MOORE Public Schools
LEARNING FOR LIFE

The Moore Public Schools (MPS) Center for Technology Data Privacy and Technology Integration Survey was adapted from the Consortium for School Networking (CoSN) Privacy Toolkit to ensure potential MPS partners understand their duty and responsibility as well as the expectation of MPS regarding cybersecurity, data privacy, and the Family Educational Rights Privacy Act (FERPA) regarding the storage and management of student data. MPS also follows guidance from the Department of Education Student Data Privacy and from Access for Learning Community.

MPS strives to "Create Connections" for our students and staff – ensuring safe, efficient, and effective operations and communication is central to this process.

Completion of this survey does NOT guarantee a contract with the vendor or service provider.
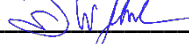
Please complete this document and email to MPS contact that sent you the survey.

DATA PRIVACY AND TECHNOLOGY INTEGRATION SURVEY
--To be completed by potential MPS partner--

Potential Partner Company Name: Edmentum, Inc.
Completed Date: 11/30/22
Name of Person Completing: Nellie Wale
Phone of Person Completing: 214.294.9851
Email of Person Completing: nellie.wale@edmentum.com

I affirm that all information below is accurate and true as to our company's data privacy and integration practices.

Account Representative Name and Signature: _____

Frank Jalufka, Chief Financial Officer
--If you ONLY provide links to your website and do NOT complete the information requested will be returned and may result in your exclusion for consideration—

Data Collection

Do you **AND** your associated 3rd Parties comply with all federal and state requirements like FERPA, COPPA, etc as defined by Protecting Student Privacy | U.S. Department of Education for any and all functions, such as analytics or PII?

Yes. To the extent that Edmentum's proposal under this RFP is accepted, in satisfying its obligations identified in the resulting contract executed by the parties, Edmentum agrees to comply with all applicable local, state, and federal laws and regulations.

Individual student data is stored in the program's database and cannot be accessed without first accessing a username, password, and associated permissions. All usernames, passwords, and permissions are encrypted. The logon process uses TLS so the transmission of account data/information is encrypted. It is up to the end user to keep usernames and passwords confidential. Security permissions by class etc. for all users are controlled by your Account Administrator.

The importance of security for all personally identifiable information is of utmost concern to us. As such, Edmentum follows industry security best practices. All traffic on our network is protected by firewalls that deny all and only allow access by exception. All networks both internal to production systems and external to production systems are separated by firewalls. In addition, we periodically engage a third party to audit our network security.

Data stored at data centers is managed exclusively by authorized Edmentum personnel. All learner progress data can be exported from the management system in CSV or XML format to be used with external databases via reporting capabilities in the application. Learner data is backed up daily and stored at a secure facility.

Edmentum is committed to protecting students' privacy and acknowledges that Moore Public Schools has a legal obligation to maintain the confidentiality and privacy of student records in accordance with applicable law and regulations. You will find our current documentation, including our Customer Privacy Policy, COPPA Assurance Statement, and FERPA Assurance Statement, is already extremely thorough and should address any concerns. Our documents are public and reside on our website (links also provided below). In the standard terms, we reference our Customer Privacy Policy, within which we reference our COPPA and FERPA Assurance statements.

- Edmentum Standard Terms - www.edmentum.com/standardterms
- Apex Learning Standard Terms - www.apexlearning.com/terms-of-use
- Customer Privacy Policy - www.edmentum.com/privacy/customer
- Apex Learning Privacy Policy - www.apexlearning.com/privacy-policy
- Edmentum Assurance to COPPA - www.edmentum.com/coppa
- Edmentum Assurance to FERPA - www.edmentum.com/ferpa

Do you **AND** your associated 3rd Parties COMPLY with the General Data Protection Regulation (GDPR)? GDPR became enforceable on May 25, 2018. **Please provide a direct link to your public GDPR policy.**

Yes. Edmentum is committed to protecting students' privacy and acknowledges that Moore Public Schools has a legal obligation to maintain the confidentiality and privacy of student records in accordance with applicable law and regulations. You will find our current documentation, including our Customer Privacy Policy, COPPA Assurance Statement, and FERPA Assurance Statement, is already extremely thorough and should address any concerns. Our documents are public and reside on our website (links also provided below). In the standard terms, we reference our Customer Privacy Policy, within which we reference our COPPA and FERPA Assurance statements.

- Edmentum Standard Terms - www.edmentum.com/standardterms
- Apex Learning Standard Terms - www.apexlearning.com/terms-of-use
- Customer Privacy Policy - www.edmentum.com/privacy/customer
- Apex Learning Privacy Policy - www.apexlearning.com/privacy-policy
- Edmentum Assurance to COPPA - www.edmentum.com/coppa
- Edmentum Assurance to FERPA - www.edmentum.com/ferpa

If the you **AND/OR** the 3rd party does NOT meet above standards, do you assume risk and all associated costs such as mitigating data breach, credit history checks, etc?

N/A

--If applicable and any of the above answers are "NO", this potential provider does NOT comply with federal guidance/policy and is a risk to MPS student/staff data. —

Data Security and Portability

Do you guarantee data portability in a usable format of all data elements collected and stored for MPS? What format will you provide this data back to MPS?

"All" data elements are not portable, however, critical data elements such as student reporting data and usage are exportable via CSV and PDF downloads. Reading Eggs supports a data pull from the system upon request.

Do you (including all associated 3rd parties) guarantee all data will be deleted with certification upon completion of a contract within 60 days?

