



LOS ANGELES UNIFIED SCHOOL DISTRICT

REFERENCE GUIDE

TITLE: Unified Digital Instructional Procurement Plan (UDIPP)

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ROUTING

Principals
Teachers
Instructional
Technology Specialists
School Administrative
Assistants
All Offices

PURPOSE: The purpose of this reference guide is to describe the District's Unified Digital Instructional Procurement Plan (UDIPP) process. The UDIPP process ensures that vendors offering various digital instructional software, licenses, services or online subscriptions meet the District's requirements for data protection and functionality.

The UDIPP process examines the proposed product's or service's information security and data disclosure practices, student and staff login mechanisms, and compatibility with the District's Learning Management System (LMS). This guide also describes the policies that LAUSD employees shall follow, specifically when dealing with a vendor whose digital product requires the transfer of student and/or employee data.

Following the guidelines in this document will help ensure the security and privacy of student and employee data in accordance with the Family Educational Rights and Privacy Act (FERPA), other federal and state regulations and District policies governing the release of personally identifiable information (PII) that may be required when using the proposed products and services.



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When a vendor of digital instructional materials and/or assessment tools uses student data (which may or may not include PII) to enable staff or students to access and use the product, the vendor must complete the UDIPP and submit it to the District's Procurement Services Division for compliance review. Once a UDIPP is approved, the product may be acquired, subject to District procurement policies for acquisition of goods and services.

MAJOR CHANGES: This is a new reference guide.

INSTRUCTIONS:

I. THE UNIFIED DIGITAL INSTRUCTIONAL PROCUREMENT PLAN (UDIPP)

A. Purpose

The UDIPP application process is designed to screen a vendor's digital instructional product and determine if it meets District standards. There are five (5) requirement areas the product must pass in order to allow the digital instructional application to be acquired or purchased and used in schools.

1. Educational Requirements
2. Student Data Privacy Requirements
3. Information Security Requirements
4. Single Sign-On (SSO) Requirements
5. Learning Management System Compatibility Requirements

B. Catalog of products that meet the requirements

Only UDIPP-approved digital learning applications may be considered for classroom use. A catalog of products with the product name, publisher, UDIPP approval status (and expiration if approved) and a short description of the product is available to District staff at <https://udipp.lausd.net>, after logging in.

C. Procedure

If a product is not listed in the catalog, school and office staff shall request the vendor complete and submit a UDIPP application, which can be found at <https://udipp.lausd.net>. The UDIPP application is completed and submitted entirely online. Vendors submitting UDIPP applications containing intentionally untrue or misleading information in any of the five (5) required evaluation areas may be subject to suspension and/or debarment actions that prevent the vendor from participating in future District procurements.



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D. Benefits

By adhering to this procedure, school and office staff can avoid potential liabilities for any system damage and/or misuse of data caused by the use of non-compliant software, breach of data security and unauthorized release of PII.

E. Exemptions

Digital product exemption questions can be directed to the Procurement Services Division via email at procurement@lausd.net. Email is the most efficient method of addressing these matters with the Division.

II. ADMINISTRATORS' ROLE

- A. School site administrators must not provide any student data to vendors through unapproved means, including but not limited to: email, flash drive, CD, shared drive (i.e., Google Drive, OneDrive, etc.) or any other format. Information shared through these methods is subject to loss or theft. This restriction also applies to participation in potential pilots (see "D" below).
- B. School site administrators must not sign documents that commit the District to guarantees of business, terms or conditions.
- C. School site administrators and employees should not agree to accept any offers or commitments with any vendor, whether oral or in writing, without delegated authority from the Board of Education.
- D. School site administrators and employees must be cautious about agreeing to pilot projects with vendors, even those that may be viewed as "no-cost" pilot projects. "No-cost" pilot projects sometimes carry the expectation that a school will serve as a host site for a vendor's products/services.
- E. If in doubt, seek support from Procurement Services Division and/or Local District Buyers.

III. REFERRING A VENDOR TO PROCUREMENT



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A. New vendors/products

1. Vendors should visit <https://udipp.lausd.net> to access the UDIPP application. The UDIPP application must be completed and submitted in its entirety. Questions are not to be left unanswered. The use of “N/A” or “not applicable” in any answer which does not indicate this as a choice is not allowed.
2. All vendor questions should be directed to the Procurement Services Division or the Local District Buyer who supports the school with which the vendor has been working.
3. Once a vendor submits a UDIPP application, each of the five requirement areas will be reviewed by the appropriate District staff. If all requirements are met, the vendor will be notified. If any one of the five requirements is not met, reasons will be cited and given to the vendor to take corrective action.

B. Existing vendors/products

Vendors that do not have an approved UDIPP on file and are already providing digital products or services to schools must be referred to the Procurement Services Division. A completed UDIPP application must be submitted to ensure District technical requirements and privacy protections are in place.

- ### C. Additional guidelines for school administrators can be found in Attachment B.

IV. PRODUCTS SUBJECT TO A DATA USE AGREEMENT

- ### A. Products, including hardware, that require the transfer of student or employee PII may require a Data Use Agreement (DUA) only or a complete UDIPP.

