November 27, 2017

Dear Members of the School Board and the Seattle Public Schools Community:

At Hobsons, our mission is to help students succeed through the caring adults who know them best: parents, teachers, school counselors, and education professionals. In service to our mission, we strive to be responsible stewards of client data and are committed to protecting student privacy. We want to help Seattle Public Schools and your community be well-informed about how Naviance operates, what safeguards are in place to protect student data and how it can be used to help you achieve your goals to (1) ensure educational excellence and equity for every student; (2) improve systems district-wide to support academic outcomes and meet students' needs and (3) strengthen school, family and community engagement.

We have provided this Frequently Asked Questions (FAQ) to answer some of the questions you may have received regarding Naviance and our data privacy practices.

Naviance, our college and career readiness platform, helps middle and high school students at more than 11,000 schools to discover their strengths, explore college and career interests, create actionable goals, and find their best-fit path after high school, whether they wish to attend a 2- or 4-year college, a CTE program, or go directly into the workforce or military. This comprehensive online solution will provide Seattle Public Schools with a robust and proven platform that promotes college and career readiness through encouraging academic rigor and aligning student strengths, interests, and passions to long-term goals.

A recent peer-reviewed study published in the Journal of College Access found that the average number of times a student logs into Naviance is a stronger predictor of applying to college than other factors such as gender, GPA and socioeconomic status. Naviance also helps students whose goals don't include applying to college prepare for their next steps after high school.

Since 2001, the Naviance platform has evolved through the active guidance of our diverse user community and with a specific focus on supporting the workflows and processes that are central to increasing college and career readiness. The platform's ability to address the needs of students and community has allowed under-resourced educators to scale their school counseling efforts and provide individualized support for students while fostering thoughtful collaboration with parents and guardians. Naviance provides district-wide administration with powerful, centralized controls that enable informed and actionable district-wide school support.

Naviance is currently implemented within many of your peer districts in the Council of the Great City Schools, including Houston, Dallas, Denver, San Diego, Baltimore City, Baltimore County, Montgomery County, Chicago, Orange County, and Philadelphia, among others. Client districts have reported significant achievements. Examples include:
- Chicago Public Schools increased 2- and 4-year college enrollments by 26% and more than tripled scholarship dollars received.
- Naaman Forest High School (Garland Independent School District, TX) increased FAFSA completion rates 37% which is a 10-percentage point increase from the prior year.
- The School District of Philadelphia experienced a 118% increase in the number of scholarships applied for between 2016 and 2017.

We are also proud to partner with several of your school district neighbors in Washington State including Edmonds School District, which is using Naviance to help first generation and at-risk students, among other student populations.

We fully recognize the responsibility we have to comply with all applicable laws and regulations, and to serve as a reliable and trustworthy partner to schools and districts, supporting their college and career readiness programs in the way that they see fit. Should you have additional questions, or if you would like a demonstration of the product or more information on client outcomes, please let us know, and we would be happy to provide that for you.

Regards

Monica L Morrell

Monica Morrell, Naviance General Manager

Naviance FAQ

What is Hobsons' commitment to privacy?
At Hobsons, we understand and take very seriously our obligations and responsibilities to act as good stewards of the student data that schools and districts entrust to us in order to provide them with tools to support their college and career readiness programs. As such, it is critical that we ensure the data remains private and under the control of the individual school or district at all times, and that the product is configured in the way that works best for each school or district in alignment with their contractual requirements.

What student information does Naviance collect?
Naviance receives only the student information that schools wish to house on the platform. To utilize Naviance at a school within Seattle Public Schools, we require only the following student information: unique ID number, class year, and district campus. The ID number may be an actual student ID or any unique, random number. All other information from or about students is provided at the sole discretion of each student, parent, school or district. Naviance does not allow for collection of any psychological or behavioral data about students.

