Chair Doherty and members of the House Education Committee,

I support HB 2711. This bill establishes standards relating to personal identifying information that State Board of Education must follow when adopting rules related to student education records.

- **Section 1(d) may be too vague**. How would the Board determine when data is "no longer needed for the purposes of preparing the student's education program or the student's application for employment or application to a post-secondary institution of education"?
- This bill, HB 2710 and HB 2709 would implement **fair information practices**[1], although **data minimization**[2]—the surest way to ensure that data won't be compromised—isn't mentioned. HB 2709 addresses individual access and individual participation specifically. HB 2710 regards information management and accountability. HB 2711 regards collection, use and disclosure limitations of data.
- The FIP Openness Principle is not addressed in any proposed legislation—especially if one considers databases maintained by third party vendors.
- The bill does not discriminate between the different data collections of the LEA or SEA. Oregon's student information system is Synergy.[3]

Below are recommendations from the Parent Privacy Coalition to Congress for yesterday's hearings.

Kris Alman