December 18, 2018

Jessica Ramakis
Acting Chief Privacy Officer
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Andrew Smith
Director
Bureau of Consumer Protection
U.S. Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Ms. Ramakis and Mr. Smith,

We represent a diverse group of education, consumer, and business advocates who are united in our interest in protecting student privacy. The framework of federal and state laws, best practices, and public commitments to protect student privacy has expanded in recent years. Over 125 new student privacy laws have passed in states since 2013, California passed a new consumer privacy bill that has implications for student data privacy, and over 300 companies have signed the Student Privacy Pledge.

Our organizations were pleased when the U.S. Department of Education (ED) and the Federal Trade Commission (FTC) hosted the “Student Privacy and Ed Tech” workshop last year. Participants in all-day workshop called for more clarity on the Children’s Online Privacy Protection Act (COPPA) and Family Educational Rights and Privacy Act (FERPA) requirements. It has been over a year since the workshop and no action has been taken to clarify the requirements. We urge ED and the FTC to provide additional guidance on the intersection of COPPA and FERPA.

Thank you for your leadership in helping to protect student privacy.

Sincerely,

AASA: The School Superintendents Association
Alliance for Excellent Education (All4Ed)
Association of Computer Professionals in Education
California Educational Technology Professionals Association
Cambridge Public Schools
Common Sense Kids Action
ConnectSafely.org
Future of Privacy Forum
Internet Keep Safe Coalition (iKeepSafe)
National Education Association
National PTA
Privacy Vaults Online, Inc. (PRIVO)
Public Advocacy for Kids
Software & Information Industry Association
The Access 4 Learning (A4L) Community