The vendor can determine which document is required by answering the first 3 questions on the UDIPP application. The application is designed to inform the vendor of the appropriate course of action, based on vendor responses.

Below are examples of products or services which may not lend



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themselves to a clear choice at first glance:

1. A pilot for a product or service that requires the transfer of student or employee data (e.g., entering student or employee data into a system) would require a UDIPP. FERPA and other applicable laws, regulations and policies bind the District, to protect student and employee PII.
2. A photography service that provides yearbooks or ID cards but does not provide any instructional component and/or require students or staff to login to a system to access the service/products would require a DUA.

These provisions apply to both for-profit and not-for-profit / non-profit organizations.

- B. The DUA must be submitted to the Office of Data and Accountability, via the Procurement Services Division for review, approval and processing.
- C. Modifications to the DUA are prohibited. Any questions or concerns regarding the contract language should be submitted to the Procurement Services Division for clarification and may delay the processing of the UDIPP and/or the DUA.

V. UDIPP REQUIREMENTS

- A. Vendors must meet the District standards in all of the following areas:
 1. Educational
It is the responsibility of the site administrator to determine the educational value of the product(s) being used to meet identified students' needs. Division of Instruction UDIPP approval authorizes use and further field evaluation – school user evaluation of the product's educational value and impact on student outcomes.

Note: Division of Instruction UDIPP approval represents neither an endorsement nor a definitive claim regarding the educational value and quality of the product.



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2. Student Data Privacy

The Office of Data and Accountability provides oversight for student level data privacy by assuring that all PII being requested complies with FERPA, California Education Code § 49076, and other applicable statutes and policies. In collaboration with service providers, the Office of Data and Accountability and ITD will coordinate efforts to ensure that student, teacher and school data is provided in a timely manner.

3. Information Security

The IT Security sections of the UDIPP collect information about a vendor's product to determine if it is compliant with federal, state, and District information security requirements. All vendors must minimally comply with the District's baseline security standard which, addresses the most common security vulnerabilities. Vendors that process student PII must comply with an additional set of information security and privacy controls.

4. Single Sign-on

The District requires the use of LAUSD credentials to log into all external services, including online learning tools and accounts, using the stated requirements in the UDIPP for Single Sign-On (SSO). District staff and students must only use LAUSD usernames and passwords (SSO) when signing into District UDIPP-approved applications.

5. Learning Management System

The District uses a District-wide Learning Management System (LMS), Schoology, to provide digital curricula in a standard, unified format container that is accessible to parents, teachers, students, and administrators. Publishers must enable the integration of curricula and data using the District LMS by providing content that adheres to standards published by the Instructional Management System (IMS) Global Learning Consortium. These standards enable compatibility and allow publishers to integrate content into an LMS, as well as, transfer content packages from their system into the LMS. In addition to adhering to interoperability standards, publishers must provide all course content, including but not limited to textbook materials, assessments, activities, lesson plans, etc., in a manner that will allow the District, or a District-



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contracted provider, to integrate materials directly into the LMS.

VI. ADDITIONAL RESOURCES

The following resources may be used for additional guidance.

A. Contract Bench

1. To find vendors whose products and services have been reviewed for both educational and technical requirements, please review the bench contract list. Vendors on the bench have been reviewed through a rigorous Request for Proposal (RFP) process that requires products/vendors to pass the UDIPP screening and an additional examination for educational value.
2. Products and services of bench vendors can be acquired by purchase order without seeking competitive bids. For a list of approved bench vendors visit <https://achieve.lausd.net/Page/14462>.

VALIDATION AND DOCUMENT MANAGEMENT

The owner of this document is the Procurement Services Division's, Purchasing Services Manager, who will check and, if necessary, update the document at least once a year. When evaluating the effectiveness and adequacy of this document, percentage of UDIPP applicants that meet the requirements set forth in this reference guide must be considered.

RELATED RESOURCES:

BUL-6887, Pupil Records: Access, Confidentiality, and Notice of Educational Rights, March 6, 2019

BUL-1077.2, Information Protection Policy, July 18, 2017

BUL-6633.0, App and Website User Agreements, January 25, 2016

BUL-999.13, Responsible Use Policy, March 5, 2019

California Business & Professions Code §22575, et seq

California Education Code §35182.5, §49073, et seq.,

Children's Online Privacy Protection Act (COPPA), 15 USC §§6501-6506



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Family Educational Rights and Privacy Act (FERPA), 20 USC § 1232g; 34 CFR Part 99; Protection of Pupil Rights Amendment, 20 USC §1232(h)

ISO/IEC 27001 standard, clauses: *A.18.1.1, A.18.1.3, A.18.1.4, A.18.2.2, A.18.2.3*

For more information on the UDIPP, go to:

<https://udipp.lausd.net/>

For more information on the RFP process, go to:

<https://achieve.lausd.net/Page/3904>

For more information on existing bench contracts, go to:

<https://achieve.lausd.net/Page/14462>

ASSISTANCE:

For assistance or further information related to the procurement process, Data Use Agreements or the Unified Digital Instructional Procurement Plan, please contact the Procurement Services Division at (213) 241-3087 or procurement@lausd.net.

