



PBIS Rewards
223 NW 2nd St. STE 300
Evansville, IN 47708

www.PBISrewards.com
info@PBISrewards.com
(812) 434-6685
(844) 458-7247

PBIS Rewards Platform Terms of Service

Date: Prior to July 26, 2018

Prior to July 26, 2018, The PBIS Rewards Platform Terms of Service was a series of policies/documents that collectively made up the Terms of Service. These documents each had their own document repository on the PBIS Rewards website and were titled:

- Acceptable Use Policy
- Privacy Policy
- Security Overview
- FERPA

These policies covered use of the PBIS Rewards Platform that is/was used by Schools and School Districts. In some cases, there was separate negotiated contract language that superseded some or all of these policies.

As of July 26, 2018, there is a single [PBIS Rewards Platform Terms of Service](#) statement that covers the following: a) Acceptable Use; b) Student Data Privacy; c) FERPA; d) COPPA; e) PPRA. Additionally, where applicable, it covers state-specific policies.

Below are the separate policies that were effective prior to July 26, 2018.

Acceptable Use Policy

Effective August 1, 2016

The Acceptable Use Policy covers the use of this site and the PBIS Rewards service.

PBIS Rewards employs an Acceptable Use Policy to maintain the performance and integrity of its hosting equipment and the PBIS Rewards service. Breach of this Acceptable Use Policy may result in account suspension, termination without refund, or legal action.



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Prohibited Use. The School and the end users who have been authorized by the School to use the PBIS Rewards Service agree not to use the PBIS Rewards' software, computer systems and platforms:

- to generate, send or facilitate the distribution of unsolicited bulk commercial email (spam);
- to violate the legal rights of others or encourage the violation of the legal rights of others;
- for any illegal, unlawful, or fraudulent purpose;
- to distribute viruses, spyware, worms, Trojan horses, corrupted files, hoaxes, or other items of a destructive and/or deceptive nature;
- to act as a repository for the sharing or distribution of pirated software, pirated video, or pirated audio;
- to alter, interfere with, circumvent, or disable any aspect of the Services;
- to use the Services, or a component of the Services, in a manner not authorized by PBIS Rewards.

Repeated violations of this policy may result in termination of the School's Service without refund. Additionally, PBIS Rewards may take legal action against suspected violators which includes the filing of criminal charges, where applicable, and the filing of a civil suit or suits to recover damages.

Privacy Policy

Effective July 1, 2016 / Last Updated March 22, 2018

Purpose

This Privacy Policy describes the type of information we collect when you use the PBIS Rewards service and how we use and disclose that information. This policy applies to the client of record of the PBIS Rewards service and end users of the PBIS Rewards service. If you are an end user of the service, you should also consult with the school or organization who has subscribed to this service as their Privacy Policy may be different than this Privacy Policy.



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By subscribing to the PBIS Rewards system provided by [Motivating Systems](#) and/or by using the service, you expressly consent to the terms of this Privacy Policy.

We collect and store information so that we may provide services to you. We do not sell or provide any information to outside parties without first obtaining your explicit consent except as outlined below under the heading Law Enforcement Agencies.

There are three types of users of the PBIS Rewards System and our Privacy Policy applies in distinct ways to each of these types of users.

- **Organizational Users** – Organizational users includes the School's or Organization's staff and/or teachers who use the system;
- **Student Users** – Students at the School or Organization;
- **Parent Users** – Parents or Guardians of students at the School or Organization.

What We Collect

The information we collect is based on the type of user. Some of the information is required and some of the information is optional. The full list is as follows:

- **Organizational Users**
 - Required Information includes Personal Name, Email Address, and Staff Code. The staff code does not need to match an employee ID number used within other systems at the organization but must be unique for each Organizational User.
 - Not Required Information includes Phone Number and Photo.
- **Student Users**
 - Required Information includes Personal Name (although a letter abbreviation can be used for the first name), Student ID Number (although it is not required to match the Student ID Number used in other systems within your organization).
 - Not Required information includes Gender, Grade, Ethnicity, Photo. Although these items are not required, they are strongly recommended in order to simplify use of the system and to improve reporting on the performance of your PBIS program.
 - If you use the PBIS Rewards system to track Office Discipline Referrals, then we also collect information about the Office Discipline Referrals so that we can provide you with reports on Office Discipline Referrals.
- **Parent Users**
 - Name and relationship to the student.



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How We Use the Information We Collect

- **Organizational Users** – 1) To verify your identity when you use the PBIS Rewards service or when you communicate to us; 2) To communicate administrative announcements to you about the status of the services we offer and provide to you; 3) to communicate useful tips and suggestions to you to help you get the most out of the PBIS Rewards service.
- **Student Users** – To verify your identity when you use the PBIS Rewards service.
- **Parent Users** – To verify that the owner of the smart device has been granted permission to view information about a student. To give the Organization the ability to remove access for a Parent.

How Do We Collect This Information?

- **Organizational Users** – Information is uploaded to the PBIS Rewards database by an Organizational user with administrative privileges.
- **Student Users** – Information is uploaded to the PBIS Rewards database by an Organizational user with administrative privileges.
- **Parent Users** – Information is uploaded to the PBIS Rewards database by an Organizational user with administrative privileges. We also ask the parent to verify their relationship to a student when they access the student's information for the first time.

Protection

To prevent unauthorized access, promote data security, and encourage appropriate use of information, we have strict internal policies and use a variety of security tools to assist in the protection of your personal information. You will find more information in our [Security Statement](#).

