

The CIPA provision “Protecting Children in the 21st Century Act” requires that your Internet safety policy provide measures for educating minors about appropriate online behavior to include:

- Cyberbullying awareness and response, and
- Appropriate online behavior, including interacting with other individuals on social networking sites

To assist with meeting the CIPA requirement, I recommend the following free resources:

- **Netsmartz Workshop** - www.netsmartz.org/TeachingResources
- **Common Sense Media** - www.commonsense.org/education

The curriculum and method of training are a local decision. However, E-Rate applicants must file a Form 486 each year, certifying they are CIPA compliant. As a review of that application, or during a federal audit, applicants may be asked for evidence of their compliance. This includes:

- Dates training took place
- Roster of students trained
- Plans for training students not present during “whole group” presentations

The FCC has provided the following FAQs that you may find helpful as you plan how best to meet the Internet safety training requirement:

Q1: What should schools include in their Internet safety policies, and what documents should schools retain to demonstrate compliance with the requirement to educate minors about appropriate online behavior?

A: It is sufficient for a school’s Internet safety policy to specify that the school educates its students about appropriate online behavior. A school is not required to provide details about the curriculum, trainings or other educational programs it has chosen in the Internet safety policy itself. Although the FCC does not require schools to specify curriculum in their Internet safety policies, they should keep records of the implementation of their chosen method(s) for educating minors about appropriate online behavior. For example, a school could maintain an annual list of the curriculum, trainings, or other programs provided to its students.

Q2: Are schools receiving E-Rate discounts for Internet access and/or internal connections required to provide education about appropriate online behavior to their students every year?

A: The Protecting Children in the 21st Century Act requires a school to certify, as part of its Internet safety policy, that it “is educating minors about appropriate online behavior.” Neither the statute nor the FCC’s rules, however, specify how often a school must provide education regarding appropriate online behavior. While we do not read the statute to require annual trainings, curriculum or online behavior education programs, the phrase “is educating” in the statute suggests some form of regular training. Therefore, schools should determine how frequently they will provide educational programs or curriculum by evaluating local or community needs, and should retain documents demonstrating the frequency with which they provide their students with such programs or access to such curriculum. For example, a school might decide to provide training about appropriate online behavior to its students when they first start using the Internet and then every other year that follows.

Q3: Do schools need to ensure the education of every student in order to be able to certify they are educating minors about appropriate online behavior?

A: Schools should provide education about appropriate online behavior to their students who are accessing the Internet using E-Rate covered services. Schools are not required to provide education about appropriate online behavior to very young students who are not yet using the Internet in school. Once schools identify the students that should receive education about appropriate online behavior, we expect schools to take reasonable steps to educate these minors. To the extent that a school has a way to record the students that have received training, it may want to retain such records. For example, if a school trains its students using an online education course, it can keep records of which students have taken the online training. Or, if a school educates its students about appropriate online behavior at a school assembly, the school could retain a record of the students in attendance that day. We recognize there may be situations, however, where it would be difficult to demonstrate that all of the students identified as needing the training have been trained, due to student absences or other variables. To the extent a school is aware that some students have missed the scheduled training, the school should take reasonable steps to provide a make-up training or otherwise provide the relevant material to those students.

If you have questions, or need additional information, please contact Lorrie Germann, State E-Rate Coordinator, at lorrie.germann@education.ohio.gov or 740-253-1153.