How does Naviance ensure that student data remains secure?
We are committed to protecting the security, integrity, and confidentiality of the data through the use of a variety of administrative, physical, and technical safeguards. We host student data in secure server and cloud-based environments that use a firewall and other industry-standard technology in an effort to prevent interference or access from outside intruders. We also require unique account identifiers, usernames, and passwords that must be entered each time schools, districts, students, or parents sign on to Naviance. For more information on our commitment to student privacy, please refer to the Naviance privacy policy posted here: https://succeed.naviance.com/auth/signin#/privacy.

What does Naviance do with identifiable student information?
The purpose of collecting the required data elements noted above is to allow each school or district to view their students' activity within Naviance. For example, a school counselor may log into Naviance to review how a student has progressed in achieving a stated goal. Any other personally identifiable data that a school may upload onto the Naviance platform is also used solely for the internal school purpose, for each school's internal review, analysis, and reporting. We adhere to state and federal laws to make no other use of the personal information other than to serve the school or district purpose in compliance with regulation and the requirements of our contractual agreement.

Personally identifiable student information is – at all times – under the direct control of the school or district. We do not ever sell or rent student information.

Does Naviance ever ask a student to suspend or to waive their FERPA rights?
No. Naviance wholly respects and aligns with the requirements of FERPA, and does not ask students, parents, school employees, or any other individual to waive any of their privacy rights.

Did Hobsons/Naviance sign the Student Data Privacy Pledge?
Yes. We were proud to sign the Student Data Privacy Pledge, and have renewed our pledge annually since signing.

How do schools manage their student information in Naviance?
Schools and districts always have the ability to directly manage their student information. We provide schools with a dashboard within Naviance that allows them to easily access, review, correct, delete, export, or amend their student data at any time.

How can parents learn more about what their children are doing in Naviance?
Naviance is designed to facilitate parental involvement. Schools and districts may provide parents with access to create their own account through the "Family Connection" portal of Naviance. Accessing this portal allows parents to review the work their child has completed in Naviance, see postsecondary institutions their child is interested in attending, track their child's progress towards completing applications, and see where they may need help. Schools and districts can also provide parents with information about how Naviance is used in their school setting, including information about the specific Naviance features the school or district makes available to the students. For more information, please see the response below regarding third parties and personally identifiable information.

How can Naviance help support under-served student populations?
Naviance provides students with information that they can choose to explore to help them understand their strengths, plan a course of study, and make informed decisions about their life after high school. They can view interviews conducted by high school students of thousands of working professionals from diverse backgrounds to help every student define their own quest to answer the complex questions, "what should I do with my life?" It enables students to

evaluate future education plans based on a wide range of factors, to assess the likelihood of being admitted to their preferred schools, to learn how much their education will cost and explore scholarship opportunities, and to identify "best fit" institutions where they will thrive and succeed. With the support of a school counselor and **with full visibility and input from parents**, Naviance may also be used to help develop an individualized learning plan that will help students achieve their goals.

Within Naviance, students may learn about different careers and explore information on higher education institutions and certificate programs, including specifics on academic programs, campus life, costs, and scholarships. They also can use Naviance to organize information for their postsecondary applications. **If parents give permission,** students may allow nonprofit colleges and universities to share information with those students who meet certain criteria (such as a certain GPA or home state), and students can decide whether to connect with these institutions to learn more about them or to RSVP to attend campus tours or similar events.

What is the difference between using Naviance eDocs for college applications versus the free Coalition App?
The Coalition App allows students to submit college applications for free to 113 member universities. Naviance offers students much more than just the ability to apply to 113 institutions as outlined above. Naviance eDocs, a component of Naviance, allows high school counselors, registrars, and teachers to securely send student application forms, recommendations, transcripts, and school profiles electronically to thousands of participating colleges and universities. Naviance eDocs supports electronic document transfer for all 113 of these Coalition member universities, 755 Common App member universities, plus the 2,538 universities that receive submissions through Parchment.

