

Classroom Privacy Impact Assessment (C-PIA)

Step-by-Step User Manual

Submission • Review • Approval • Finalization • Publication

Document	C-PIA Step-by-Step User Manual
Audience	Submitters, Assigners, Reviewers, Approvers, Finalizers
Purpose	Provide a simple, consistent guide for completing the C-PIA workflow
Reference	Classroom Privacy Impact Assessment (C-PIA) Process workflow

Version 1.0

1. Quick Start

The C-PIA process is designed to move a classroom resource through a controlled review, approval, finalization, and publication process.

Use this manual to determine what to do at each stage and which role is responsible.

For more detailed information, please refer to: [C-PIA user guide](#) or [Focus Education](#).

2. Roles

Role	Responsibility
Submitter	Submits the C-PIA request and provides the required resource information.
Assigner	Assigns one or more appropriate Reviewers.
Reviewer	Reviews the C-PIA, identifies concerns/flags, and documents findings.
Approver	Reviews the assessment and makes the approval decision.
Finalizer	Documents resolution of flags and records any conditions for use.
Catalogue Administrator / Clerical Support	Completes catalogue information and publication-related administrative tasks, where applicable. (C-PIA system owner/Support)

3. Process Status Reference

Process Status	What It Means
N/A	No active standard C-PIA workflow, or a special catalogue process may apply.
Submitted for Review	The request has been submitted and is ready for Reviewer assignment.
Assigned	One or more Reviewers have been assigned.
Reviewed	The Reviewer has completed the review stage.
Submitted to Approver	The request is ready for an approval decision.
Submitted for Finalization	Approval has been completed and final documentation is required.
Finalized	Finalization is complete and the resource can proceed to the appropriate catalogue/publication process.

4. Practical Start Guide

Part 1 – Quick Start

1. The Core C-PIA Workflow

Think of the process as a relay race. A resource moves through 6 stages: **Submit → Assign → Review → [Additional Review] → Approve → Finalize → Publish**

2. Role & Task Matrix (Find Your Role)

Please jump directly to the corresponding section based on your responsibilities to avoid information overload.

Your Role	Your Core Task	Read This Section
Submitter	Fill out the form, provide resource info & privacy policy links.	Part 2
Assigner	Assign submitted requests to appropriate Reviewer(s).	See between Part 2 & 3
Reviewer	Review the resource, handle Flags, and document findings.	Part 3 & Step 4
Approver	Make final approval decisions or request Additional Review.	Step 4 & Part 4
Finalizer	Perform final checks, set conditions, and publish to the catalogue.	Part 4

Part 2: I am a Submitter (Submitter Guide)

For teachers or staff introducing a new classroom resource.

Step 1: Submit a C-PIA Request

1. Open the Form: Go to School Website → Staff Resources → District C-PIA → C-PIA request form.
2. Enter Information: Input the resource name, purpose, and target age group.
 -  Crucial Reminder: You must include links to the resource's Terms of Use and Privacy Policy! This will significantly speed up the review process.
3. Confirm Scope: If this is for "School-wide / Multi-classroom Use," ensure you list the names of the administrative personnel who are aware of this request.
4. Submit: Click Submit.

What happens next?

- You will receive a confirmation email.
- The system status will change to Submitted for Review.

- If it's a "No Flags" resource: The system will auto-confirm basic quality/curriculum checks. You will immediately receive an "Approved to use" email without waiting for a long manual review. *(Note: If it's for school-wide use, the listed admin will still be notified.)*

Part 3 – I am a Reviewer (Reviewer Guide)

For staff evaluating the privacy risks of a resource.

Step 2 & 3: Start Review & Handle Flags (Core Action)

When you receive the C-PIA Flagged Review Request email, click the link to enter the system. You will see the Flags (color-coded alerts) automatically generated based on the resource's privacy policy.