PBIS Rewards doesn't sell any advertising of any kind. We do not sell advertising nor provide personal or identifiable information to third parties for any of the types of users (Organizational, Student, Parent) of our services. Additionally, we do not sell any demographic, navigation, or search data to others that could be used outside of PBIS Rewards to target advertising of any type towards any users of our service.

There are places where a user may see links to third-party websites or may see references to outside parties.



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- **Organizational Users** – Users may see links to products that support the PBIS Rewards service. PBIS Rewards does not sell this access and does not generate any revenue of any type from these links. These links are provided only as a convenience to the organizational users of the service. The School or Organization does have the ability to include a sponsor logo that appears to staff when staff open the PBIS Rewards staff app. This is fully controlled by the School/Organization.
- **Student Users** – The School or Organization has the ability to include a sponsor logo that appears when students open the PBIS Rewards student app. This is fully controlled by the School/Organization.
- **Parent Users** – The School or Organization has the ability to include a sponsor logo that appears when parents open the PBIS Rewards parent app. This is fully controlled by the School/Organization.

We are not responsible for the privacy practices of such third-party sites. If you choose to visit one of these third-party sites, you should review the privacy policy posted on such third-party site to understand how that party collects, uses and discloses your personal information.

Law Enforcement Agencies

If requested by a generally recognized Law Enforcement Agency or government official, we may provide information without your consent if it is in connection with the investigation of illegal activities. We retain the right to determine if we will require legal documentation before providing this information. We may or may not inform you that we have shared your information with a Law Enforcement Agency or government official.

FERPA Policy Statement

Background on FERPA

The Family Educational Rights and Privacy Act of 1974 (FERPA) is federal law enacted to protect the privacy of students' education records, to establish the rights of students to inspect and review their education records, and to provide students with an opportunity to have inaccurate or misleading information in their education records corrected.



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Information Stored that is Subject to FERPA

PBIS Rewards stores data on behalf of educational institutions related to the use of the PBIS Rewards service. Some of the data stored includes data that is subject to FERPA because it documents the student's behavioral record while enrolled as a student at the educational institution. This data includes:

- Points awarded to students by staff and teachers at the educational institutions when students meet behavioral expectations.
- Purchases made by students using the points awarded. Purchases may be items, events, privileges, or recognitions provided by the educational institution.
- The PBIS Rewards system may store information on Office Discipline Referrals if the educational institution is using the feature of Office Referrals within the PBIS Rewards system. The use of this feature is not required.

PBIS Rewards Support for FERPA Requests

FERPA is a compliance issue between the student and the educational institution. PBIS Rewards preserves all of the data and this data can be extracted, reviewed and modified by the educational institution. If the educational institution is no longer subscribing to the PBIS Rewards service, PBIS Rewards maintains data for a minimum of five years following the last year of use. Additionally, the educational institution can obtain a complete copy of the data at the end of each school year by logging into the system accessing Year End Reports. PBIS Rewards maintains data permanently as long as the educational institution remains an active subscriber of the PBIS Rewards service.

Requests for information will come from the student to the educational institution. The educational institution can make requests for assistance to PBIS Rewards. This assistance will be provided at no charge. Requests for assistance can be made by sending an email to support@pbisrewards.com.

In addition to ensuring that the educational institution has access to data so that it can satisfy requests for review by students, PBIS Rewards also protects the privacy of the student data. Please see the [Privacy Policy](#) of PBIS Rewards for a description of how PBIS Rewards collects and protects student



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information and please see the [PBIS Rewards Security Statement](#) for a high-level description of the system architecture.

PBIS Rewards Security Statement

Security Overview

The PBIS Rewards service is architected to provide a very high-level of security. This document provides details on the structural design of the systems that provide the service and describes the tools in place that can help your school do their part to ensure that unauthorized access does not occur.

Data Protection

The system architecture separates out the storage of data from the application intelligence. Simply put, the software programs are run on separate systems from the databases that store data about students and staff. PBIS Rewards uses Amazon's AWS Cloud Services and their suite of security tools. The software application runs on AWS EC2 instances. The database servers utilize Amazon's Relational Database Service (RDS). Data is encrypted at rest and in transit and relies on the AWS Key Management Services (KMS). Additionally, the database instances are in an Amazon Virtual Private Cloud (VPC) and the network configuration of the VPC limits access to the database instances from the EC2 instances running the software application.

There is limited access to the EC2 instances by the technical staff of PBIS Rewards. Access to make programming updates, system updates, and configuration changes can only be performed from the PBIS Rewards office. All logins and login attempts are logged. An enterprise-grade password management system is used to manage passwords and other login credentials and only necessary staff have access to this information. The password management system logs all accesses to the password data.



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Access to the application is limited to web browsers that support SSL using TLS 1.2.

Login Access Security

In any system, the weakest point of security is use of passwords. Because password use is inherently problematic, we have taken the following position to help ensure unauthorized access doesn't occur.

- Only staff (including teachers) have access to the application using usernames and passwords. When a staff user changes his/her password, the user is shown a password score as a grade. The grade is a letter from A to F. This password grade is stored and Administrative users can see the password grade for each staff user.
- Students do not have accounts with usernames and passwords to access their data. Students can access a read-only view of some of their own data by entering their Student ID Number or scanning their own badge.
- Parents can obtain a read-only view of some of their student's data only after receiving a letter from the school which contains a QR Code unique to the student. Currently, access is limited to the smartphone Parent App. The parent only has to scan the QR code a single time and the app remembers the student.

We strongly recommend that schools educate staff on the importance of good password practices and that the password grades be reviewed regularly.