

Data Sharing for Advertising School Options

Version 2

About Version 2

On November 4, 2023, a similar document was presented to the Utah State Board of Education (USBE) Law and Licensing Committee outlining options for sharing data with requesting LEAs for the purposes of advertising school options. This document is a new version of that original document, and differs in several ways from the original:

- The term “charter school marketing” has been replaced with “advertising school options” to clarify that the goal of the data sharing is advertising school choice rather than soliciting money.
- Language specific to charter schools has been replaced with references to LEAs more broadly. This is because, while this issue was brought up by charter schools, the Board may choose to consider allowing or requiring this data sharing between any LEA (district to district, charter to charter, district to charter, or charter to district).
- Staff have added information about the estimated financial impacts of the different options.
- This version includes additional options—Options 5, 6, and 7—that have been identified as potential considerations. The document also includes multiple methods for accomplishing different options, which may have different financial impacts.

Purpose

This document outlines some options that Utah State Board of Education (USBE) staff have identified for addressing the issue of sharing family contact information between LEAs.

Issue

This issue was originally brought to the attention of the Board by charter schools—primarily early-college high school charter schools—seeking contact information for families so they can send materials to families to make them aware of their schools and programs. Historically, these charter schools have sought family contact information from school districts, and the school districts provided the information. However, in recent years, school districts regularly decline to share the data. This makes it difficult for the charter schools to make families aware of their schools and programs.

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For discussion in the December 8, 2023 Law and Licensing Committee Meeting
Contact: Katy Challis, Director of Privacy, katy.challis@schools.utah.gov

Options Summary Table

		One-time cost	Annual cost
Option 1	Local education agencies (LEAs) request family contact information directly from other LEAs		
Method 1.1	LEAs choose whether to share family contact information with a requesting LEA.	\$0	\$0
Option 2	USBE shares family contact information with requesting LEAs in accordance with FERPA's directory information exception		
Method 2.1	LEAs share directory information opt out indicator with USBE via UTREx collection	\$131,440 – \$1,613,440	\$25,600
Method 2.2	LEAs share information about which students have opted out of directory information with USBE via another method (e.g., spreadsheet upload)	\$118,000 – \$1,600,000	\$79,000
Option 3	USBE shares family contact information with requesting LEAs for families who have granted consent		
Method 3.1	LEAs collect parent consent indicator and share with USBE via UTREx	\$233,800 – \$1,676,800	\$25,600
Method 3.2	LEAs collect parent consent indicator and share with USBE via another method (e.g., spreadsheet upload)	\$240,600 – \$1,683,600	\$79,000
Option 4	Massachusetts model		
Option 5	Upon request, LEAs are required to share family contact information with requesting LEA.		
Method 5.1	Upon request, LEA shares family contact information with the requesting LEA, likely via spreadsheet.	\$78,000 – \$1,623,360	\$0 – \$1,946,880
Option 6	USBE collects parent consent directly from parents and shares with requesting LEAs		
Method 6.1	USBE collects parent opt in indicator directly from parents via form maintained by USBE	\$44,000	\$45,560

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Method 6.2	USBE collect parent opt in indicator <i>and</i> contact information directly from parents via form maintained by USBE	\$20,000 - \$50,000	\$41,200
Option 7	USBE hosts a website with school choice information, such as fliers from each LEA.		
Method 7.1	LEAs submit advertising information about their schools and programs to USBE, which are posted on a public website.	\$15,000	\$13,000 - \$59,800

Option 1 (current): Local education agencies (LEAs) request family contact information directly from other LEAs

Summary: LEAs request family contact information from other LEAs. The LEAs receiving the request have the discretion to choose whether they will honor the request. If they choose to honor the request, the LEA sharing the information removes names of students who have opted out of such data sharing, then sends the data to the requesting LEA.

Requires a change to Board rule or statute: No.

Pros

- Allows LEAs to honor parent requests to opt out of sharing directory information
- Allows LEAs to honor nuances in directory information uses (*e.g., specifying that directory information will only be used for specific purposes, decline to provide data elements that they have not designated as directory information*)
- Allows LEAs to continue choosing what information they designate as directory information

Cons

- Burden on LEAs that receive the requests; potentially receive requests from dozens of other LEAs
- Burden on requesting LEAs; must contact multiple LEAs
- Requesting LEA may not receive requested information because LEAs are not required to share

Method 1.1 (Current): LEAs choose whether to share family contact information with a requesting LEA.

