inBloom Inc.
3525 Piedmont Road
7 Piedmont Center
Suite 300
Atlanta, GA 30305

inBloom.org

Assemblyman O'Donnell:

Thank you for your invitation to attend the April 29th town hall meeting you are hosting in Brooklyn. I was pleased to learn that these issues are being surfaced among your community members.

While inBloom isn't able to join the discussion on the 29th, we, along with our state and district partners, share your concern for ensuring the security and privacy of student information.

As you know, for years now states and districts have been looking for ways to improve education and identify systems to better help teachers deliver classroom instruction that meets students' individual needs. inBloom was created exactly for this purpose. In order for teachers to meet the learning needs of every student and enhance their 1:1 instructional time, it is essential for teachers to have access to student performance and other data in real time.

The idea of utilizing student data is nothing new – especially in New York, where it has been collected and used for many years. That task is made unnecessarily difficult, however, by outdated systems that are far more cumbersome than helpful. inBloom offers states such as New York a secure technology service that makes it simpler for teachers to see a more complete picture of student learning and find learning materials that match each student's learning needs and spark student engagement. It also makes it easier for states or school districts to offer a parent dashboard, should they choose to, so parents can more easily see what their children are studying and how they're doing in school.

Our privacy policy was developed in partnership with leading experts in the country, and our technology infrastructure is based on industry-leading security standards. We are meeting or exceeding the highest privacy and security standards and federal requirements, including FERPA, and the states and districts we work with have told us that inBloom's approach to protecting student and teacher data is a significant improvement over what they can do on their own.

As you can read in our privacy and security policy on our website (www.inBloom.org/privacy-commitment), student data privacy and protections in states and districts will not change with the adoption of inBloom services. As always, New York State remains in control of its education data and its privacy policies – working with inBloom simply gives the state a more secure, cost-effective solution.

I hope you will take some time to visit our website for information on the policies inBloom has adopted to protect the student information that states and school districts store using our services. In doing so, you'll see student data privacy is a top priority for us. Enclosed is a backgrounder reiterating some of the basic facts about inBloom – including what it is, what it's not, and the steps we have taken to ensure the privacy of student data – which you are welcome to share with attendees at the town hall meeting. Our Frequently Asked Questions page (www.inBloom.org/faq) may also be a helpful resource.

I look forward to answering any questions you may have.

Kind regards,

Iwan Streichenberger
Chief Executive Officer

inBloom

Why inBloom?

- Teachers, parents, and advocates agree that in order to help students achieve, they need learning experiences tailored to their needs and that make the most of teachers' time with them.
- Traditionally, the student information needed to foster more personalized learning was housed on disconnected and often outdated systems maintained by individual states and districts across the country.
- The costs associated with updating and integrating these systems are high; therefore, states and districts have faced major financial barriers.
- inBloom offers states and districts a secure technology platform, which brings together secure student data, services, and educational applications into a unified solution, which not only provides educators with a single window for real-time monitoring of student progress, but allows for the sharing of costs and services across multiple states rather than each state bearing the costs of a separate system.

What inBloom is *not*

- inBloom is not creating a national database. Each participating district has their own protected data storage space and their districts will continue to own, manage and control access to their data, just as they do now.
- inBloom has no ownership of student records. Neither inBloom nor any other participating agency or vendor may sell or share confidential student data. In addition, inBloom philanthropic supporters such as the Gates Foundation and Carnegie Corporation have no access to student data via inBloom.
- In other words, vendors have no access to student records through inBloom unless authorized by a state or district with legal authority over those student records.

On data privacy & security

- Student data privacy is a top priority for inBloom, and protections for student privacy have been addressed throughout the design and ongoing operations of our solution.
- We have created our privacy policies and protections in partnership with some of the leading privacy experts in the U.S., who serve on our Independent Advisory Board, including:
    - **Shawn Henry**, President of Services, CrowdStrike; Former Executive Assistant Director for cyber investigations at the FBI
    - **Jay Pfeiffer**, Senior Associate, MPR Associates, Inc.; Former Deputy Commissioner for Accountability, Research, and Measurement, Florida Department of Education
    - **Christopher Wolf**, Director at Hogan Lovells LLP's Privacy and Information Management Practice; Founder and Co-chair of the Future of Privacy Forum
- We also work closely with other experts like Steve Winnick, our legal counsel from EducationCounsel LLC (also the former deputy general counsel of the U.S. DOE) and Michael Gibbons, managing director with advisory firm Alvarez & Marsal (who spent 15 years with the FBI's Computer Investigations Unit where he oversaw all cybercrime) to regularly review our privacy and security policies and protections.
- The services inBloom provides and the pilot states and districts that use those services are fully compliant with the Family Educational Rights and Privacy Act (FERPA), the federal law created specifically to protect the privacy of families and students.
- States and districts using inBloom retain ownership and control of their data, and how that data is collected, retained and made available to the right users and applications.
- That means student data privacy and protections in the states and districts do not change with the adoption of inBloom services. Education content providers will continue to contract directly with states, districts, and schools as they already do in order to access and provide any services that utilize student information.
    - Each participating state and district has its own protected space in the inBloom platform. Personally identifiable student data will not be disclosed across states or districts.
- While the inBloom platform provides the privacy and security functionality required by FERPA, it remains the responsibility of each adopting state and district to ensure that their use of the technology is compliant with FERPA and other applicable data privacy and security laws and regulations.
- For more information, you can visit inBloom's website and view the full privacy policy: https://www.inbloom.org/privacy-security-policy.