Flag Practical Handling Guide (Action required based on color)

● Green / ● Yellow Flag (Low/Medium Risk: Policy or Contract Issues)

- Common Scenarios: Privacy policy missing/unclear, data security not confirmed, contractual binding required (e.g., teacher must agree to ToS), or lack of appropriate conduct rules for user interaction.
- Your Action: Proceed to attempt resolution.
- Suggested Solutions:
 1. Accept Risk: If you determine the risk is acceptable in your specific context.
 2. Add Conditions: Fill out the Conditions of Approval in the system (e.g., "Teacher login only; students must not enter PII").
 3. Seek Clarification: Contact the vendor for written clarification and upload it as an Attachment.

● Orange / ● Red Flag (High Risk: Sensitive Data or Severe Violations)

- Common Scenarios:
 - ● SPI (Sensitive Personal Information): Collecting PEN, SIN, health, financial, or IEP data.
 - ● Third-party sale: Vendor sells personal info to third parties.
 - ● Inappropriate commercialization: Targeted ads or marketing to students.
 - ● Data integration (SSO): Requires integration with District Microsoft/Google/Apple accounts.
- Your Action: Pause! The system defaults to 'Not Approved'. Do not attempt to resolve this on your own.
- Suggested Solutions:
 1. Document Concerns: Detail exactly why the Red/Orange Flag was triggered in the Comments section.
 2. Submit to Approver: Click Submit to pass the case to the Approver.

3. Wait for Instructions: The Approver will decide whether to approve, deny, or send the case back for Additional Review (see Step 4 below).

 **Reviewer Pro Tip: Before clicking Submit, ensure you have filled out the Comments, added Conditions of Approval (if applicable), and uploaded any supporting Attachments.**

Step 4: Additional Review (If Required)

This is a special "loop" that occurs when an Approver determines a Red/Orange flag requires specialized expertise before a final decision can be made. It involves both the Approver (who triggers it) and the Reviewer(s) (who execute it).

When does Step 4 happen?

The Approver receives a case with unresolved Red/Orange flags.

The Approver decides that the original Reviewer(s) alone cannot resolve the issue.

Specialized expertise is needed (e.g., IT Security, Privacy Officers, District Principals, CIO).

How it works (Step-by-Step):

Approver Triggers Additional Review:

- Open the C-PIA Approval Request email and click the item link.
- Review the flags and Reviewer comments. Determine that further review is needed.
- Add Additional Reviewers: In the item record, add the names of specialists in the Reviewers box.
- Who to add? IT staff/managers, Privacy contacts, Directors of Instruction, District Principals, helping teachers/coordinators, Chief Information Officer, etc.
- Add Instructions: Write clear instructions in the Comments box (in the item record and/or the Approver's email) explaining exactly what needs to be assessed.
- Click 'Reassign' in the C-PIA Approval Request email.

Additional Reviewer(s) Execute the Review:

- You will receive a Digital Tool Additional Review Request for <ResourceName> email.
- Read the Approver's instructions carefully in the email.
- Proceed with the assigned aspect(s) of further review (e.g., security assessment, SSO integration check, data flow analysis).

When ready to report:

- Click the item link in the email.
- Add resolution comments and/or documentation.
- Update the Recommendation status.
- Add/revise Conditions of Approval as needed.
- Click 'Submit' in the email.

Approver Re-assesses:

- Once all Additional Reviewers have clicked Submit, the Approver receives a Resolution Comments Added for <ResourceName> email.
- Click the item link. Review the resolution actions in Comments.
- Determine if a result has been reached, or if further resolution is needed.
- Make the final Approval Decision (proceed to Part 4 below).

✅ **Outcome: The case returns to the Approver for a final decision at Step 6.**

Part 4 – I am an Approver & Finalizer (Approver & Finalizer Guide)

For management staff making final decisions and publishing to the catalogue.

Step 5 & 6: Approval Decision (Approver)

Upon receiving the C-PIA Approval Request email, click the link.

- **Approved:** If the Reviewer resolved the flags, or it's a low-risk resource. The Submitter is notified they can use it. Moves to Finalization.
- **Not Approved:** If there are unresolvable Red/Orange flags. The Submitter is notified not to use the resource.
- **Reassign / Additional Review:** If the case involves Red/Orange flags requiring deeper analysis → Go to Step 4 above.
- **On Hold / Do Not Proceed:** If 'Approved' and 'Not Approved' are not yet appropriate. Communicate with the Submitter directly.