Financial Impact:

	Notes	Cost	
		One-time	Annual Recurring
SIS Vendor Development	None. Directory information opt out fields already exist in SISs.	\$0	\$0
LEA Staff Work Hours	No required work hours. Any additional work is up to local discretion.	\$0	\$0
Total LEA Cost		\$0	\$0
USBE Development	No development required.	\$0	\$0
USBE Non-Development Work Hours	No USBE work hours required.	\$0	\$0
Total USBE Cost		\$0	\$0
Total		\$0	\$0

Option 2: USBE shares family contact information with requesting LEAs in accordance with FERPA's directory information exception

Summary: Upon request from an LEA, USBE would provide contact information for families. Prior to sharing, USBE would remove the information for students that had opted out sharing directory information and would provide the information of the remaining families to the requesting charter school.

Currently, USBE does not know which students have opted out of sharing directory information, so this option would require USBE to begin collecting information from LEAs about which students have opted out of sharing directory information. It would also require USBE to mandate that all LEAs designate certain information as directory information.

Requires a change to Board rule or statute: Yes. A Board rule change would be required to indicate that LEAs must report an additional data element (directory information opt out indicator) to USBE. Additionally, a change to Board rule would be required to mandate that all LEAs designate certain information (name and mailing address) as directory information.

Pros

- Reduces burden on requesting charter schools; a single request would provide all the info they need
- Request would be guaranteed to be fulfilled

Cons

- Potential concern from parent community
- Prevents LEAs from acquiring more granular parent consent (*e.g., indicating that they do want their student's information in the yearbook, but not on the class website*)
- Requires USBE to collect new data element (directory information opt out indicator) from LEAs
- Requires all LEAs to designate family contact information as directory information. Currently, many LEAs choose to not include addresses in what they consider to be directory information.

Method 2.1: LEAs share directory information opt out indicator with USBE via UTREx collection

Financial Impact:

	Notes	Cost	
		One-time	Annual Recurring
SIS Vendor Development	<p><i>Note: Staff did not hear back from external SIS vendors to receive an estimate, so we used development costs for Aspire to project potential costs of other eight SIS vendors in use in Utah.</i></p> <ul style="list-style-type: none"> SIF agent development in eight external SISs (\$1760 each, \$14,080 total) 	\$14,080	\$0
LEA Staff Work Hours	<ul style="list-style-type: none"> One-time required work hours would range between 10 and 200 hours per LEA. LEAs that expect a high number of work hours explained that this option would require extensive meetings with LEA leadership and others to understand how to accomplish and publicize this, as well as to put people in place to process requests. At \$50/hour in total compensation costs, the one-time cost per LEA would range between \$500 and \$10,000, with a total range between \$78,000 and \$1,560,000 for all 156 LEAs. Annually, USBE staff estimate that each LEA would spend about 2 hours receiving training and maintaining connection. At \$50/hour in total compensation costs, the annual cost per LEA would be \$100 per LEA, with a total cost of \$15,600 for all 156 LEAs. 	\$78,000 - \$1,560,000	\$15,600
Total LEA Cost		\$92,080 – \$1,574,080	\$15,600
USBE Development	<ul style="list-style-type: none"> Daily UTREx Collections with Directory Opt-out indicator (\$17,600) 	\$19,360	\$0

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	<ul style="list-style-type: none"> SIF agent development in Aspire SIS (\$1760) 		
USBE Non-Development Work Hours	<ul style="list-style-type: none"> Setting up validations (coding, testing, and communicating to every LEA at least three times a year) Update UTREx specifications Write script for honoring requests Annually training LEAs (5 times a year) Annual courtesy reviews (3 times a year) Annually Receiving and honoring requests from LEAs 	\$20,000	\$10,000
Total USBE Cost		\$39,360	\$10,000
Total		\$131,440 - \$1,613,440	\$25,600

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Method 2.2: LEAs share information about which students have opted out of directory information with USBE via another method (e.g., spreadsheet upload)

Financial Impact:

