Center for Technology

MOORE Public Schools
LEARNING FOR LIFE

Data Privacy and Technology Integration Survey

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.

Current as of 11May2022

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

Potential Partner Company Name: Yeqros Educational LLC
Completed Date: 9·19·22
Name of Person Completing: Alejandro Yeqros
Phone of Person Completing: 617 209 9465
Email of Person Completing: support@conjuguemos.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: Alejandro Yeqros

--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

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.**

See https://conjuguemos.com/prvcy

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?

yes

--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. --

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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?

CSV

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

it is deleted upon Request by user (yw)

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

Will any data be stored outside the United States? Where is it stored?

stored in Amazon Web Servers

How is your data at rest (encrypted) and protected (e.g. just passwords, passwords and sensitive data, all data)?

see our privacy doc : https://conjuglemos.com/privacy

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?

n/a

How does the provider protect data in transit (e.g. SSL, hashing)?

see privacy doc

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.

n/a

Does the provider perform regular risk assessments, penetration testing, vulnerability management, and intrusion prevention?

yes   *yes*   *yes*   *No*

Are backups performed and tested regularly and stored off-site?

yes

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

No

Do you **AND** your associated 3rd Parties ensure compliance with federal requirements under the Children's Internet Protection Act (CIPA) defined by the FCC's Children's Internet Protection Act (CIPA) | Federal Communications Commission (fcc.gov). Failure to maintain CIPA compliance my result in immediate termination of contract and repayment back to the district.

yes

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 SSO : Classlink, GoogleClassroom*

Does your platform fully integrate with Canvas, Clever, Infinite Campus? Do you charge for these integrations?

yes ✓   no   no   no

(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?
- o   Are the videos under a specific channel for ease of whitelisting settings?
    - o   Provide example URL
- ✓ Vimeo
- ✓ Youtube
- o   Other: Please identify.

Does your instructional platform have stand-alone iOS and Android apps as opposed to accessing via web platform?

No

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: _____

Category of Data	Elements	Check if used by your system
Application Technology Meta Data	IP Addresses of users, Use of cookies etc.	✓
	Other application technology meta data-Please specify:	✓
Application Use Statistics	Meta data on user interaction with application	
Assessment	Standardized test scores	
	Observation data	
	Other assessment data-Please specify:	
Attendance	Student school (daily) attendance data	
	Student class attendance data	
Communications	Online communications that are captured (emails, blog entries)	
Conduct	Conduct or behavioral data	
Demographics	Date of Birth	
	Place of Birth	
	Gender	
	Ethnicity or race	
	Language information (native, preferred or primary language spoken by student)	
	Other demographic information-Please specify:	
Enrollment	Student school enrollment	
	Student grade level	
	Homeroom	
	Guidance counselor	
	Specific curriculum programs	
	Year of graduation	
	Other enrollment information-Please specify:	
Parent/Guardian Contact Information	Address	
	Email	
	Phone	
Parent/Guardian ID	Parent ID number (created to link parents to students)	
Schedule	Student scheduled courses	
	Teacher names	

	English language learner information	
Special Indicator	Low income status	
	Medical alerts	
	Student disability information	
	Specialized education services (IEP or 504)	
	Living situations (homeless/foster care)	
	Other indicator information- Please specify:	
Student Contact Information	Address	
	Email	✓
	Phone	
Student Identifiers	Local (School district) ID number	
	State ID number	
	Vendor/App assigned student ID number	✓
	Student app username	✓
	Student app passwords	✓
Student In App Performance	Program/application performance (typing program-student types 60 wpm, reading program-student reads below grade level)	✓
Student Program Membership	Academic or extracurricular activities a student may belong to or participate in	
Student Survey Responses	Student responses to surveys or questionnaires	
Student work	Student generated content; writing, pictures etc.	
	Other student work data Please specify:	
Transcript	Student course grades	
	Student course data	
	Student course grades/performance scores	
	Other transcript data -Please specify:	
Other	Please list each additional data element used, stored or collected by your application	

Category of Data	Elements	Check if used by your system
Application Technology Meta Data	IP Addresses of users, Use of cookies etc.	
	Other application technology meta data- Please specify:	
Application Use Statistics	Meta data on user interaction with application	
Assessment	Standardized test scores	
	Observation data	
	Other assessment data- Please specify:	
Attendance	Student school (daily) attendance data	
	Student class attendance data	
Communications	Online communications that are captured (emails, blog entries)	
Conduct	Conduct or behavioral data	
Demographics	Date of Birth	
	Place of Birth	
	Gender	
	Ethnicity or race	
	Language information (native, preferred or primary language spoken by student)	
	Other demographic information-Please specify:	
Enrollment	Student school enrollment	
	Student grade level	
	Homeroom	
	Guidance counselor	

Category of Data	Elements
Schedule	Student scheduled courses
	Teacher names
Special Indicator	English language learner information
	Low income status
	Medical alerts
	Student disability information
	Specialized education services (IEP or 504)
	Living situations (homeless/foster care)
	Other indicator information-Please specify:
Student Contact Information	Address
	Email
	Phone
Student Identifiers	Local (School district) ID number
	State ID number
	Vendor/App assigned student ID number
	Student app username
	Student app passwords
Student In App Performance	Program/application performance (typing program-student types 60 wpm, reading program-student reads below grade level)
Student Program Membership	Academic or extracurricular activities a student may belong to or participate in
Student Survey Responses	Student responses to surveys or questionnaires

Check if used by your system

	Specific curriculum programs			Student work	Student generated content; writing, pictures etc.
	Year of graduation				Other student work data Please specify:
	Other enrollment information-Please specify:				
					Student course grades
Parent/Guardian Contact Information	Address				Student course data
	Email			Transcript	Student course grades/performance scores
	Phone				Other transcript data - Please specify:
Parent/Guardian ID	Parent ID number (created to link parents to students)			Other	Please list each additional data element used, stored or collected by your application