



Student Data Privacy – Parent Letter

Dear Parent/Guardian:

You may be reading this because you have concerns about how your child's information is protected if your school is using PBIS Rewards. We are glad that you have these concerns and my intention with this letter is to give you as much information as possible. My goal, as you would expect, is to help you be comfortable with your school's decision to use PBIS Rewards as part of their PBIS initiative.

One of the documents that you can review is the Terms of Service we have with schools and organizations that use our service. This document outlines our binding commitment. You can find this at

<https://www.pbisrewards.com/policies/platform-terms-of-service/>

Below is a set of Frequently Asked Questions specifically for parents and about Student Data Privacy. The answers will help you understand exactly what your school shares with PBIS Rewards, what they track in the PBIS Rewards system, who has access to this information, how this information gets used. We hope it also demonstrates our commitment to keeping the data safe and never using it in ways that are outside of the PBIS Rewards service used by your school.

PBIS Rewards is committed to making schools a great place where students can learn and grow academically, socially, and emotionally. We love what we do and we take our responsibility to safeguard your child's data very seriously. If you have other questions, I encourage you to make an appointment with your school.

Sincerely,

A handwritten signature in black ink that reads 'Pat Heck'.

Pat Heck, CEO
Motivating Systems

Frequently Asked Questions on Student Data Privacy

Data shared by the school to PBIS Rewards

The primary use of PBIS Rewards is the Positive Recognition component. The minimum information that gets shared about students by your school with PBIS Rewards when using the Positive Recognition component is:

- Student Name (First and Last)
- Student ID Number
- Grade
- Student Email (optional)
- Gender (optional)
- Ethnicity (optional)

If your school uses Check-In/Check-Out (CICO), no additional information is needed. Please check with your school to see if they are using CICO and to learn more about Check-In/Check-Out.

If your school is using the Advanced Referral System to track Office Referrals, then some additional information is shared with PBIS Rewards. Please check with your school to learn if they are using the Advanced Referral System.

- Required Fields for Reporting:
 - Gender
 - Ethnicity

If your school is using the SEL (Social and Emotional Learning) component, no additional information is needed. Please check with your school to see if they are using the SEL component and to learn more about SEL.

If your school is making the Parent App available and wants to manage parent registration by email, then the following gets shared with PBIS Rewards:

- Parent Name
- Associated Student
- Parent Email
- Parent Phone (optional)

Who at PBIS Rewards has access to the student data?

- Who has access at PBIS Rewards?
 - A limited number of staff who help with onboarding and ongoing support.
- When do they have access?
 - When helping staff at your school during onboarding
 - When helping staff at your school when the staff person requests assistance.

How does PBIS Rewards use the data about students?

- PBIS Rewards uses the student data exclusively for providing the PBIS Rewards service to the school.
- PBIS Rewards does not market any services to students.
- PBIS Rewards does not sell the data to other organizations.

What information is tracked about students?

- Positive Recognition Component
 - Each positive recognition given by a staff person to the student.
 - Any comment attached to the positive recognition (this is optional for schools and may not be used at your school).
 - Summary totals on points earned during each grading period and each school year.
 - Purchase transactions if the student used their points to make a purchase in the school-wide store or in a teacher store.
 - Events attended if the student has used points to attend events.
 - Raffle/Drawing ticket purchases if the student has participated in raffles or drawings ran through PBIS Rewards. This would include the results of the raffle or drawing.
- Check-In/Check-Out (CICO) component.
 - Each CICO Plan setup which lists the start date and the coach/mentor when a student is enrolled in CICO.
 - Each CICO Daily Plan that makes up the overall CICO Plan. A CICO Daily Plan consists of:
 - The goals for the day for the Student.
 - A CICO Point Goal for the day.
 - Each Teacher Check-In score.
 - A final result from the day with an optional comment from the Coach Mentor.
 - A CICO Plan Final Report that shows the overall progress of the student while enrolled in the CICO Plan.
- Advanced Referral System
 - Student Name
 - Name of Referring Staff Member
 - Date, Time and Location of Infraction
 - Details on the Infraction including:
 - Staff member's description of the infraction
 - Steps the staff member took to try to diffuse the situation
 - Office Staff response to the office referral including:
 - Name of the Office Staff Member
 - Notes on the interaction with the student
 - Any disciplinary action given to the student

- Optionally, the Office Staff Member can include a note to the parents/guardian and can provide private information that does not get shared back with the referring staff member, but which should be documented.
- SEL Component
 - Student Self-Reported SEL status.
- Other Intervention Data
 - Staff members can attach additional documentation on interventions on an ad-hoc basis so that behavior reports printed from PBIS Rewards include a complete record of all interventions provided to the student.