	Notes	Cost	
		One-time	Annual Recurring
SIS Vendor Development	No expected development costs.	\$0	\$0
LEA Staff Work Hours	<ul style="list-style-type: none"> One-time required work hours would range between 10 and 200 hours per LEA. LEAs that expect a high number of work hours explained that this option would require extensive meetings with LEA leadership and others to understand how to accomplish and publicize this, as well as to put people in place to process requests. At \$50/hour in total compensation costs, the one-time cost per LEA would range between \$500 and \$10,000, with a total range between \$78,000 and \$1,560,000 for all 156 LEAs. Annually, USBE staff estimate that each LEA would spend about 5 hours receiving training, compiling their list of directory information opt outs, and sending their list to USBE. At \$50/hour in total compensation costs, the annual cost per LEA would be \$250 per LEA, with a total cost of \$39,000 for all 156 LEAs. 	\$78,000 - \$1,560,000	\$39,000
Total LEA Cost		\$78,000 - \$1,560,000	\$39,000
USBE Development	No development required.	\$0	\$0
USBE Non-Development Work Hours	<ul style="list-style-type: none"> Hire ½ FTE, establish process (\$40,000) Annually collect, store, clean, verify, and match information from LEAs (\$30,000) 	\$40,000	\$40,000

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	<ul style="list-style-type: none"> Annually Receiving and honoring requests from LEAs (\$10,000) 		
Total USBE Cost		\$40,000	\$40,000
Total		\$118,000 - \$1,600,000	\$79,000

Option 3: USBE shares family contact information with requesting LEAs for families who have granted consent

Summary: LEAs would inform parents of the option to share contact information for the purpose of receiving information about other schools, and parents would indicate whether they consent to the sharing of their contact information. LEAs would likely choose to make this notification and collect parent consent during the registration process.

Upon request from an LEA, USBE would provide the LEA with the contact information from families that had consented to the data sharing.

Requires a change to Board rule or statute: Yes. A Board rule change would be required to indicate that LEAs must report an additional data element (parent consent indicator) to USBE.

Pros

- Provides parents choice and transparency on what they are agreeing to
- Allows LEAs to acquire more granular parent consent (e.g., indicating that they do want their student's information in the yearbook, but not on the class website)
- Allows LEAs to continue choosing what information they designate as directory information

Cons

- Requires USBE to collect new data element (parent consent indicator) from LEAs
- Disruptive to LEA current processes; adds additional length and complexity to LEA registration process

Method 3.1: LEAs collect parent consent indicator and share with USBE via UTREx

Financial Impact:

	Notes	Cost	
		One-time	Annual Recurring
SIS Vendor Development	<p><i>Note: Staff did not hear back from external SIS vendors to receive an estimate, so we used development costs for Aspire to project potential costs of other eight SIS vendors in use in Utah.</i></p> <ul style="list-style-type: none"> • Development of registration page in each SIS (\$3520 each, \$28,160 total) • Development of enrollment page in each SIS (\$3520 each, \$28,160 total) • SIF agent development in each SIS (\$1760 each, \$14,080 total) 	\$70,400	\$0
LEA Staff Work Hours	<ul style="list-style-type: none"> • One-time required work hours would range between 15 and 200 hours per LEA. This work would include redesigning and retraining staff on the updated registration process. LEAs that expect a high number of work hours explained that this option would require extensive meetings with LEA leadership and others to understand how to accomplish and publicize this, as well as to put people in place to process requests. At \$50/hour in total compensation costs, the one-time cost per LEA would range between \$750 and \$10,000, with a total range between \$117,000 and \$1,560,000 for all 156 LEAs. • Annually, USBE staff estimate that each LEA would spend about 2 hours receiving training and maintaining connection. At \$50/hour in total compensation costs, the annual cost per LEA would be \$100 per LEA, with a total cost of \$15,600 for all 156 LEAs. 	\$117,000 – \$1,560,000	\$15,600

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Total LEA Cost		\$187,400 – \$1,630,400	\$15,600
USBE Development	<ul style="list-style-type: none"> • Daily UTREx collection of new Consent Indicator (\$17,600) • Development of registration page in Aspire (\$3520) • Development of enrollment page in Aspire (\$3520) • SIF agent development in Aspire SIS (\$1760) 	\$26,400	\$0
USBE Non-Development Work Hours	<ul style="list-style-type: none"> • Setting up validations (coding, testing, and communicating to every LEA at least three times a year) • Update UTREx specifications • Write script for honoring requests • Annually training LEAs (5 times a year) • Annual courtesy reviews (3 times a year) • Annually Receiving and honoring requests from LEAs 	\$20,000	\$10,000
Total USBE Cost		\$46,400	\$10,000
Total		\$233,800 – \$1,676,800	\$25,600