Step 7, 8 & 9: Finalization & Publication (Finalizer)

Upon receiving the C-PIA Review Finalization Needed email, perform the final checks:

1. **Check Expiry Date:** Confirm the Expiry Date (default is 3 years).
2. **Catalogue Info:** Add/update the resource description, Terms of Use link, and upload a Logo/Image.
3. **Consent Form:** If the vendor's Terms of Use require parent/guardian consent, create and upload the Consent Form template here.
4. **Publish:** Toggle the Publish review switch to ON. The resource will officially appear in the Published Catalogue for all district staff to see.

Part 5 – Troubleshooting & FAQs (What Should I Do?)

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What is the situation?	What should you do?
I'm a Reviewer, but the case is stuck.	The system automatically sends a reminder email after 12 days. If still unresponsive, the Assigner can reassign the case.
The assigned Reviewer left or is on leave?	The Assigner or Approver should use the Restart Flow function to reassign the case to a new team member.

This resource already has an old, external PIA.	No need to review again. Use the Bypass Legacy function to link the old PIA, and the Finalizer will publish it to the catalogue.
It shows "No Flags", but I want it in the Catalogue.	"No Flags" resources skip manual review. To publish it, trigger Move to Catalogue , have the Approver click Approved, and the Finalizer will publish it.
The vendor updated their Privacy Policy mid-review?	Stop the current review. Ask the Submitter to resubmit, or trigger Restart Flow to re-evaluate the new policy.
I'm an Additional Reviewer. What do I do?	Read the Approver's instructions in the email, complete your specialized assessment, add comments, and click Submit.

Part 6 – Final Checklist

Before closing the system, quickly verify the following:



Submission & Assignment Phase

- C-PIA Form submitted with Terms of Use / Privacy Policy links.
- Request entered into the tracking list and assigned to a Reviewer.



Review Phase

- Reviewer read the privacy policy and completed the PIA questions.
- All Flags were identified and documented.
- *(For Y/G Flags)* Conditions of Approval added or clarification documents uploaded.
- *(For R/O Flags)* Concerns documented and handed over to the Approver.



Additional Review Phase (Step 4 – if triggered)

- Approver added instructions and assigned Additional Reviewer(s).
- Additional Reviewer(s) completed their specialized assessment.
- Resolution comments/documentation added.
- Approver re-assessed and made a final decision.



Approval & Publication Phase

- Approver made a clear decision (Approved / Not Approved).
- Finalizer confirmed the Expiry Date.
- Finalizer updated Catalogue info (Description, Logo) and Consent Form (if needed).
- Resource successfully published to the Published Catalogue.

Appendix:

A. Flag Reference

The workflow identifies the following default treatment for flag groups:

Flag Type	Default Treatment
R/O	Default: Not Approved
Y/G	Default: Approved

Important: Identified flags should be addressed and documented during Finalization, including any applicable Conditions for Use.

B. Example Test Scenarios

The workflow has been tested using Yellow, Orange, and Red example scenarios. These examples are intended to verify that different flag/risk scenarios can move through the appropriate review and approval process.

Test Scenario	Purpose / Result
Yellow Test	A Yellow example was tested to confirm that the item follows the expected review and approval workflow.
Orange Test	An Orange example was tested to confirm that the item can be reviewed and handled through the appropriate workflow steps.
Red Test	A Red example was tested to confirm that a higher-risk item is identified and handled appropriately before approval/publication.

