The following document is from:

Safe and Responsible Use of the Internet: A Guide for Educators

Nancy E. Willard, M.S., J.D.

Part I. Comprehensive Approach

6. Planning and Implementing a Comprehensive Approach

Safe and Responsible Internet Use Planning Committee

Most districts and many schools, have established a technology committee. These committees are the most appropriate committees to also address issues related to the safe and responsible use of the Internet. It is essential that these committees be well-integrated with other key district committees and departments, especially including administration, curriculum, instruction, and library/media. Technology committees should include representatives from all of the major stakeholder groups, including teachers, administrators, technical services, media specialists, secondary students, and parents.

Planning and Policies

Part IV contains a "District Checklist for the Development of a Comprehensive Safe and Responsible Internet Use Plan." This Checklist presents items that should be considered in the development of a comprehensive education and supervision approach.

Modifications to district policies will need to be approved by the district's governing board. Regulations and operational guidelines can be approved in accord with the district process. Since policies and regulations can be extensive and difficult for many to read, informational material may also be developed for dissemination to parents and the community. Part IV contains documents with recommended language for policies, regulations, and informational materials. All of these documents can be downloaded from this site, modified to meet district or school requirements, and distributed.

The materials have been developed to provide for a relatively brief board policy, which contains all necessary elements for compliance with CIPA. The implementation detail is contained in district regulations, which are more easily modifiable by district educators, without the requirement of board consideration. All of these materials may be adapted as necessary to meet the specific operating procedures of individual districts.

Public Disclosure and Information Gathering

CIPA Requirements and FCC Statements Related to Public Disclosure and Information Gathering
CIPA requires the a public notice and a public hearing in the context of the adoption of the Internet Safety Plan:

> PUBLIC NOTICE; HEARING.-- An elementary or secondary school described in clause (i) or the school board, local educational agency, or other authority with responsibility for administration of the school, shall provide reasonable public notice and hold at least one public hearing or meeting to address the proposed Internet safety policy. ...[1]"

Most districts have already met the CIPA requirements of holding a public hearing. However, it is recommended that the district establish a mechanism to provide for ongoing public input and feedback.

In the development of the Regulations for the implementation of CIPA, the FCC requested the submission of public comment. Several commenters sought to persuade the FCC to implement more extensive public disclosure and information gathering requirements than were contained in the law. The FCC declined to implement the recommendations because they were not required under the terms of the law.

Despite the FCC's determination to reject the recommendations made by some of the commentors, the recommendations make good sense for a school district that is seeking to effectively engage the community and to ensure that their approach to addressing the concerns is accountable. Many of the recommendations have merit from the perspective of enhancing effective planning and community relations.

The discussion of these public disclosure and information gathering requirements by the FCC was as follows:

40. After careful review, we decline to require schools and libraries to publicly post the key requirements of CIPA, the text of the written Internet safety policy adopted, the name of the vendor of the technology protection measure chosen, and instructions on registering complaints. We disagree with commenters that suggest that recipients be required to post this material in a public area, preferably near the Internet computers, and on websites when possible. Commenters argue that this mandated disclosure would inform library patrons and parents of school children about the measures taken to protect against illegal or objectionable content, and would assure that the public would assist in monitoring compliance.

41. The plain language of the statute does not require such disclosures. Congress has not specified what information schools and libraries must disseminate to their relevant communities regarding CIPA implementation choices, and the manner in

---

[1] [47 U.S.C. 254 (h)(5)(A)(i)(III)(iii)]

which they must do so. Because the statute does not require these disclosures, we decline to impose additional burdens on schools and libraries[2]."

42. A few commenters propose mandating that all schools and libraries compile and report specific information about the workings of technology protection measures. Under these proposals, entities would be required, for example, to catalogue (in various categories) the number of attempts made to access prohibited visual depictions, the number of times the technology measure succeeded or failed, and the number of instances where "clearly or arguably appropriate and protected material" was inadvertently blocked or restricted. It has also been proposed that we require all recipients to collect any complaints filed by the public, and make these available. Other commenters oppose these various requirements as not mandated by CIPA, overly burdensome to schools and libraries, and potentially violative of statutory privacy rights of students. Because we concur that these data collection and reporting requirements fall outside the requirements of CIPA, we decline to impose such requirements on recipients. As we have stated previously, we are confident that local authorities will take the appropriate steps to ensure that they have complied with CIPA's requirements[3].

Public Disclosure

Appropriate public disclosures about the district's efforts to protect and prepare students to use the Internet in a safe and responsible manner can help alleviate parental and community concerns about use of technology and the Internet. Such disclosures can also help parents understand the need to develop comprehensive strategies to reinforce the safe and responsible use of technology by their children at home. Disclosures can help to mitigate problems by communicating information about the district's good faith efforts, as well as providing honest information about the presence of inappropriate material on the Internet. Districts can also use these disclosures as an opportunity to request further input from the various stakeholders that can be used in evaluating and updating the District's Safe and Responsible Internet Use Plan.

Districts may wish to consider the following disclosures and input mechanisms:

• Posting of the District's Safe and Responsible Internet Use Plan on the district web site, with links to the policy and regulations, and an e-mail input mechanism requesting comments or concerns.

• Provision of a brief description of the District's Safe and Responsible Internet Use Plan to parents, in addition to the Student Safe and Responsible Internet Use Agreement and parental permission form.

Information Gathering and Analysis

---

[2] Federal Communications Commission, *In the Matter of Federal-State Joint Board on Universal Service Children's Internet Protection Act. Report and Order.* April 5, 2001. URL:
http://www.fcc.gov/Bureaus/Common_Carrier/Orders/2001/fcc01120.doc.
[3] FCC Order, supra.

The establishment of a regular process for gathering data and evaluating the effectiveness of the District's Safe and Responsible Internet Use Plan is essential for effective ongoing planning. Technologies are changing rapidly, new concerns will inevitably emerge, and the effectiveness of existing strategies must always be assessed.

The District's Safe and Responsible Internet Use Committee should evaluate the following kinds of data and information on an ongoing basis:

- Data related to student Internet use to assess the degree to which the district's Internet system is being used for quality educational activities. E.g. A periodic analysis of a randomly selected subset of 200 - 400 sites accessed by students during the time when they should be using the Internet for educational activities to determine the number of sites that appear to be educationally relevant, as compared to sites that do not appear to be educationally relevant, would provide significant insight into the degree to which the district's investment in technology is being used for quality educational purposes.

- Reported incidents where students have accidentally accessed inappropriate materials. These reports should be analyzed with respect to determining the content and effectiveness of district instruction in avoiding such accidental access.

- Reported incidents of student or staff violations of the District Internet Use Policy. These reports should be analyzed with respect to determining the patterns of behavior that may need to be addressed through better instruction, supervision, and/or discipline.

- Recommendations or input made to the committee from administrators, teachers, parents, students, and community members.