

Committee Members in Attendance

- Jennifer Butts
- Jorge "Yuri" Csapo
- Brian Horsman
- Scott Maize
- Cheryl Mosier
- Virge "T.O." Owens
- Dan Rohner
- Phillip Romig III
- Jenifer Ross-Amato
- John Sullivan
- Mike Wilcox

Jeffco Staff in Attendance

- Mary Beth Bazzanella
- Carol Eaton
- Jeremy Felker
- Matt Flores
- Craig Hess
- Curtis Lee
- Dan McMinimee
- Brett Miller
- Chris Paschke
- Hope Corrales
- Jef Fujita
- Betty Standley
- Fran Williamson

I. Call to Order

- a. The meeting was called to order at 4:42 p.m. by Brett Miller, chief information officer.

II. Introduction and Background

- a. Brett Miller explained that the discussion from this meeting and the March 20, 2017 meeting will be used to review Jeffco security work. The discussions will be used during the presentation to the Board of Education on April 6, 2017. TDPAC has been allotted 30-minutes to present and 15 minute a question and answer period. Any interested TDPAC members are welcome to be part of this presentation.
- b. Mr. Miller then referred the members to the information sent to them around the TLE Seal and the CIC and SANS Top 20. Today's agenda will be used to compare and contrast these sets of control-based standards. Input from members will be noted for our work moving forward.
 - [TLE Seal framework](#),
 - [TLE Practices](#),
 - [TLE in the News](#),
- c. Chris Paschke, executive director, Data Privacy and Security, explained the evolving policies and gave an overview of TLE Seal referenced in the links above. He explained how Jeffco has limited resources which must be used effectively as a district. The goal for the meeting discussion today is to look at the two sets of compliance standards, allowing us to quantify and ground difficult conversations around security and privacy. It is important to learn from the successes and failures the committee has experienced in the field. Knowing that compliance can be great for setting the bar, it can also be used as a crutch for poor management or lack of planning. This can also set a false expectation for the community.
- d. Mr. Paschke then posed questions to the committee to get their response and ideas.

III. How can this work build trust with parents and community?

- a. Jeffco's model seems to be better than the TLE Seal. This seems to be a compliance-based model which can give a false sense of security
 - i. Jeffco is looking at this seal as a starting place. With the bill that passed last year, part of our transparency is to try and expose a lot of this and put it into play.
 - ii. Mr. Paschke implemented training for the security program this year and while it hasn't reached all employees, our vision is getting us a lot closer.
 - iii. How do we tell a good story around what we are doing to protect student data, also knowing that we could double or triple our resources and we could still get hacked? This brings the question of how to balance that messaging to the community.

- b. Is there a politically advantageous reason to go the TLE?
- c. One committee member indicated the Seal doesn't build trust alone, but knowing how Jeffco works the two together is helpful. The seal can be a matter of perception... one more tool.
- d. Another committee member indicated the Seal was too lean, noting this particular Seal's contact person is the same contact/owner that helped develop framework that sells marketing to companies on how to advertise to young people. This same company also advertises to school districts on how to protect student data. These two together seems suspicious.
- e. Another committee member indicated it wasn't worth the time and money.
 - i. This committee was developed to do the work of TLE
 - ii. If we use TLE, it would be a lot of reporting. Is that worthwhile?

IV. How do you feel this work falls short?

- V.** Do the TDPAC members believe the TLE seal is an acceptable goal for small and medium school districts?
- a. The more agnostic you can be, the better
 - b. Make choices because it is good for kids
 - c. Why do we need to recreate the wheel just to have a wheel if we are already meeting the standard? If we can provide the information for those that are looking, why isn't that enough?
 - d. If you are looking to support other districts, let them bring some resources to the table and form a partnership

VI. How mature do you feel this set of standards is compared to the industry?

- a. A committee member asked whether Jeffco is actually looking to purchase a Seal.
 - i. Mr. Paschke replied that Jeffco is not actually looking for a Seal but looking for input and what the committee thinks about the regulatory industry and develop practices from there
- b. If we don't have a seal, how do we build communication with parents? We have a lot of information around security and data privacy on the web, but there are still questions. What are parents looking for or how do we communicate?
 - i. Transparency--making it available and easy to find
 - ii. Trust - buying a Seal doesn't necessarily help because if you have the Seal and then down the road you have a breach, you are left to explain to the public why you have a breach. We have then done a huge disservice
 - iii. The bigger you advertise, the more you put a target on your back
 - iv. When the breach comes... Certification is a good thing for a Seal because one can say best practices were followed. We did our best and we still lost.
 - v. Is it big enough to follow industry standard?

VII. Mr. Paschke then led a discussion around the SANS Top 20 and gave an overview of what they had to offer. The links below are provided for review:

- [SANS guidelines](#),
- [SANS History](#),
- [SANS Mapping](#),
- [Controls and Background](#),
- [Measurements](#),
- [In the News](#)

- a. Does the district have insurance? Does it require us to have SANS?
 - i. As a district we are not required to have anything
 - ii. What is the litigation and physical risk of the district?
 - It is next to impossible to get monetary damages for abuse of student data
 - iii. Everyone cares when it's too late

- iv. Make sure the software product is being used correctly and the user can communicate in a meaningful way back to the parent, Otherwise, the product should not be used.
- b. What gives Jeffco the most threat? People just click--they don't pay attention
 - i. There was some discussion around possible solutions, around this, but nothing settled on i.e. making e-mail obscure, taking e-mail away if too many offenses.
- c. How do we help small Charter Schools?
 - i. What is the goal? If they have nothing, then yes, the Seal would be good. It is better to have something than nothing. If the goal is to have the Seal just to offer a sense of security, then it is not good
- d. Do any of you have experience in SANS Top 20 compliance?
 - i. One committee member indicated they had the same discussion with different players. They looked at several options and settled with ISO because that was what the auditor would accept. It was more of a financial decision. SANS was a waste of time for them because their board of trustees was willing to throw their weight behind ISO. Need management support to make any of these work
 - ii. Another member suggested said to go with something that had a significant percentage of expertise behind it
 - iii. One committee member felt uncomfortable because SANS is just a company selling a service
- e. Do you feel compliance is successful in your organizations?
 - i. Federal Level – There are Have a lot of opportunities that need to be vetted before decisions can be made.
 - ii. Federal DOD – If playing to compliance I can only think that you are not doing what you need to do. What can you do to mitigate a breach?
 - iii. Higher Ed – Spend lots of money on compliance but not sure it's money well spent
 - iv. State – As good as the people that are doing it. Compliance audits are paper generators
 - v. The question was asked of the teachers if they would be more or less likely to pay attention if there was a certification. Response was they are mostly overwhelmed by everything in the day-to-day survival in the classroom. Some use technology correctly and can explain it while others are not able to. The challenge is that teachers come to make a difference for their kids; however, they only have a finite amount of time given all the other pieces they are required to do in their jobs.

VIII. Closing

- a. The meeting adjourned at 6:12 pm.