What is stored with the QR Codes and Bar Codes on the ID Card?

The first thing to know is that not every school uses ID Cards with PBIS Rewards, so you will want to check with your school. The QR Code and/or Bar Code on the ID Card represents the ID Number of the Student much like a magnetic strip on a credit card represents the credit card number. Nothing is stored on the card beyond what is visible on the card.

What is at risk if my child loses his/her ID Card?

Your school controls what prints on the ID Cards, but here is the complete list of what may be on the card.

- The school logo which almost always identifies the school.
- The name of your child.
- If your school uploads photos, your child's photo may be on the ID Card.
- A QR Code representing the school's ID Number of your child
- Optionally, the school may also print a Bar Code representing the school's ID Number of your child. Generally, they do this if the ID Card is used with other systems in the school such as the library check-out or in the lunchroom for payment.
- Optionally, the school may print the actual ID number on the card if there are places where your child needs to enter his/her ID number and may not always be able to remember it.
- Optionally, the school may show the Grade Level (Kindergarten, 2nd Grade, etc.) on the ID Card.

There isn't any other information available to the finder of an ID Card. Reading the QR Code or the Bar Code will show the school ID number for your child, but the finder will not be able to look up anything with this number.

You will want to ask your school if they have students take their ID Cards home at the end of the day. Some schools collect the ID Cards at the end of the day so there is less chance that the ID Card is lost outside of the school property.

Why is my school using ID Cards and are they necessary?

PBIS Rewards can be used without ID Cards, but most schools do choose to use ID Cards for reasons that are primarily about PBIS Rewards but have other benefits.

1. Since students wear the ID Cards, the teachers can better learn student names and address them by name when they see them around the school. This greatly facilitates relationship building.
2. The PBIS Rewards smartphone app is easier for teachers to use when they can scan the QR Code on the ID Card. They spend less time rewarding students.
3. School Safety is enhanced, especially in middle schools and high schools when students and staff are required to visibly wear their ID Cards. If someone is in the school and doesn't have an ID Card, it is the first indication that the person should not be in the school.
4. Other systems in the school often use the ID Card as well for identifying the student.

Schools that use ID Cards are much better at rewarding students when they see them meeting the behavior expectations. As an example, if a school counselor sees a student acting responsibly in the cafeteria, the counselor can address the student by name and scan the student's badge as in "Thank you, Jared, for putting your tray away properly and keeping our cafeteria clean." Without the ID Card, the counselor may be less likely to approach the student if the counselor doesn't already know the student's name. If the counselor does approach the student, the exchange sounds like "Thank you for putting your tray away properly and keeping our cafeteria clean. What's your name so I can reward you?"

What data is stored with the smartphone App on the teachers' phones?

The only data stored on the smartphone is the teacher and school identifier. No student data is stored on the phone. Once signed-in on the app, the teachers do have the following capabilities:

- Award points to students for positive behavior
- Perform the Teacher Check-In for Check-In/Check-Out (if CICO is used)
- Help students make purchases in the school store
- Help students enroll in events
- Help students enter raffles or drawings
- Fill out office referrals (if Advanced Referral System is used)
- Review student SEL status (if the SEL feature is used by the school)

Does the data get shared with any other parties by PBIS Rewards?

If you have PBIS Rewards print ID Cards for your school, then we share the student information with **K12 Print** – a company that specializes in printing school badges. Our agreement with K12 Print includes our Terms of Service that we have with our schools and they live up to the same student data privacy provisions as PBIS Rewards. K12 Print deletes the student data after fulfilling the order. PBIS Rewards creates the card print image and securely transfers the entire print image to K12 Print so that they print the ID Cards.

- This image contains the following:
 - Required
 - Name
 - QR Code representing the Student ID Number
 - Photo if the school uploaded student photos. If the school did not upload photos, a default image is printed.
 - Optional fields determined/requested by the school
 - Grade
 - Bar Code of the ID Number
 - ID Number printed on the card

When does student data get deleted?

If a student leaves in the middle of the school year, what happens to that Student Data?

- A student who withdraws from the school will be marked inactive. Since there is educational record data associated with this student, the data is not deleted until the end of the school year as explained below.

How long does PBIS Rewards keep data on students?

- Data is deleted within 120 days of the end of the school year if the school or school district does not renew its service, but has not notified PBIS Rewards of its intention to end its service with PBIS Rewards (contract expiration without notification).
- If the school or school district notifies PBIS Rewards of its intention to end its service, then the data is deleted within 60 days of this notice. During this period, the school will have the opportunity to download the data in a report format. Once PBIS Rewards deletes the data, it cannot be retrieved.