer Science and Digital Fluency

The New York State K12 Computer Science and Digital Fluency Learning Standards were adopted by the Board of Regents in December 2020. The new standards focus on five key concepts:

- Impacts of Computing
- Computational Thinking
- Network & System Design
- Cybersecurity
- Digital Literacy

Impacts of Computing

Computing affects many aspects of the world at local, national, and global levels. Individuals and communities influence computing through their behaviors and cultural and social interactions. In turn, computing influences new cultural practices. Informed citizens understand the ethical and social implications of the digital world, including equity and access to computing and computing technologies.

The Impacts of Computing Standards promote an understanding of the evolving impact of computing technologies on society through many lenses, including personal, social, cultural, accessibility, legal, economic, and ethical.

Society	Computing can change or reinforce cultural practices and equity within society. Human social structures that support education, work, and communities have been affected by the ease of communication facilitated by computing. Governments enact laws to influence the impact of computing technologies on society.
Ethics	Computing is not done in a vacuum. The question of ethics in computing is for both creators and users of technology. If computer scientists and end users do not take into account biases and ethics of what has been built, algorithms and programs may have unintended impacts on societies.
Accessibility	The development and design of computing systems needs to take into account the needs and wants of diverse end users and purposefully consider potential perspectives of users with different backgrounds and ability levels. Identifying potential personal bias during the design and implementation process maximizes accessibility in product design, and awareness of professionally accepted accessibility standards helps to evaluate computational artifacts for accessibility.
Career Paths	The increased connectivity between people in different cultures and in different career fields has impacted the variety and types of careers that are possible. There are also many possible career paths within computer science itself, as well as different specialties within each field, that make computer science a broad and encompassing opportunity.

Computational Thinking

Computational thinking involves thinking about and solving problems in ways that can be carried out by a computer. Computational thinking not only underpins all theory and application of computer science, but also influences many other subject areas. Computational thinking includes both core concepts, such as algorithms and variables, and core practices, such as abstraction, decomposition, data analysis, modeling, and simulation, that are vital not only to the design and development of computer programs but also to the strategic use of computational power to solve problems across disciplines. The process of creating meaningful and efficient solutions, often done in collaboration with others, typically involves these steps: defining the problem, breaking apart large problems into smaller ones, recombining existing solutions, analyzing different solutions, using data to inform new potential solutions, and looking at information in new ways to develop innovative solutions.

Computational thinking plays an important role in supporting the creation of solutions to problems, both large and small. Algorithms, programs, simulations, and data are essential to all computing systems, empowering people to communicate and collaborate with others around the world. The standards promote development of foundational skills, knowledge, and experience to solve problems by creating solutions that utilize computational thinking concepts and practices.

Modeling and Simulation	Modeling is the process of representing a system to allow one to observe, understand, or simulate it. Models can be used to simulate real world phenomena that are not easy to observe or reproduce, and often generate simulated data that can further understanding of the system or make predictions.
Data Analysis and Visualization	Data analysis is the process of cleaning, transforming, organizing, clustering, and categorizing data to discover useful information, draw conclusions, and aid in making decisions. Data can be visualized in a variety of ways (including graphs and charts) to aid in and communicate the results of the analysis.

Abstraction and Decomposition

Abstraction is the process of reducing complexity by focusing on key elements. The study of a complicated system often starts by simplifying it and addressing just the most important parts. Complex computer programs also rely on abstraction to isolate particular routines or tasks, especially if those tasks are common. A programmer can then call on that routine, often written by others, without needing to understand its details. Decomposition is the process of strategically breaking complicated problems or tasks into smaller parts that are simpler to understand, program, and debug.

Algorithms and Programming

An algorithm is a sequence of steps designed to accomplish a specific task. Algorithms can be translated into programs, or code, to provide instructions for computing devices. Algorithms are central to programming. Programming is the process of designing and developing code to perform a specific task. It includes the transformation of an algorithm into a specific language that a computer can read and execute, testing code under controlled conditions to ensure its accuracy, debugging the code to resolve errors, and producing documentation both for end users to understand how to use the program and for other developers to assist in following the logic within the program.

Network and Systems Design

Computing devices typically do not operate in isolation. Networks connect computing devices to share data and resources and are an increasingly integral part of computing. Networks and communication systems provide greater connectivity in the computing world by providing fast, secure communication, and facilitating innovation. Individuals interact with data using a variety of input and output devices that are part of a more complex computing system. The hardware and software that make up a computing system process data in digital form. A basic understanding of hardware and software is useful when troubleshooting a computing system that does not work as intended.

The Networks and Systems Design standards aim to prepare students to understand the basic functioning of the computing systems and networks that are used as fundamental tools in our personal and professional lives.

Hardware & Software	A computing system is composed of hardware, software, and the individuals who use them. Hardware refers to the physical components that make up a computing device. Software refers to the program instructions that operate on such hardware.
Networks & The Internet	Networks are formed by connecting individual devices in a variety of ways. Data is stored on one or more devices in a network and transferred between devices using a set of protocols or rules. The internet is an example of a global network that transmits data between many devices around the world.

Cybersecurity

In a digital world, all individuals have a responsibility to protect data and the computing resources they access. Cybersecurity encompasses the physical, digital, and behavioral actions that can be taken to increase this security. These measures are meant to ensure the confidentiality and integrity of data and computing resources, as well as ensure that they are accessible to the users who are supposed to have access to them. Digital security includes understanding and identifying risks, implementing appropriate safeguards, and being prepared to respond to potential attacks.

