

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