Yes. Customer data is retained until client requests deletion. Please see our Standard Service Purchase and Software License Terms for additional information at www.edmentum.com/resources/legal/standard-terms.

Have you experienced any internal or external data breach or cybersecurity event within the last 24 months? If so, what was the issue and please explain action taken to communicate and resolve. *A non-disclosure can be signed as needed.*

No. Edmentum has not experienced any internal or external data breaches or cybersecurity events within the past five years.

Will any data be stored outside the United States? Where is it stored?
No. Data centers and all data are located within the continental United States.

How is your data at rest encrypted and protected (e.g. just passwords, passwords and sensitive data, all data)?
All data is encrypted in transit and at rest. The platform uses TLS so the transmission of account/data information is encrypted at rest and in transit. All traffic on our network is protected by firewalls and antivirus. Encryption is FIPS 140-2 compliant.

If the application is multi-tenant (several districts on one server/instance) hosting, how is data and access separated from other customers in the event of a data breach or event?
The application is not multi-tenanted. Edmentum database accounts are separated by account. All locations within an account share a database. Accounts can be separated so that each location has its own account. Reporting aggregation would be limited to each account and would be completely separate. Please see our Standard Service Purchase and Software License Terms at www.edmentum.com/resources/legal/standard-terms and our Customer Privacy Policy at www.edmentum.com/privacy/customer for additional information.

How does the provider protect data in transit (e.g. SSL, hashing)?
All traffic is protected via TLS 1.2 or better.

Does the provider perform background checks on personnel with administrative access to servers, customer data?
You may be required to complete a "Declaration by Vendor" certifying your company has completed a sex offender verification on any employee with access to our student's records or access to our facilities.
Yes. Edmentum performs background checks on all job candidates prior to making a job offer. We do not and have not hired anyone with a felony record.

Does the provider perform regular risk assessments, penetration testing, vulnerability management, and intrusion prevention?
Yes. Edmentum performs quarterly internal and external security scans. Any identified risks are logged and prioritized on a risk register with planned mitigation/remediation activities. In addition, Edmentum periodically performs additional penetration testing and/or other relevant threat assessments and performs subsequent remediation efforts based on the findings of these assessments.

Are backups performed and tested regularly and stored off-site?
Yes. Databases are continuously backed up on site and off site. Backup reports can be reviewed upon request.

Will you provide certification of data destruction upon completion of contract? **MPS requires all data to be provided back to MPS and associated data destroyed on your servers and/or third parties within 60 days of termination of contract.**
Yes.

Instructional Technology (IF APPLICABLE)

Have you signed the K-12 School Service Provider Pledge to Safeguard Student Privacy 2020? Are you willing to comply and sign the privacy pledge? Take The Pledge - Student Privacy Pledge | Pledge to Parents & Students
Edmentum participates in multiple privacy and other programs to show our commitment to safety in learning including, but not limited to, the 1EdTech TrustED Apps program, as well as the Project Unicorn pledge and Certification.

Have you been vetted by another state educational entity that is part of the Access for Learning Community or state educational privacy alliance that is part of the COSN network. If so, please identify the state.
No.

Do you offer Single Sign On (SSO) or Rostering for teacher and/or student accounts? If so, can you work with our current solution(s) with OneRoster, Clever, Kimono, and GG4L **without** modifications or "work-arounds"? Is there an added cost?"
Yes. Below we have outlined our integration options. Integrations are offered free of charge.

Content Accessibility and Integration
Reading Eggs is not currently LTI compliant based on IMS Global standards. Content can only be accessed by directly logging in to the program. No direct API currently exists for this program.

SIS Integration
Automatic data synchronization with your SIS is an important component to ensuring a seamless implementation. Through our secure SIS integration partner, you can sync user records and other SIS data such as location changes and user activations. You can also automatically import and sync school, teacher, and student information. Edmentum partners with Clever.

Class Rostering
Automatic rostering of class enrollment with your SIS is possible with Reading Eggs. Classes can be fully populated with automated rostering. Edmentum partners with Clever.

Single Sign-On
Single sign-on (SSO) is the easiest way for students, teachers, and administrators to log in to Reading Eggs. Whether it's Google, ADFS, SIS-stored credentials, or another Identity Provider, many schools have a username and password that students already use to access technology at their school site. SSO allows you to use that same system to authenticate users for learning applications, rather than creating new credentials each time.

Because the actual login is handled by your Identity Provider, Edmentum will never have access to the usernames and passwords used for logins to any non-Edmentum Identity Provider. Edmentum partners with Clever.

Does your platform fully integrate with Canvas, Clever, Infinite Campus? Do you charge for these integrations?
Reading Eggs integrates with Clever. Integrations are offered free of charge.

(If applicable) Does your application allow for grade pass back to Infinite Campus and/or Canvas?
No.

Does this program have embedded videos through Youtube, Vimeo, or other streaming sources?
No.
- Are the videos under a specific channel for ease of whitelisting settings?
  - Provide example URL
- Vimeo
- Youtube
- Other: Please identify.

Does your instructional platform have stand-alone iOS and Android apps as opposed to accessing via web platform?
No.

Center for Technology

Data Privacy and Technology Integration Survey

To be completed by MPS Staff:

Y / N – Did the company provide the data checklist (Spreadsheet)

Y / N - Does the company adhere to federal/state/district data privacy regulations/guidance?

Y / N – Does the company integrate with MPS's current systems?

Y / N – Does the company meet the minimum requirements for their data security and implementation?

Reviewed by: _____ Date: _____