



State of New Jersey  
DEPARTMENT OF EDUCATION  
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PHILIP D. MURPHY  
Governor

SHEILA Y. OLIVER  
Lt. Governor

ANGELICA ALLEN-MCMILLAN, Ed.D.  
Acting Commissioner

December 13, 2022

Sinead Rundell, Board President  
Glen Rock Board of Education  
620 Harristown Rd.  
Glen Rock, NJ 07452

Dear Ms. Rundell:

SUBJECT: Security of Student Records  
OFAC Case #INV-07-22

The New Jersey Department of Education, Office of Fiscal Accountability and Compliance (OFAC), received a list of concerns from a Borough Glen Rock resident about the Glen Rock Public Schools (District) which includes the following:

**1. District's superintendent's hiring practices and personnel issues**

District personnel matters, unless there is a specific violation of educational statute and/or regulation, should be resolved between the District, as the employer, and the employee with standing, which can typically include bargaining unit representatives.

**2. Violation of District Board of Education (Board) policy**

If the complainant has a belief that a Board member or District administrator did not adhere to Board Policy and violated provisions of the School Ethics Act, the following information is applicable:

The School Ethics Commission (Commission) is limited to enforcing the School Ethics Act (Act), *N.J.S.A. 18A:12-24 et seq.*, a set of minimum ethical standards by which all school officials must abide. If you believe that an individually named *school official* has violated the Act, you may file a Complaint with the Commission within one hundred eighty (180) days of notice of the alleged violation(s). Additional information can be found at: <http://www.nj.gov/education/ethics/>. The Commission's "Q and A" portion is a helpful information tool.

### **3. Teacher certification**

The OFAC did review the teaching certification of the District teacher identified in complainant's list of concerns. That teacher is properly certificated from the Department of Education and is currently receiving instruction at the New Jersey Center for Teaching and Learning (NJCTL), for a certificate of advanced standing in another subject other than his original certification.

The NJCTL's curriculum has been approved by the New Jersey Department of Education and it was confirmed from the NJCTL, the teacher is meeting all the protocols of the NJCTL program to provide instruction of the subject matter identified by the complainant.

### **4. Student data breach**

The complainant stated that during February 2022, student transcripts were posted into the Naviance platform whereby students had the ability to view all the posted student transcripts, as compared to only an individual's transcript.

The provisions of N.J.A.C. 6A:32-7.4 Maintenance and security of student records, reads, in part:

- (a) The chief school administrator, or the chief school administrator's designee, shall be responsible for the security of student records maintained in the school district and shall devise procedures for assuring that access to student records is limited to authorized persons.
- (b) District boards of education may store all student records either electronically or in paper format.
  - 1. When student records are stored electronically, proper security and backup procedures shall be administered.

The data breach was confirmed by the District superintendent, who informed the OFAC investigator that inaccurate student transcripts were inadvertently uploaded to an inactive school counselor's on-line folder and, as a result, viewable on individual student pages.

Therefore, the District did not adhere to the provisions of N.J.A.C. 6A:32-7.4.

Once the District administration was made aware of the data breach (a couple of days after the posting), immediate action was taken to resolve the issue and parents were informed of the matter via an email from the District's Director of Student Personnel Services.

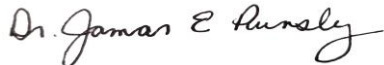
Although the Board, prior to this time, was made aware of the data breach and procedures were implemented to internally correct the matter, the Board is directed to submit a Corrective Action Plan (CAP) identifying the procedures it will develop and implement to ensure compliance with the provisions of N.J.A.C. 6A:32-7.4. Please provide a copy of this report to each member of the Board for review.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Board is required, pursuant to N.J.A.C. 6A:23A-5.6, to publicly review

and discuss the findings in this report at a public board meeting no later than 30 days after receipt of the report. Within 30 days of the public meeting, the board must adopt a resolution certifying that the findings were discussed in a public meeting and approving a CAP to address the issues raised in the findings and/or submit an appeal of any findings in dispute. A copy of the resolution and the approved CAP and/or appeal must be sent to this office within 10 days of adoption by the board. Direct your response to my attention.

Also, pursuant to N.J.A.C. 6A:23A-5.6(c), you must post the findings of this report and the Board's CAP on your District's website. Should you have any questions, please contact Thomas C. Martin, Manager, Investigations Unit, at (609) 376-3606.

Sincerely,



Dr. Jamar E. Purnsley, Director  
Office of Fiscal Accountability and Compliance

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Attachment

c: Paula Bloom  
Michael Yapple  
Louis DeLisio  
Brett Charleston