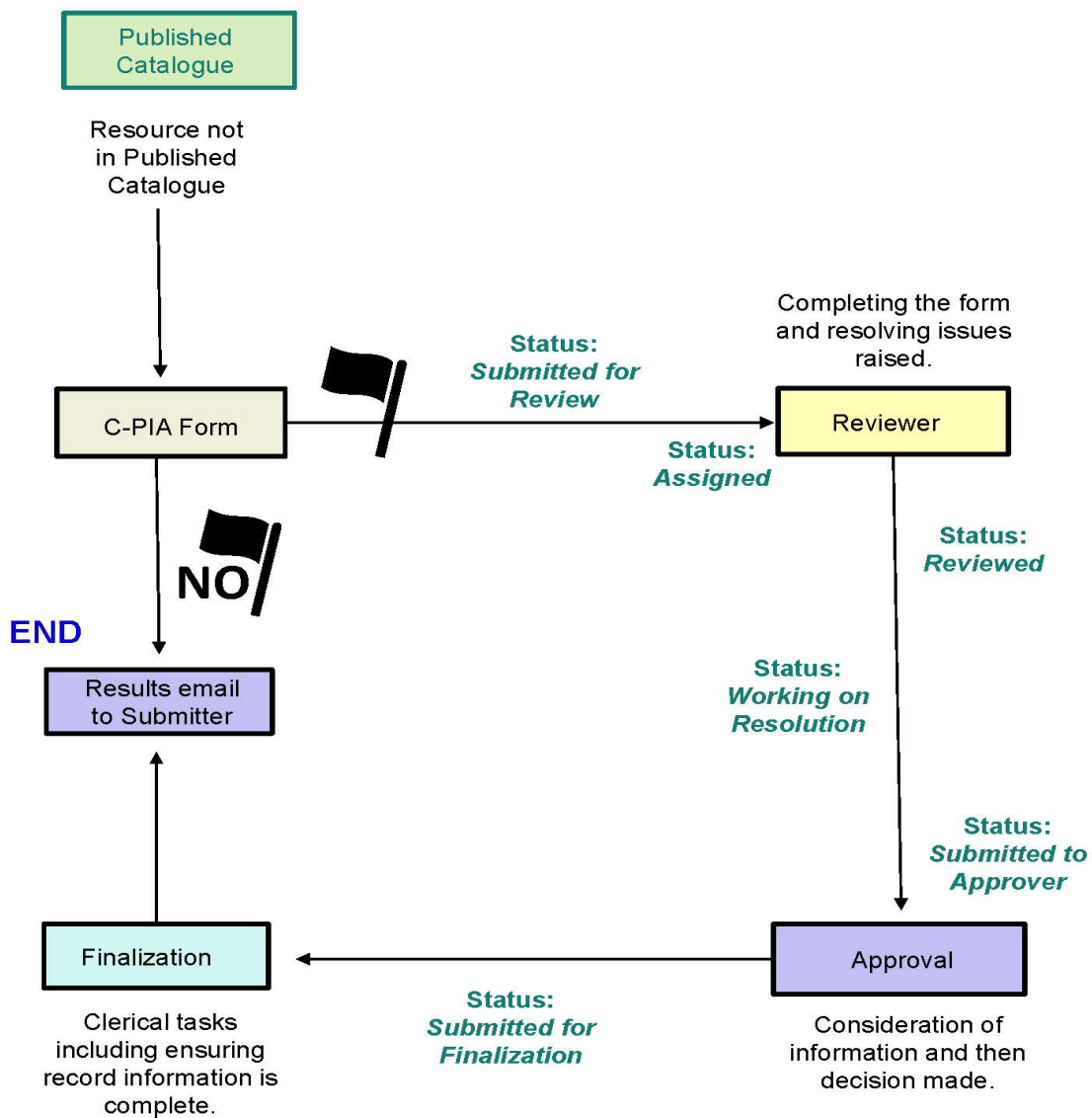
C. Checklist

- ☐ C-PIA Form submitted
- ☐ Record entered in tracking list
- ☐ Reviewer(s) assigned
- ☐ Reviewer notified
- ☐ Review completed
- ☐ Flags/issues identified
- ☐ Additional review completed, if required
- ☐ Submitted to Approver
- ☐ Approval decision completed
- ☐ Submitted for Finalization
- ☐ Flags resolved and documented
- ☐ Conditions for Use documented, if applicable
- ☐ Finalized
- ☐ Catalogue information completed
- ☐ Resource published, if approved

D. End-to-End Workflow

Classroom Privacy Impact Assessment (C-PIA) Submission

START



E. Source and Scope

This manual is based on the provided Classroom Privacy Impact Assessment (C-PIA) Process workflow from Focus Education.