For assistance with technical questions, please contact the Information Technology Division at (213) 241-4906.

For assistance with education requirement questions, please contact the Division of Instruction at (213) 241-5333.

For assistance with student data privacy or the Data Use Agreement, please contact the Office of Data and Accountability at (213) 241-2460.

For assistance regarding the learning management system requirements, please contact Personalized Learning Systems at (213) 241-3017.

For assistance regarding the Information Security requirement, please contact IT Security at (213) 241-3017.

For assistance regarding Single-Sign On, please contact the Office of Identity Management at (213) 241-1388.



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ATTACHMENT A

IMPORTANT TERMS

Personally Identifiable Information (PII)

“Personally Identifiable Information” or PII is any data that alone, or in combination with one or more other data fields, can lead to the identification of an individual. This includes information that can be used to distinguish or trace an individual’s identity either directly or indirectly through linkages with other information. PII includes, but is not limited to, the student’s name, other family member names, home address, school, class, teacher, grades and other information that is linked to a specific student.

Education Record

An “Education Record” is a record that contains information that is directly related to a student and is maintained by the District.

Disclosure

“Disclosure” means to permit access to or the release, transfer, or other communication of PII contained in education records by any means, including oral, written, or electronic means, to any outside entity.

Data Use Agreement

A “Data Use Agreement” is a formal, written agreement between the District and an outside entity for the disclosure of PII in compliance with Federal and State information privacy laws and regulations and District policies.

PRIVACY LAWS

- A. Federal and state law protects the disclosure of PII from pupil education records to outside parties without parental consent. Specifically, the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. §1232g, 34 Code of Federal Regulations Part 99, and California Education Code sections 49060-49085 govern the release of PII.
- B. There are several ways in which the disclosure of PII can occur: 1) a school or an office may enter into a contract with an outside entity under which PII is disclosed through a direct transfer (usually electronic) to the contractor; 2) PII can be disclosed through access to a contractor’s website that requires PII from student users; or 3) a less common disclosure of PII occurs through allowing outside entities access to District student information systems.
- C. In certain circumstances there are exceptions to the consent requirement that allow the District to disclose PII. One exception that pertains to the District allows for disclosure of PII to contractors



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and other outside entities who are performing services usually performed by District employees and that further the legitimate educational interests of students.

Note: Whenever PII is disclosed to an outside entity, a District Data Use Agreement (DUA) must be completed and filed to ensure compliance with FERPA and the Education Code.



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ATTACHMENT B

GUIDELINES FOR SCHOOL ADMINISTRATORS

Prior to initiating a purchase with a vendor for digital instructional software, licenses, online subscriptions or related services (product and/or service), the following questions should be considered:

- Has the vendor completed and submitted a UDIPP application?
- Has the vendor's UDIPP application been approved by the District?
 - If the answer to both of the above questions is yes, then proceed with creating a Shopping Cart for Procurement to negotiate better rates and terms and awarding of purchase order(s) accordingly.

If the vendor does not have a District-approved UDIPP on file with Procurement Services Division (PSD), then the vendor should be directed to the PSD website (<https://achieve.lausd.net/Page/10475>) to access, complete and submit a UDIPP for District approval.

If the vendor requires a unique login and/or collects student data associated with the product/service they are offering, and does not have an approved UDIPP on file with PSD, then no purchase order or contract(s) are allowed to be awarded to the vendor (even for "No-Cost Pilot" projects).

All LAUSD employees and any current or potential vendors are expected to adhere to District ethics policies regarding doing business with the District. These policies can be found online at <https://achieve.lausd.net/ethics>.

To protect employee and student data privacy, employees must only accept terms of service and use Apps and websites that are in compliance with District policies and standards, specifically District Bulletin BUL-6633 – App And Website User Agreements. Employees must thoroughly read the terms of service of an App or website, including its End User License Agreement (EULA) and Privacy Policy, prior to accepting the App or agreement terms and utilizing the App or website services. A violation of this policy is considered a violation of the Responsible Use Policy (Bulletin No. BUL-999.12) and can result in loss of Internet usage privileges and other administrative action, as appropriate. Apps and services listed in the UDIPP Vendor and Product Catalog (see <https://udipp.lausd.net>) have been vetted as acceptable in meeting UDIPP requirements regarding Privacy Policy.

Technical support for all vendor-provided digital instructional applications is the responsibility of the vendor who shall provide a toll-free technical support number, available during the prime period of performance (Monday - Friday 7:00 AM – 4:30 PM Pacific Time). If LAUSD technical assistance is required, it shall be the vendor's responsibility to contact LAUSD's Information Technology Division. In all cases, it shall be the responsibility of the vendor to take support calls and provide information regarding resolution to issues to the end user. In no instance shall the vendor inform the end user to contact LAUSD departments or administrators to resolve a technical issue.

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All questions and clarifications regarding the UDIPP process should be directed to the Local District Buyer who supports the specific school with which the vendor has been working. Local District Buyer contact information is available on the Procurement and Contract Administration Branch website (<https://achieve.lausd.net/Page/3611>).