



## Introduction

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The iKeepSafe FERPA Program© is available to operators and service providers of websites and online services, data management systems and other technologies that are, in whole or in part, intended for use in and by schools, and which may collect, store, process or otherwise handle student data.

This iKeepProfile is intended to assist you in determining whether or not Education Framework Inc. complies with FERPA, as well as with your state laws and district policies. It indicates that Education Framework Inc. has been assessed for alignment with the iKeepSafe FERPA Program Guidelines.

The iKeepProfile is not legal guidance, nor does it guarantee or otherwise assure compliance with FERPA. If you have questions on how to use the iKeepProfile to support your school's compliance efforts, please contact your school attorney.<sup>1</sup>

## Agreement

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Education Framework Inc.

Education Framework - <http://www.educationframework.com>

Education Framework Inc. (EFI) provides privacy and consent services to K-12 schools in the United States. EFI helps schools protect student data by proactively assessing and monitoring privacy and security policies for the apps/websites that are used in the classroom, and obtaining and managing parental consent when required by federal child privacy mandates (such as COPPA). Education Framework Inc. also helps manage consent for other purposes such as field trips and athletic waivers by allowing educators to electronically send documents out to parents for their signature, tracking their responses and automatically filing digital copies of the forms.

Education Framework Inc. offers **four** software solutions that help protect student privacy:

**EdConsent:** Digital form and e-signature software for parent approvals.

**EdPrivacy:** Student data privacy management system for software and websites used in the classroom.

**EdProtect:** EdConsent and EdPrivacy offered in a suite.

**EdApproval:** Digital form and e-signature software for internal approvals related to faculty and staff.

As a participant in the iKeepSafe FERPA Program, Education Framework Inc. agrees:

1. **It will act as a School Official as defined by FERPA.** As such, it is under the direct control of the applicable school with regard to use and maintenance of education records.
2. **Education records continue to be the property of and under the control of the school district;** and EFI is willing to stipulate as such in a contract or terms of use with the school district.
3. **Students may retain possession and control of their own student generated content,** and EFI is willing, if applicable, to provide a means by which they may do so.
4. **It will use education records only for the purposes authorized by the school,** and will not disclose personally identifiable information from education records to other parties unless it has received specific authorization from the school to do so and it is otherwise permitted by FERPA.
5. **It will not use personally identifiable information in student records to engage in targeted advertising.**
6. **It will provide a means by which a parent, legal guardian, or eligible pupil may review personally identifiable information** in the student's records and correct erroneous information.
7. **It will take actions to help ensure the security and confidentiality of education records,** including but not limited to designating and training responsible individuals on ensuring the security and confidentiality of education records.
8. **It will conduct annual training related to data privacy and security,** including FERPA requirements, for all employees responsible for any aspect of student data management.
9. **It has a data breach procedure in place** and will notify the affected parent, legal guardian, or eligible student in the event of an unauthorized disclosure of the student's records.
10. **It is willing to include contract provisions or other terms of use detailing rights related to transfer of students' personally identifiable information from education records to the school** or its designated third party upon request by the school or upon expiration or termination of the agreement, and subsequent deletion of students' personally identifiable information held by EFI and third parties operating in connection with EFI.
11. **It will not make material changes to its privacy and security policies,** including adding practices around new or additional data collection, or changes that may lessen the previously noted protections **without prior notice to the school,** separate from any notice in a "click wrap" agreement.

## Data Review Process

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Education Framework Inc. understands that it must respond in a timely manner to school requests to inspect, review, amend or correct personally identifiable information held in education records in cases where such access and change requires Education Framework Inc.'s direct involvement and is not otherwise provided for by product functionality available directly to the school. The following is the process for handling such requests:

Education records are managed directly by the schools. District personnel have direct access to student data via the account login to review, modify or delete student information.

Districts designate at least one (1) person to be the master administrator who will have full access to, and administration rights over, their data (including, without limitation, all school, teacher, student, and parent data associated with the district).

If parents have questions about modifying, reviewing, or deleting education records, they are to contact their school. Additionally, parents can disable their accounts within the school's account by sending an email to [support@educationframework.com](mailto:support@educationframework.com) with a request to disable such account, or by sending a request via the 'help' function from within the parent's Education Framework account.

Education Framework Inc. has posted within their Privacy Policy appropriate contact information for comments and questions:

Education Framework Inc.

