



PPRA Notice And Consent/Opt-Out for Specific Activities

Propel Schools recognizes the privacy rights of parents and students in the conduct of student surveys for educational purposes, collection and use of information for marketing purposes and certain physical exams. To this end, Propel Schools supports the use of appropriate surveys in accordance with the guidelines contained in this policy and as determined appropriate by the school administration.

Surveys to obtain student opinions and information about students shall be conducted anonymously and in an unobtrusive manner, and shall not result in identifying participating individuals. Surveys shall be administered and used in accordance with state and federal laws.

Propel Schools shall obtain prior written consent from parents and students over the age of 18 or emancipated minors (“eligible students”) before students are required to submit to a survey that concerns one or more of the eight protected areas listed below (“protected information surveys”) when the survey is funded in whole or in part by a program of the U.S. Department of Education.

1. Political affiliations or beliefs of the student or student’s parent;
2. Mental or psychological problems of the student or student’s family;
3. Sexual behavior or attitudes;
4. Illegal, anti-social, self-incriminating, or demeaning behavior;
5. Critical appraisals of others with whom respondents have close family relationships;
6. Legally recognized privileged relationships, such as with lawyers, doctors, or ministers;
7. Religious practices, affiliations, or beliefs of the student or parents; and
8. Income, other than as required by law to determine program eligibility

When protected information surveys are funded by other sources, parents and eligible students shall be notified in writing that such survey is to be administered and be provided the opportunity to opt the student out of the survey.

Parents and eligible students shall also receive notice and an opportunity to opt a student out of any non-emergency, invasive physical exam or screening that is 1) required as a condition of attendance, 2) administered by the school and scheduled by the school in advance, and 3) not necessary to protect the immediate health and safety of the student, or of other students. An “invasive physical examination” is any medical examination that involves the exposure of private body parts, or any act during such examination that includes incision, insertion or injection into the body, but does not include a hearing, vision, or scoliosis screening. This provision does not apply to any physical examination or screening that is permitted without parental notification.

Finally, parents and eligible students shall also receive notice and an opportunity to opt a student out of activities involving collection, disclosure, or use of personal information collected from students for the purpose of marketing or for selling that information, or otherwise providing that information to others for that purpose.

“Personal information” is information that identifies the student such as a student’s or parent’s first and last name, a home or other physical address, a telephone number, and a social security number.

Parents and eligible students have rights to access certain information. They may review, upon request and before administration or use, any survey that concerns one or more of the eight protected areas, any instructional materials used in connection with any survey that concerns one or more of the eight protected areas, and any instructional material used as part of the educational curriculum for the student. “Instructional material” is instructional material that is provided to a student, regardless of format, including printed or representational materials, audio-visual materials, and materials in electronic or digital format, but does not include academic tests or academic assessments. Parents may also inspect any instruments used to collect personal information from students for any marketing, sales or other distribution purposes.

The administration shall directly notify parents and eligible students of policies concerning student surveys at least annually at the start of each school year and after any substantive changes. The administration shall also directly notify parents and eligible students, such as through U.S. Mail or email, at least annually at the start of each school year of the specific or approximate dates of the following activities and provide an opportunity to opt a student out of participating in:

- Collection, disclosure, or use of personal information for marketing, sales or other distribution
- Administration of any protected information survey not funded in whole or in part by the U.S. Department of Education
- Any non-emergency, invasive physical examination or screening as described above

Parents/eligible students who believe their rights have been violated may file a complaint with:

Propel Schools Pupil Services Coordinator

or

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202-4605