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Method 3.2: LEAs collect parent consent indicator and share with USBE via another method (e.g., spreadsheet upload)

Financial Impact:

	Notes	Cost	
		One-time	Annual Recurring
SIS Vendor Development	<p><i>Note: Staff did not hear back from external SIS vendors to receive an estimate, so we used development costs for Aspire to project potential costs of other eight SIS vendors in use in Utah.</i></p> <ul style="list-style-type: none"> • Development of registration page in each SIS (\$3520 each, \$28,160 total) • Development of enrollment page in each SIS (\$3520 each, \$28,160 total) • Development of report each in each SIS (\$1760 each, \$14,080 total) 	\$70,400	\$0
LEA Staff Work Hours	<ul style="list-style-type: none"> • One-time required work hours would range between 15 and 200 hours per LEA. This work would include redesigning and retraining staff on the updated registration process. LEAs that expect a high number of work hours explained that this option would require extensive meetings with LEA leadership and others to understand how to accomplish and publicize this, as well as to put people in place to process requests. At \$50/hour in total compensation costs, the one-time cost per LEA would range between \$750 and \$10,000, with a total range between \$117,000 and \$1,560,000 for all 156 LEAs. • Annually, USBE staff estimate that each LEA would spend about 5 hours receiving training, compiling their list of students with parent consent, and sending their list to USBE. At \$50/hour in total compensation costs, the annual cost per LEA would be \$250 	\$117,000 and \$1,560,000	\$39,000

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	per LEA, with a total cost of \$39,000 for all 156 LEAs.		
Total LEA Cost		\$187,400 – \$1,630,400	\$39,000
USBE Development	<ul style="list-style-type: none"> • Development of table and reporting for LEA files (\$4,400) • Development of registration page in Aspire (\$3520) • Development of enrollment page in Aspire (\$3520) • Development of Aspire report (\$1760) 	\$13,200	\$0
USBE Non-Development Work Hours	<ul style="list-style-type: none"> • Hire ½ FTE, establish process (\$40,000) • Annually collect, store, clean, verify, and match information from LEAs (\$30,000) • Annually Receiving and honoring requests from LEAs (\$10,000) 	\$40,000	\$40,000
Total USBE Cost		\$53,200	\$40,000
Total		\$240,600 – \$1,683,600	\$79,000

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Option 4: Massachusetts model

Summary: All LEAs would annually provide family contact information to a third-party mail house. When an LEA wanted to send out materials, they would contact the mail house, who would send the materials on their behalf. The mail house would be paid by each LEA that chooses to send out materials.

Requires a change to Board rule or statute: Yes. A Board rule change would be required to mandate LEAs share family contact information annually to the mail house.

Pros

- Reduces burden on requesting LEAs; a single request would provide all the info they need
- Request would be guaranteed to be fulfilled
- Prevents the actual transfer of student data between LEAs
- Allows LEAs to honor parent requests to opt out of sharing directory information
- Allows LEAs to honor nuances in directory information uses (e.g., *specifying that directory information will only be used for specific purposes, decline to provide data elements that they have not designated as directory information*)
- Allows LEAs to continue choosing what information they designate as directory information

Cons

- Data is in possession of a third-party
- Adds a burden to LEAs to provide student data to mail house each year
- Requires USBE to contract with a third-party mail house

Financial Impact:

Due to lack of support for this option, this option is no longer being considered. As such, staff has not assessed the financial impact of this option.

Option 5: Upon request, LEAs are required to share family contact information with requesting LEA.

Summary: This option is similar to Option 1, except that LEAs would be *required* to share family contact information upon request. LEAs would request family contact information from other LEAs, and the LEAs receiving the request will be required to honor the request. The LEA sharing the information will remove the names of students who have opted out of such data sharing, then send the data to the requesting LEA.

Requires a change to Board rule or statute: Yes.

