

Clarity School Climate

Engaging Education Solutions, LLC FERPA & PRIVACY DISCLOSURE

For District Review · Version 3.0 · April 2026

<p>✓ FERPA Designed to Support Compliance</p>	<p>✓ Privacy-by-Design No Traditional Student PII Collected</p>	<p>✓ AI-Safe No Data Used for Model Training</p>
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1. FERPA Compliance Statement

Clarity School Climate is designed to support compliance with the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g, and its implementing regulations at 34 CFR Part 99. Engaging Education Solutions, LLC serves as a data processor on behalf of contracting school districts. The district retains all rights as the data controller and retains ownership of all education records.

Clarity School Climate is engineered to avoid collection of personally identifiable information (PII) as defined under FERPA. To the extent any data collected through the platform could be construed as an education record under FERPA, Engaging Education Solutions, LLC operates as a “school official” under 34 CFR § 99.31(a)(1)(i), with a legitimate educational interest limited solely to delivering the contracted Clarity School Climate service.

Note on open-text responses: While Clarity School Climate is designed to prevent collection of PII, participants may occasionally include identifying information voluntarily in open-text responses. Districts should inform participants not to include personally identifying information in their survey responses.

2. What Data We Collect — Complete Inventory

The following table is a complete and exhaustive inventory of all data stored by Clarity School Climate:

Data Type	Stored ?	Details
Anonymous session ID (UUID)	YES	Randomly generated at session start. No connection to any named person, account, or device.
Transcribed survey responses	YES	Spoken responses transcribed in real-time. Audio is processed transiently and is not stored by Clarity School Climate or OpenAI (zero-retention API tier). Only text is retained.
Numeric scale ratings (1–4)	YES	Agreement ratings with no linkage to any individual respondent.
School name	YES	Institutional identifier — not a student identifier.
School ID	YES	Opaque institutional code assigned by district administrator.
Survey token (SCL-XXXXXX)	YES	Identifies role group only. Never linked to individual respondents after submission.
Student name	NO	Never collected, transmitted, or stored.

Student email address	NO	Never collected, transmitted, or stored.
Student ID number	NO	Never collected, transmitted, or stored.
Device identifier	NO	Never collected, transmitted, or stored.
IP address	NO	Never collected, transmitted, or stored.
Voice audio / recordings	NO	Audio is processed transiently for real-time transcription. No audio file is ever created, stored, or retained.
Cookies or tracking pixels	NO	Clarity School Climate does not use advertising cookies or tracking pixels.

3. How Anonymity Is Protected

Every participant is assigned a randomly generated session ID (UUID) at the start of their survey. This UUID has no connection to any named person, email address, student ID number, device, or IP address.

Survey tokens (SCL-XXXXXX format) identify which role group a response belongs to but are not attached to individual respondent data after submission.

Important limitation: Indirect identification may be possible in very small role groups. Districts should instruct participants not to include personally identifying information in their responses.

4. AI and Data Training Policy

- OpenAI processes data solely for the purpose of delivering real-time transcription for the Clarity School Climate service.
- Data submitted through Clarity School Climate is not used to train, fine-tune, or improve OpenAI's models (zero-retention, no-training tier).
- No Clarity School Climate data is ever used to train any AI model operated by Engaging Education Solutions, LLC or any sub-processor.
- Data is never sold, licensed, or shared with any party for advertising, analytics, or model-improvement purposes.

5. COPPA Compliance

Because Clarity School Climate does not collect any personal information from any participant of any age, COPPA's data collection requirements do not apply. School Climate surveys are currently deployed only to high school students (grades 9–12). If the platform is ever used with students in grades below 9, the district should notify Engaging Education Solutions, LLC in advance.

6. Data Storage and Security

- Hosted in the United States (Google Cloud us-central1 region).
- Encrypted at rest using Google's default AES-256 encryption.
- Encrypted in transit using TLS 1.2 or higher.
- Access restricted to authorized Engaging Education Solutions, LLC personnel only.
- Data is never sold, shared with advertisers, or used to train AI models.
- Processor is in the process of obtaining cyber liability insurance and will provide proof upon request once a policy is in place.

7. Third-Party Sub-Processors

Sub-Processor	Purpose	Data Shared & Protections
OpenAI	Real-time voice transcription	Anonymous transcribed text only. Zero-retention, no-training API configuration.
Google Cloud Firestore	Secure data storage	Anonymous session data only. AES-256 at rest, TLS in transit, US-hosted.
Resend	Transactional email delivery	District administrator email addresses only. No participant response data.
Vercel	Application hosting	No participant data processed or stored.

8. District Rights

- The right to request a complete export of all response data associated with your district within 30 days of written request.
- The right to request permanent deletion of all data associated with your district at any time, with written confirmation of completion.
- The right to restrict or terminate data processing at any time by deactivating your district's account.
- The right to receive notification within 72 hours of discovery in the event of a data breach affecting your district's data.
- The right to audit Clarity School Climate's data processing practices upon no less than 10 business days written notice, no more than once per calendar year absent a confirmed breach.
- The right to object to new or changed sub-processors within 30 days of written notice.

9. Data Retention

Survey response data is retained for the duration of the district's active subscription and for 90 days following subscription termination, after which it is permanently deleted. Districts may request earlier deletion at any time by contacting Dr. Christopher M. Knoell at knoell@engagingpd.com.

10. Contact for Privacy Matters

Dr. Christopher M. Knoell
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engagingpd.com
 Full privacy policy: clarity360hq.com/privacy