

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.

Current as of _____

--To be completed by potential MPS partner--

Potential Partner Company Name: notable Inc (d.b.a Kami) **Completed Date:** 10 feb 2023
Name of Person Completing: Dane Maslen **Email of Person Completing:** dane.maslen@kamiapp.com

As the account representative, you affirm that all information below is accurate and true as to our company’s data privacy and integration practices. Failure to provide accurate information may result in termination of contract and return of payment to the district.

Account Representative Name: Dane Maslen _____

Signature:  _____

--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 Privacy Standards

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 all functions?

Yes/ No	Comment
<input checked="" type="radio"/> Yes	Kami does comply and have worked with other schools and had it confirmed

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/ No	Comment
<input checked="" type="radio"/> Yes	https://www.kamiapp.com/privacy-policy/ and our Data processing agreement can be found here https://www.kamiapp.com/wp-content/uploads/2022/12/GDPR-2022-KAMI-Data-Processing-Agreement.pdf

Are you **AND** your associated 3rd Parties in compliance with the [American Data Privacy and Protection Act](#) (6/21/2022)? If not, estimated time of compliance. **Please provide a direct link to your public policy if established.**

Yes/ No	Comment
<input checked="" type="radio"/> Yes	The way Kami stores it data, it resides in the USA only in GCP, data can be requested deleted and modified by approved persons both customer and internally. controls are in place to prevent sharing of PII also.

Are you **AND** your associated 3rd Parties willing to self-certify with the [Privacy Shield Framework](#)?

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	Kami was compliant with this and still is even though the privacy shield framework is

no longer valid in the EU

If 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?

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	we comply to all above and also have cyber and indemnity insurance and do back ground checks on all

staff

--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

Please check with Cybersecurity Framework(s) you and your 3rd party utilize in your ecosystem. **Please visit <http://www.edspex.org> for further details about the noted frameworks.**

Check those that Apply	MAINTAINING ORGANIZATION/GROUP	FRAMEWORK(S)
	National Institute of Standards and Technology	NIST Cybersecurity Framework Version 1.1
	National Institute of Standards and Technology	NIST SP 800-53, Cybersecurity Framework for Improving Critical Infrastructure Cybersecurity (CSF), Special Publication 800-171
✓	International Standards Organization	Information technology — Security techniques — Information security management systems (ISO 27000 series)
	Secure Controls Framework Council, LLC	Security Controls Framework (SCF)
	Center for Internet Security	CIS Critical Security Controls (CSC, CIS Top 20)
	Office of the Under Secretary of Defense for Acquisition and Sustainment (OUSD(A&S))	Cybersecurity Maturity Model Certification (CMMC, ~FAR/DFAR)
✓	OTHER Soc2 type 1	Please explain: currently getting SOC2 audit

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

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	GCP and AWS in USA only DC, geolocked not to leave USA

How is our data at transit and at rest be encrypted and protected?

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	Your data is also encrypted at rest on the servers hosted by our cloud services partners AWS and Google Cloud Platform, which we

selected because of their compliance with COPPA, in transit all data is TLS 1.2 with ECDHE_RSA key exchange and AES encryption.

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?

Does the provider perform regular risk assessments, penetration testing, vulnerability management, and intrusion prevention? Please provide a date of last assessment.

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	we have a third party perform these test last one was October/November 2022, another school district also performed on in January 2023

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

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	data is stored in the cloud at all times and backed up continually, we perform restores of data at least annually

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.**

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	no data breach's or security events

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?

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	You may ask Kami to transfer the personal data you have provided us to another organization and/or ask to receive your personal data in a structured, commonly used and machine readable format.

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

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	all data will be removed once the contract has concluded or upon request it time frames need to change.

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.**

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	we can confirm this is done, local police checks and criminal checks are performed for all staff and written in contracts with vendors

Will you and your 3rd parties 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.**

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	If required we can comply

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](#)

<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Comment
	we have signed this, and willing to again if needed.

Do you **AND** your associated 3rd Parties ensure **all content and links within your application** is in 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.**

<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Comment
	We can comply to all links and content that Kami produces, if students or staff create content we cant bet

responsible for this

Do you have a National Data Privacy Agreement with 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 or district.

<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Comment
	we have many LA USD, Washington USD, Palm springs USD and more

Does your solution support accessibility and inclusivity (BEYOND W3C) for users by following the [accessibility criteria listed in ETSI EN 301 549](#)? Example: [Digital Learning Tools, Immersive Reader | Microsoft Education](#). If so, please explain or link to public web link as example. If not, what is the current roadmap to implement?

<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Comment
	https://www.kamiapp.com/solutions/accessibility/ also our WCAG VPAT can be found here https://www.kamiapp.com/wp-

content/uploads/2023/01/VPAT2.4RevWCAG-Aug2022-Kami.pdf

Do you have a Single Sign On (SSO) or Rostering for teacher and/or student accounts? If so, can you work with our current solution(s) with Azure, Clever, GG4L **without** modifications or "work-arounds"?

<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Comment
	Azure, google, out all tested in many schools, clever is in beta at the moment, GG4L we have not

Does your platform fully integrate with Canvas or Clever?

<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Comment
	full integration with Canvas now cleaver in beta.

Are there added cost for rostering, SSO creation, or any other integration needs?

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	all included in Kami

Does your application allow for preferred names versus legal names?

<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Comment
	can be bulk loaded if not SSO, if SSO then we will pull the end users preference, also students can be enabled to change it

(If applicable) Does your application allow for grade pass back to Infinite Campus and/or Canvas?

<input checked="" type="radio"/> Yes / <input type="radio"/> No	Comment
	N/A for Kami

Does this program have embedded videos through Youtube, Vimeo, or other streaming sources? students and teachers can add them

- Are the videos under a specific channel for ease of whitelisting settings? all content does go through youtube filters but is selected by the teacher or student so would abide by your district policy.
- 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?

Yes / No	Comment
	we have an extension for chrome, but the system is web based with the ability to work offline

To be completed by MPS Staff:

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?

NOTES:

Reviewed by: _____ Date: _____

Final Step: Upon Data Privacy and Integration approval, vendor will need to complete the OK_NDPA.