NROC Statement of FERPA Compliance

July 2021

The NROC Project takes student privacy seriously. EdReady is an NROC initiative where student data are gathered and stored for educational purposes. EdReady is a personalized learning platform for math and English with special emphasis on the skills and knowledge required for students to succeed in college-level studies. For EdReady and other NROC products, The NROC Project employs best practices in data security, and only the minimum possible amount of personally identifiable information (PII data) is acquired by default. This document provides a summary of The NROC Project's privacy practices as they pertain to the Family Educational Rights and Privacy Act (FERPA).

The NROC Project is a 510(c)(3) non-profit organization that partners with educators to create courses and tools designed to improve how college and career readiness is approached and supported. The NROC Project is not an educational institution as defined by federal law; as such, The NROC Project is not subject to FERPA regulations. Nonetheless, because most institutional members of The NROC Project are educational institutions, and most of them use content and tools developed and maintained by NROC staff, this statement is provided so that member institutions can be assured that NROC's tools and practices comply with any FERPA requirements that might apply.

In summary:

1. All PII data gathered by NROC remain the property of the creators (i.e., the student, in most cases) and/or their guardians.
   a. PII data can be examined, retrieved, and downloaded at any time by the owner.
   b. PII data can be deleted at any time upon request.
2. NROC member institutions, who are entitled to access and use custom EdReady sites and all data therein, reserve a right to data access, but do not own the data.
   a. All FERPA rights that normally accrue to students within educational institutions also apply to any EdReady data generated on custom sites.
   b. Authorized institutional representatives are entitled to execute any FERPA-related request at any time, either directly via their account permissions or by request to NROC.
3. The NROC Project never sells user data of any kind, for any purpose. Data used for legitimate research purposes are subject to IRB protocols, sufficient de-identification procedures, and/or related best practices.
4. The NROC Project never leverages user data for targeted marketing or advertising purposes which are not directly related to the student's education and NROC's mission.
5. The NROC Project maintains SOC 2 security certification, including robust incident-response protocols in the event of a data corruption or breach to alert all NROC members and product users and to take corrective action.

For questions or inquiries about The NROC Project, EdReady, or procedures and protocols related to FERPA compliance, please contact NROC at http://nroc.org/about-us/contact-us/