

Cybersecurity Posture Report

Combined — 18 Assessments
Compliance Report

CLIENT

District 101

Assessments Combined: 18

Total Findings: 203

Generated: 2026-06-30

COMPLIANCE STATUS

14 gaps

of 24 requirements

8 partial · 2 no gap found

EXAMPLE
FICTIONAL REFERENCE DISTRICT — NOT REAL DATA

REGULATORY COMPLIANCE CROSSWALK

This crosswalk maps District 101's assessment findings against the core student-data regulations that apply to K-12 districts — FERPA, COPPA, CIPA, and state breach-notification law.

Status is a gap analysis derived from this assessment, not a legal determination of compliance. "Gap" and "Partial" indicate an open finding touching the requirement; "No gap found" means the assessment did not flag that area. Consult counsel for a formal compliance opinion.

24 REQUIREMENTS	14 GAPS	8 PARTIAL	2 NO GAP FOUND
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FERPA 34 CFR Part 99

Annual notification of rights 34 CFR §99.7 District issues an annual notice to parents and eligible students of their rights to inspect, amend, and consent to disclosure of education records, and how to file a complaint. GAP EVIDENCE Annual FERPA Notification	GAP
Right to inspect and review records 34 CFR §99.10 A documented process lets parents/eligible students inspect education records within 45 days of request. EVIDENCE No gap identified in this assessment.	NO GAP FOUND
Right to request amendment 34 CFR §99.20 A process exists for parents/eligible students to request amendment of inaccurate records and to a hearing if denied. GAP EVIDENCE Opt-Out and Data Deletion Handling; Data Subject Access Request Fulfillment	GAP
Consent prior to disclosure of PII 34 CFR §99.30 Written consent is obtained before disclosing personally identifiable information from education records, except where an exception applies. GAP EVIDENCE Parental Consent Mechanisms; Third-Party Disclosure Controls & School Official Agreements	GAP
Legitimate educational interest / school officials 34 CFR §99.31(A)(1) Access to records is limited to officials with a defined legitimate educational interest, and that standard is documented and enforced. GAP EVIDENCE Vendor Access Controls and Least Privilege; Electronic Access Control System; Application Access Controls	GAP

Third-party / outsourced service providers

GAP

34 CFR §99.31(A)(1)(I)(B)

Vendors acting as school officials are under direct control, use data only for authorized purposes, and are bound by a data agreement.

GAP EVIDENCE

Data Processing Agreements; Third-Party Disclosure Controls & School Official Agreements; Data Processing Agreements & Student Data Contracts

Recordkeeping of disclosures

NO GAP FOUND

34 CFR §99.32

A record of disclosures of education records is maintained and available to parents/eligible students.

EVIDENCE

No gap identified in this assessment.

Directory information designation & opt-out

GAP

34 CFR §99.37

Directory information categories are publicly designated annually with an opt-out mechanism for parents/eligible students.

GAP EVIDENCE

Opt-Out and Data Deletion Handling; Student Data Transparency & Public Reporting

Safeguarding of education records

GAP

34 CFR §99 (SAFEGUARDING)

Reasonable methods and access controls protect education records from unauthorized access or disclosure.

GAP EVIDENCE

Data Access Controls and DLP; Data Minimization & Retention for Student Data; Student Data Transparency & Public Reporting

Unauthorized disclosure & breach handling

PARTIAL

34 CFR §99.67 / GUIDANCE

Procedures address unauthorized disclosure of education records, including containment, notification, and re-disclosure prohibitions.

GAP EVIDENCE

FERPA Breach & Unauthorized Disclosure Procedures

COPPA 16 CFR Part 312

EdTech inventory & COPPA applicability

PARTIAL

16 CFR §312 (APPLICABILITY)

A maintained inventory identifies EdTech tools that collect data from children under 13 and assesses COPPA applicability before adoption.

GAP EVIDENCE

EdTech App Inventory & COPPA Applicability Assessment

Notice & school-authorized consent

PARTIAL

16 CFR §312.4

Operators provide direct notice of data practices; the district vets tools and provides school consent only within COPPA limits.

GAP EVIDENCE

EdTech Procurement & Review Process

Verifiable parental consent

GAP

16 CFR §312.5

Where school consent is not sufficient, verifiable parental consent is obtained before collection from children under 13.

GAP EVIDENCE

Parental Consent Mechanisms

Data minimization for children

GAP

16 CFR §312.7

Collection from children is limited to what is reasonably necessary for the educational activity.

GAP EVIDENCE

Data Minimization & Retention for Student Data; Sensitive Data Handling and Minimization

Retention & deletion of children's data

GAP

16 CFR §312.10

Children's data is retained only as long as necessary and securely deleted thereafter.

GAP EVIDENCE

Opt-Out and Data Deletion Handling; Data Minimization & Retention for Student Data; Backup Frequency and Retention

Third-party disclosure & vendor limits

GAP

16 CFR §312.8

Vendor agreements limit use and disclosure of children's data and require reasonable security.

GAP EVIDENCE

Data Processing Agreements; Vendor Access Controls and Least Privilege; Vendor Criticality and Concentration Risk

CIPA 47 U.S.C. §254(h)

Internet safety policy adopted

PARTIAL

47 U.S.C. §254(H)

A board-adopted internet safety policy is in place and was subject to public notice and hearing.

GAP EVIDENCE

Internet Safety Policy

Technology protection measures (filtering)

PARTIAL

47 CFR §54.520

Content filtering blocks obscene material, child pornography, and material harmful to minors on district devices and networks.

GAP EVIDENCE

Technology Protection Measures & Content Filtering

Monitoring of minors' online activity

PARTIAL

47 U.S.C. §254(H)(L)

The district monitors minors' online activity consistent with its internet safety policy.

GAP EVIDENCE

Continuous Security Posture Monitoring; Backup Monitoring and Alerting

Education on appropriate online behavior

PARTIAL

PROTECTING CHILDREN 21ST CENTURY ACT

Students are educated on appropriate online behavior, including social media interaction and cyberbullying awareness.

GAP EVIDENCE

Acceptable Use Policy — Students & Staff

State Breach State law

Breach notification procedure

GAP

STATE BREACH-NOTIFICATION STATUTE

A documented procedure defines what triggers notification and how a breach of personal information is handled.

GAP EVIDENCE

State Breach Notification Compliance; Regulatory Breach Notification Obligations; Incident Response & Breach Notification

Statutory notification timelines

GAP

STATE STATUTE (TIMELINES)

Notification timelines, required recipients (individuals, AG, parents), and notice content meet the applicable state statute.

GAP EVIDENCE

State Breach Notification Compliance

State student-privacy law applicability

PARTIAL

STATE PRIVACY / SOPIPA-TYPE LAW

Applicable state student-data-privacy laws are inventoried and mapped to district obligations.

GAP EVIDENCE

State Privacy Law Inventory & Applicability Assessment

Incident response integration

GAP

IRP INTEGRATION

Breach notification is integrated into the incident response plan with assigned roles and tested procedures.

GAP EVIDENCE

Incident Response Plan (IRP); Incident Response Plan Existence and Quality; Incident Response Team Structure and Roles