The Cybersecurity standards prepare students to understand why data and computing resources need to be protected, who might access them, and why they might do so whether intentionally malicious or not. It is important that students know how to employ basic safeguards to protect data and computing resources and how to appropriately respond if a breach occurs.

Risks	Risk is a combination of a vulnerability, the likelihood that the vulnerability will be exploited, and the severity of consequences if the vulnerability is exploited. It is important to understand why data and resources need to be protected and how they might be compromised so the correct safeguards can be put into place.
Safeguards	Programmers and individuals must know how to protect their data and computing resources with common safety measures. When combined, various physical, digital, and behavioral precautions can create a level of digital security.
Response	When a security breach occurs, individuals must decide what actions to take. This takes into account what type of breach occurred and how to improve security moving forward.

Digital Literacy

Digital literacy is a multifaceted concept that extends beyond skills-based activities and incorporates both cognitive and technical skills. It refers to the ability to leverage computer technology to appropriately access digital information; to create, share, and modify artifacts, and to interact and collaborate with others. Digital literacy includes understanding the benefits and implications of using digital technologies to be successful in our contemporary world.

Digital Use	Digital technologies are a part of everyday life. A variety of digital tools exist to create, revise, and publish digital artifacts, as well as communicate and collaborate with others.
Digital Citizenship	Digital citizenship focuses on empowering learners to use online resources, applications, and spaces to improve communities, make their voice heard, and curate a positive and effective digital footprint. It encourages students to engage respectfully online with people with different beliefs and better determining the validity of online sources of information.

NYS CS & DF Learning Standards Additional Resources

New York State Computer Science and Digital Fluency Learning Standards (PDF)

NYS CS & DF Learning Standards Glossary of Terms (PDF)

NYS CS & DF Learning Standards Master List (Spreadsheet)

Data Privacy and Security

Data Privacy Officer

Mr. Scott Storms, Superintendent of Schools

Mr. Nicholas Damiani, Instructional Technology Coordinator **Email:** ndamiani@perucsd.org **Phone:** 518-643-6025

Personally Identifiable Information

Education Law Section 2-d and Part 121 of the Commissioner's Regulations outline requirements for educational agencies and their third-party contractors to strengthen data privacy and security in order to protect student and annual professional performance review of personally identifiable information.

Protected Student Data

The term "student" refers to any person attending or seeking to enroll in an educational agency, and the term "personally identifiable information" ("PII") uses the definition provided in FERPA. The term PII includes, but is not limited to:

- Student Name
- Date of Birth
- Parent Names
- Photos
- Video of Students
- Student Email Address
- Student Address
- Student ID Number
- Social Security Number
- Student Medical Information
- Special Education Information
- Other Indirect Identifiers
- Information that alone or in combination would allow a reasonable person to identify the student.

Teacher and Principal Data

Personally identifiable information from the records of an educational agency relating to the annual professional performance reviews of classroom teachers or principals that is confidential and not subject to release under the provisions of Education Law §3012-c and §3012-d is subject to Education Law 2-d.

Data Privacy and Security Overview & Policy

Part 121 of the Commissioner's Regulations requires agencies to adopt a policy on data security and privacy by October 1, 2020.1 Additionally, the law requires agencies to publish the policy on the district's website. To learn more about this requirement, review Part 121.5 of the Regulations.

PeruCSD Data Privacy Policy

Parent's Bill of Rights

A Parents' Bill of Rights for Data Privacy and Security must be published on the website of each educational agency and must be included with every contract an educational agency enters into with a third-party contractor that receives personally identifiable information. The list below highlights required elements that must be included in the Parents' Bill of Rights. To learn more about this requirement, agencies can review Part 121.3 of the Regulations and Section 3 of Education Law 2-d.

PeruCSD Parent's Bill of Rights

Third-Party Contract Agreement and Approved Vendor List

A third-party contractor is any person or entity, other than an educational agency, that receives student data or teacher or principal data from an educational agency pursuant to a contract or other agreement for purposes of providing services to such agency, including but not limited to data management, conducting studies, or evaluation of publicly funded programs. To learn more about this requirement, agencies can review Part 121.2, 121.3, 121.6, 121.9, and 121.10 of the Regulations.

Example of PeruCSD Third Party Contract
Approved Vendor and Software List
NERIC Approved Vendor and Software List

Unauthorized Disclosure Complaint Procedures

Parents, eligible students (students who are at least 18 years of age), principals, teachers, and employees of an educational agency may file a complaint about a possible breach or improper disclosure of student data and/or protected teacher or principal data.

- To submit a complaint, please download and complete the <u>PeruCSD Unauthorized Data Disclosure/Data Breach Form</u>. Paper forms are also available in the main office of each school and the District Office.
 - Completed forms may be submitted via email to the Data Protection Officer, Mr. Nicholas Damiani, at ndamiani@perucsd.org, or forms may be given directly to a building principal who will submit the form appropriately.
- 2. The District assigned Data Privacy Officer will contact the complainant by phone, email, or through Parent Square to review the complaint and initiate an investigation.
- 3. Investigations will be completed and finalized as quickly as possible. All investigations should be completed within 60 calendar days from the receipt of the complaint. If an investigation will be extending beyond the 60-day window, the complainant will be contacted about the delay and provided with an updated timeline for completion.
- 4. The Peru Central School District will keep an updated record of all complaints of data breaches or unauthorized releases of student/staff data & their disposition in accordance with applicable data retention policies, and report complaint reports & investigations as directed by NYS Ed Law 2d / Part 121 Regulations to the NYSED Chief Privacy Officer.