Pros

- Allows LEAs to honor parent requests to opt out of sharing directory information
- Prevents USBE from needing to collect directory information opt out status of students
- Ensures that requesting LEAs can obtain family contact information

Cons

- Requires LEAs to designate family contact information as directory information. Currently, many LEAs choose to not include addresses in what they consider to be directory information.
- Burden on LEAs that receive the requests; potentially receive requests from dozens of other LEAs
- Burden on requesting LEAs; must contact multiple LEAs
- Removes LEAs discretion as to whether to share directory information

Method 5.1: Upon request, LEA shares family contact information with the requesting LEA, likely via spreadsheet.

Financial Impact:

	Notes	Cost	
		One-time	Annual Recurring
SIS Vendor Development	<p><i>Note: Staff did not hear back from external SIS vendors to receive an estimate, so we used development costs for Aspire to project potential costs of other eight SIS vendors in use in Utah.</i></p> <ul style="list-style-type: none"> • New consent collection? Or just include in directory information opt out? <p>If LEAs use directory information opt outs to determine which data to share, no additional development cost would be required.</p> <p>Some LEAs indicated that instead of sharing according to directory information exception, they would collect parent consent; the costs of this are outlined below.</p> <ul style="list-style-type: none"> • Registration page to collect parent consent in each SIS (\$3520 each, \$28,160 total) • Enrollment page to collect parent consent in each SIS (\$3520 each, \$28,160 total) 	\$0 – \$56,320	\$0
LEA Staff Work Hours	<ul style="list-style-type: none"> • One-time required work hours would range between 10 and 200 hours per LEA. LEAs that expect a high number of work hours explained that this option would require extensive meetings with LEA leadership and others to understand how to accomplish and publicize this, as well as to put people in place to process requests. At \$50/hour in total compensation costs, the one-time cost per LEA would range between \$500 and \$10,000, with a total range between \$78,000 and \$1,560,000 for 	\$78,000 – \$1,560,000	\$0 - \$1,946,880

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	<p>all 156 LEAs.</p> <ul style="list-style-type: none"> Annually, USBE staff estimate each request made or received could take up to 2 hours of LEA staff time. Most LEAs will likely make or receive only a few requests a year, while others will make or receive many requests. If an LEA makes or receives a request for half of the LEAs across the state (78), this would take 156 work hours. At \$50/hour in total compensation costs, the annual cost per LEA would range between \$0 and \$12,480, with a total cost of between \$0 and \$1,946,880 for all 156 LEAs. 		
Total LEA Cost		\$78,000 – \$1,616,320	\$0 - \$1,946,880
USBE Development	<p>If LEAs use directory information opt outs to determine which data to share, no additional development cost would be required.</p> <p>Some LEAs indicated that instead of sharing according to directory information exception, they would collect parent consent; the costs of this are outlined below.</p> <ul style="list-style-type: none"> Registration page in Aspire to collect parent consent (\$3520) Enrollment page in Aspire to collect parent consent (\$3520) 	\$0 – \$7,040	\$0
USBE Non-Development Work Hours	None	\$0	\$0
Total USBE Cost		\$0 – \$7,040	\$0
Total		\$78,000 – \$1,623,360	\$0 - \$1,946,880

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Option 6: USBE collects parent consent directly from parents and shares with requesting LEAs

Summary: Rather than USBE collecting parent consent indicators from an LEA, USBE would collect parent consent directly from parents via a new system (likely a Qualtrics form).

Requires a change to Board rule or statute: No.

Pros

- Provides parents choice and transparency on what they are agreeing to
- Reduces burden on requesting LEAs; a single request would provide all the info they need
- Request would be guaranteed to be fulfilled
- Prevents the actual transfer of student data between LEAs

Cons

- Responsibility of who would notify parents of this form is unclear
- Likely only a small number of parents would provide information, unless well advertised
- USBE lacks ability to verify parent identity, so a non-parent could potentially submit contact information for another family
- Increased burden on USBE staff to develop and maintain a new system
- Data quality issues; relying on form submissions to be entered accurately

Method 6.1: USBE collects parent opt in indicator directly from parents via form maintained by USBE

Parents who wished to have their contact information shared for the purpose of advertising school options would visit a form hosted by USBE. Parents would indicate their consent and enter the information necessary for USBE staff to conduct a data match to our systems. This information may include the parent name, student(s) name(s), student grade level(s), and other relevant information necessary to conduct a data match.

Upon request from an LEA, USBE would conduct a data match between the parent consent form information and the mailing address information we have in our databases.

