



# COMMUNITY EDUCATION COUNCIL DISTRICT 3

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**Christine Loughlin**  
District 3 Superintendent

April 6, 2020

Dear Chancellor Carranza,

As the unprecedented interruption in conventional public school operations continues, adjustments and exceptions will be expected at all stakeholder levels. In District 3, Superintendent Loughlin, her team, our Principals, teachers and staff have worked tirelessly to bring our schools back to life. They have performed an exemplary task of managing the circumstances and challenges as they have arisen these last weeks. Parents and parent leaders greatly admire and appreciate their commitment and care during this difficult time.

However, we disagree with the DOE technology use mandates and policy change processes used in the crafting of [Guidance on NYCDOE Video Conferencing](#). This letter outlines why we believe this to be the case and why we ask that you reverse this directive with immediate effect. We also ask you to consider how millions of existing parent, student and teacher technology users of varied skill levels are affected by abrupt, possibly transient, changes in systems.

After the March 15 shutdown announcement, schools were told that they are free to reuse existing software and set up what systems they see fit to make sure teachers and students are able to connect on a daily basis. The DOE asked teachers to very quickly get a functional remote learning daily workflow set up with parents and students at home. If there are rapid-fire mandatory changes, schools will lose engagement with parents, students and even staff users at a time where we cannot afford to do so.

In [Guidance on NYCDOE Video Conferencing](#), we are not told exactly what security and privacy issues are of concern. However we do know that other major institutions of learning, for example [Columbia University Information Technology: Zoom](#), continue to use and work with Zoom to ensure student safety. Also, we know Zoom is making updates in real time to clarify and accommodate educational user concerns as seen in [Best Practices for Securing Your Virtual Classroom](#), [Zoom for K-12 Schools & Districts Privacy Policy](#) and [Zoom and FERPA Compliance](#). **All avenues of change between the DOE and Zoom must be exhausted before the burden of major transition is placed on students, parents and teachers.**

In addition, unless the DOE commits to a strict walled-garden approach to remote learning, they will continue to run into a myriad of student data problems. Email is almost always unencrypted, standard telephone calls are not secure and educational technology websites widely use unencrypted data protocols. Schools all over the city use an array of assignment programs, homework reminder software, scheduling tools and other 3rd party tools on the web. Unique user identification and tracking systems set up by “free” software services for targeted advertising and marketing are extremely sophisticated and difficult to avoid. Personal devices being currently employed for remote learning are of an unknown hardware and software security status.

To definitively address these topics, only DOE provided and controlled hardware and browser software which is appropriately locked down with access to a curated server portal will approach compliance. As you can imagine, this is impossible during this crisis and impractical even in a long term time frame for NYC public school remote learning.

<sup>1</sup> <https://drive.google.com/file/d/1i5JGA6gXP-ajOKBjolvwUsR2ngfEQJPv/view>

<sup>2</sup> <https://cuit.columbia.edu/zoom>

<sup>3</sup> <https://blog.zoom.us/wordpress/2020/03/27/best-practices-for-securing-your-virtual-classroom>

<sup>4</sup> <https://zoom.us/docs/en-us/childrens-privacy.html>

<sup>5</sup> <https://zoom.us/docs/doc/FERPA%20Guide.pdf>

Once any system is widely deployed and in use, as is the case in our schools in the last three weeks, process and technology change management must be taken very seriously and done deliberately. User acquisition, training and retention takes time and has a high dollar and real psychological cost.

At this time, we ask that you value stability over all else. We must not add to the stress of parents, students and staff. We ask that you allow schools and districts to make decisions based on what is best at the community level and do not impose this directive on our already taxed stakeholder groups. This period of challenge is hard enough without this added burden.

Respectfully,

CEC3

Cc:

Executive Superintendent, Manhattan, Marisol Rosales  
District 3 Superintendent Christine Loughlin  
Manhattan Borough President Gale Brewer  
NYC Public Advocate Jumaane Williams  
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