

On Wednesday, April 29, 2020 10:04 AM, xxxxx@cde.state.co.us wrote:

Hello Ms. Kiesecker,

Thank you for following up. College Board provided the information below, late Tuesday afternoon. It is important to note that the Colorado Department of Education does not have a contract with College Board for AP exams, but per your request, we reached out to College Board for this information.

Questions:

- Will the College Board or third parties be collecting student device information, IP address, geo-location?
 - In order to protect the integrity of test security, we cannot provide detailed information; however, we can confirm that AP exams will be administered on College Board's platform, except in limited circumstances for a few courses where ETS will provide operational support. Except in these limited circumstances with ETS, College Board will not share any information with third parties about student's use of the platform. Further, College Board shall only collect and retain information that is necessary to ensure the security and integrity of test administration.
- Will the College Board be using security technologies that require students to have their camera turned on?
 - Our security technologies will not require students to have their cameras turned on to take the AP exam; however, if students opt to handwrite rather than type their exam responses, students will need to use the camera on their smartphone, tablet, or computer to photograph, attach, and submit their exam responses.
- Will College Board track where students click or websites students visit?
 - In order to protect the integrity of test security, we cannot provide detailed information; however, we can confirm that we are not developing any student profiles and/or sharing any information with third parties (except as noted above with ETS).
- What data elements will College Board collect from the online AP test and for what purpose?
 - In order to process the student's AP exam (to take the test, to score the test), College Board will collect the following: AP ID (an 8-character unique student identifier that appears on the students e-ticket), first and last name, date of birth, and email address. Students will be asked to select from a drop-down menu where they are taking their exam: home, school or other. We cannot provide additional details in order to protect the integrity of test security.

- What third parties or subcontractors will have access to student data and for what purpose?
 - There are no changes from our standard operating procedure here, as always, ETS will have access to student responses and data to support the administration of certain AP exams and to assist in the scoring for AP. ETS will have access to: AP ID, first and last name, date of birth, and email address, and whether a student is testing with an accommodation (as noted below in order to support the administration of certain AP exams and to assist with scoring).
- What portion of the test will be machine graded?
 - No portion of the test will be machine graded.
- Additionally, for students with disability accommodations, such as extended time, will College Board track the time that a student spends taking the test, and will the time be disclosed to any third party or colleges? (Sharing or identifying children with extended time accommodations would inappropriately flag these students as having a disability.)
 - Students with approved extended time accommodations will automatically be given that time; we will not be tracking how much of that extended time a student uses. College Board's policy on disclosing use of an accommodation does not change for the AP exam. Colleges do not know whether a student has tested with an accommodation.
- Specifically, what third parties or subcontractors will have access to student disability status and why? Who can see the student's [SSD](#)?
 - College Board's policy on disclosing use of an accommodation does not change for the AP exam. Except for ETS as part of its work to support the administration of certain AP exams and to assist with scoring, no third parties know whether a student has received an accommodation to take the AP exam.

Colorado Department of Education

Data Privacy & Security Trainer Information Management Services

www.cde.state.co.us

From: Cheri Kiesecker

Sent: Tuesday, April 28, 2020 3:25 PM

To: Colorado Board of Education; Colorado Department of Education Data Privacy

Subject: Re: Online AP test- Privacy and Terms of Service

Good afternoon,

I am following up from my request 10 days ago. With students scheduled to take the online AP exams beginning May 11, we have a very short window (*about a week*) to inform parents and educators of how College Board intends to collect and share student data in these first-ever, at home, online tests. Colorado law requires school services providers to detail data elements collected, how used, for what purpose, and which subcontractors have access to these data elements-- and schools must also post this information. On March 20, 2020, College Board announced they were administering AP tests online; their attorneys have had well over a month to update their privacy policy and ensure they are in compliance with state and federal laws.

Thank you for your help and I hope we have answers soon, before students are slated to take these online tests.

Best,

Cheri Kiesecker

On Sunday, April 19, 2020 12:20 PM, Cheri Kiesecker wrote:

Good afternoon Board and Ms. Peterson,

Because of Covid19 shutdowns, students will be taking AP tests online from their home devices. I am hoping you can help; I cannot find College Board's updated privacy policy or updated Terms of Service that reflect how the College Board will collect and process student data from the **online** AP tests. The College Board lists the following [Program Specific Privacy Policies](#) but currently, none address my questions or the fact that AP tests will be conducted online.

[Bulletin for AP Students and Parents: 2019-20 AP Implementation \(.pdf/590 KB\)](#)

[Bulletin for AP Students and Parents 2019-20: California Supplement \(.pdf/378 KB\)](#)

[Terms of Service for My AP \(.pdf/200 KB\)](#)

A few questions I would like the College Board to address specific to the online AP tests:

1. Will the College Board or third parties be collecting student device information, IP address, geo-location?
2. Will the College Board be using security technologies that require students to have their camera turned on?
3. Will College Board track where students click or websites students visit?
4. What data elements will College Board collect from the online AP test and for what purpose?
5. What third parties or subcontractors will have access to student data and for what purpose?
6. What portion of the test will be machine graded?
7. Additionally, for students with disability accommodations, such as extended time, will College Board track the time that a student spends taking the test, and will the time be disclosed to any third party or colleges? (Sharing or identifying children with extended time accommodations would inappropriately flag these students as having a disability.)
8. Specifically, what third parties or subcontractors will have access to student disability status and why? Who can see the student's [SSD](#)?

Thank you for your help.

Best,

Cheri Kiesecker, Colorado parent