19774 Clarion Avenue

Bend, Oregon 97702

[support@educationframework.com](mailto:support@educationframework.com)

1 (877) 978-1583

# Security Protocols

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The following is a general overview of Education Framework Inc.'s data security protocols:

Education Framework Inc. is a web-based application that can be accessed via a standard Web browser or mobile device, there are no differences between application functionality or student data security whether the application is accessed at school or on a home network. Due to the fundamental nature of Web protocols and Web browser technology, cloud-based applications such as Education Framework Inc. are not able to access any data or information stored on student or user machines, hard drives or devices.

## Software Security

Education Framework Inc. uses bank-grade security infrastructure to ensure that student data is stored and transmitted securely. This includes the use of TLS/SSL, encryption at-rest, and app level encryption.

### Transport Layer Security

Education Framework Inc. requires that all data transfer via its website use the Transport Layer Security (TLS) cryptographic protocol over an HTTPS connection. This means that unique session keys are used to encrypt and decrypt data transmissions and to validate transmission integrity.

### Encryption at Rest

Education Framework Inc. servers encrypt data at rest, including all backup data. Data is encrypted using 256 bit Advanced Encryption Standard (AES).

### Two-Factor Authentication

Education Framework Inc. offers (and recommends) a two-factor authentication mechanism. This system requires authorized district team members to first log in using their email address and password and then enter a six-digit access code that refreshes every 30 seconds from a linked mobile device.

### Single Sign-On

Education Framework Inc. offers a Single Sign-On mechanism that allows teachers and students to use their Active Directory or Google Apps for Ed credentials to sign-on to Education Framework services.

### Data Isolation

Education Framework Inc. employs district-level data isolation throughout the information transmission pipeline, from data ingestion all the way through to application user interface. Individual district-level data sets are normalized and processed in single use, highly secure, and contained environments. EFI's production environment is completely inaccessible from the Internet, and all access to it is logged and secured using multiple factor authentication. Access to the data for districts and partner applications is secured by district and application-specific credentials.

### Facility Security

Education Framework Inc.'s data centers are operated by partners with extensive experience in designing, constructing, and operating large-scale data centers. Education Framework Inc. only uses data centers that are located inside the continental United States. Physical access is strictly controlled at building ingress points by professional security staff utilizing video surveillance, state of the art intrusion detection systems, employee authentication standards, and other electronic means.

### Personnel

Employees and contractors of Education Framework Inc. receive annual privacy training that includes both COPPA and FERPA. Both employees and contractors have undergone background checks and are provided access to student data based roles and responsibilities.

### Data Breach

Education Framework Inc. has established protocols in place in the event of a data breach to include:

- Recording the date and time the breach was discovered as well as when response efforts began.
- Taking immediate steps to stop additional data loss.
- Conducting an investigation and documenting the breach.
- Notifying law enforcement, if needed.
- Reviewing information dissemination plan for district officials and individual users whose information may have been compromised.
- Alerting affected school district administrators and individuals users whose information may have been compromised.

## Access to Audit

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Once per year, Education Framework Inc. will provide schools with:

audit rights to the school's data

access to the results of Education Framework's or its third-party security audit

## Product Data List

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Data Required for Operation:

General Purpose of Data Collection

1	First and Last Name	Required to effectively support the e-consent service within the educational environment
2	Student Email Address	Required to effectively support the e-consent service within the educational environment
3	Parent (s) First and Last Name	Required to effectively support the e-consent service within the educational environment
4	School Name	Required to effectively support the e-consent service within the educational environment
5	School Address	Required to effectively support the e-consent service within the educational environment
6	Gender	Required to effectively support the e-consent service within the educational environment
7	Age	Required to effectively support the e-consent service within the educational environment
8	Date of Birth	Required to effectively support the e-consent service within the educational environment
9	UniquelD	SIS Integration

## Third Parties

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Education Framework Inc. does not provide, sell or lend any personally identifiable information to any third party. EFI utilizes the following non-identifying performance and page-level monitoring tools within the product:

1	Google Analytics
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Education Framework Inc. utilizes the following third party plug-ins within the product.

1	SendGrid
2	Sautinsoft.PdfFocus
3	EO.pdf

iKeepSafe technical assessment indicated appropriate use of 3rd parties for product functionality and analytics.

## Accuracy Statement

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Education Framework Inc. hereby confirms the accuracy and truthfulness of all information contained in the profile, and has authorized iKeepSafe to make the profile available to any interested schools

Signed and agreed:

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(Signature)

James Onstad  
(Printed Name)

President & Co-Founder  
(Title)

Education Framework Inc.  
(Member Company and Applicable Product)

03/08/16  
(Date)

Notarized By:

## Copyright

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## Disclaimer

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