Financial Impact:

	Notes	Cost	
		One-time	Annual Recurring
SIS Vendor Development	No development required.	\$0	\$0
LEA Staff Work Hours	<ul style="list-style-type: none"> Staff estimates that LEAs would spend about 4 hours annually notifying families of the form. At \$50/hour in total compensation costs, the annual cost per LEA would be about \$200, with a total cost of \$31,200 for all 156 LEAs. 	\$0	\$31,200
Total LEA Cost		\$0	\$31,200
USBE Development	<ul style="list-style-type: none"> Development of parent consent form webpage, with parent login feature and data matching (\$44,000) Annual Developer Support/ Maintenance (\$2640) Annual Dedicated Web Server Cost (\$6720) 	\$44,000	\$9,360
USBE Non-Development Work Hours	<ul style="list-style-type: none"> Annually provide minimal LEA training, receive and honor requests from LEAs (\$5,000) 	\$0	\$5,000
Total USBE Cost		\$44,000	\$14,360

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Total		\$44,000	\$45,560
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Method 6.2: Collect parent opt in indicator *and* contact information directly from parents via form maintained by USBE

Parents who wished to share contact information for the purpose of learning about school options would visit a form hosted by USBE. Parents would indicate their consent and enter into the form all the information a requesting LEA would need to know, such as parent name, mailing address, student grade level(s), and other relevant information. This information would be stored by USBE in a database separate from primary databases.

Upon request from an LEA, USBE would provide the LEA with the information parents had submitted via the form. This method would require no data matching.

Financial Impact:

	Notes	Cost	
		One-time	Annual Recurring
SIS Vendor Development	No development required.	\$0	\$0
LEA Staff Work Hours	<ul style="list-style-type: none"> Staff estimates that LEAs would spend about 4 hours annually notifying families of the form. At \$50/hour in total compensation costs, the annual cost per LEA would be about \$200, with a total cost of \$31,200 for all 156 LEAs. 	\$0	\$31,200
Total LEA Cost		\$0	\$31,200
USBE Development	No development required.	\$0	\$0
USBE Non-Development Work Hours	<ul style="list-style-type: none"> Contract with Qualtrics consultants to develop solution, set up form (\$20,000-\$50,000) Annually maintain Qualtrics form, honor LEA requests (\$10,000) 	\$20,000 - \$50,000	\$10,000
Total USBE Cost		\$20,000 - \$50,000	\$10,000
Total		\$20,000 - \$50,000	\$41,200

Option 7: USBE hosts a website with school choice information, such as fliers from each LEA.

Summary: In lieu of sharing family contact information, USBE maintains a publicly-viewable web space for families to access LEA advertisement documents, such as fliers. LEAs would submit their materials to USBE to be displayed on the website.

Requires a change to Board rule or statute: Yes. A Board rule would direct staff to create and maintain the page.

Pros

- Prevents the need for sharing family contact information while still allowing LEAs to advertise their schools and programs

Cons

- Responsibility of who would notify parents of this webpage is unclear
- Information about this webpage would likely not reach all families

Method 7.1: LEAs submit advertising information about their schools and programs to USBE, which are posted on a public website.

Financial Impact:

	Notes	Cost	
		One-time	Annual Recurring
SIS Vendor Development	No development required.	\$0	\$0
LEA Staff Work Hours	<ul style="list-style-type: none"> Staff estimate it would take about 6 hours to create and submit each flier annually. If each LEA submitted one flier, at \$50/hour in total compensation costs, the annual cost per LEA would be \$300, for a total of \$46,800 for all 156 LEAs. If no LEAs submit a flier, the total cost would be zero, thus a range from \$0 - \$46,800. 	\$0	\$0 - \$46,800
Total LEA Cost		\$0	\$0 - \$46,800
USBE Development	No development required.	\$0	\$0
USBE Non-Development Work Hours	<ul style="list-style-type: none"> A webpage that simply displayed LEA information would take approximately 10 hours for staff to develop and would have no additional hosting or development cost. A page that would allow viewers to filter results by zip code would likely require one-time custom development by USBE's website hosting platform, Modern Campus (\$15,000) Annually, 1/8 FTE to collect, vet and post LEA materials (\$13,000) 	\$15,000	\$13,000
Total USBE Cost		\$15,000	\$13,000
Total		\$15,000	\$13,000 - \$59,800

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 For discussion in the December 8, 2023 Law and Licensing Committee Meeting
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