What is the relationship between Naviance and the College Board?
Naviance is not connected to, and does not share information with, the College Board.

How has Naviance demonstrated that it can support Seattle Public Schools' goals of (1) ensuring educational excellence and equity for every student; (2) improving systems district-wide to support academic outcomes and meet students' needs and (3) strengthening school, family and community engagement.

School districts across the United States utilize Naviance to achieve their district goals. Here are just a few examples of outcomes

- **To improve *college enrollment and completion:*** A recent peer-reviewed study from the University of Arkansas and the Denton Independent School District (TX) found that using Naviance was a strong predictor of success for students interested in pursuing a college degree. Specifically, the study found: the average number of times a student logs into Naviance is a stronger predictor of applying to college than a student's socioeconomic status or other factors such as gender and GPA.
- **To increase college *application* rate:** Boothbay Region High School (ME) has 40% of students qualify for free or reduced lunch. Prior to implementing Naviance, they have had 52% college application rate. Through the use of Naviance, including college search, college application tools, and scholarship search and application, they saw an increase to 94% of seniors applying to college, an 80% increase in their first year of using the solution.
- **To increase *high school graduation rate* for Native American students:** Flagstaff High School (AZ) student body consists of 50% minority students. Using Naviance, Flagstaff improved its college and career readiness culture and improved graduation rates among the Native American student population by 17%.
- **To help families *secure financial assistance for college*:** For some students and their families, financial concerns are a barrier to pursuing higher education. At Naaman Forest High School, part of Garland School District (TX), where 51% of students qualified for free or reduced-price lunch and therefore might qualify for financial assistance for college, only 27% were completing the FAFSA to seek federal student financial aid. After implementing Naviance in the 2016-17 school year, Naaman Forest increased its FAFSA completion rate to 37%, up 10 percentage points**,** and the senior class received more than $250,000 in Pell Grants to help students pay for college.
- **To *improve equity of access*:** Chicago Public Schools embraced Naviance to expand the reach of its career and academic counseling across every school in the district. With Naviance, the district increased 2- and 4-year college enrollment by 26% and more than tripled scholarship dollars received. Each school is now on an even playing field with respect to college and career readiness. Without increasing counselor caseloads, students are provided with access to the same career inventories, education planning tools, and individualized programs, regardless of which school they attend, and administrators are able to provide tailored interventions to students, ensuring that they are creating a personalized, post-high school plan, and are succeeding.
- **To *increase parent engagement and level the playing field for all students*:** Implementing Naviance helped Stamford Public Schools (CT) to improve parent engagement in the post-high school planning process, tripling PTA meeting attendance by offering Naviance scholarship search tools. "It's about equity, accessibility, and

transparency," said Paula Ward, Curriculum Associate for Technology at the district. "That's what Naviance provides. It makes it a level playing field for all students.

What third parties are operating within Naviance?
The use of third parties is optional for Seattle Public Schools. We offer schools the option to choose from a select list of third party tools that are embedded into the Naviance platform to support their students' college and career goals. All of the third party partners providing features within Naviance are publicly available here:
https://www.naviance.com/partners.

Do third parties operating within Naviance receive student personal information?
Many of the third party tools simply provide information on potential career paths or help students explore learning styles. These third parties do not require, and do not receive, any personally identifiable information (PII). There are third party tools that some schools enable that do require minimal PII. Each of these has been configured to ensure that only the minimally required PII is sent to the third party and utilized only to fulfill the functionality that the school has chosen to enable.

When information is not required by the third party in order to operate the feature, it is not provided. Like Naviance, our third party partners are legally obligated to only use students' personal information to provide their services to the school and for no other purpose. All of our third party partners are contractually required to comply with applicable laws, to use the personal information only to provide the feature to the school on our behalf, to not share the personal information with any other parties, to delete the personal information when no longer needed or when we request that it be deleted on behalf of one of our school partners, and to comply with the Naviance privacy and security policies.

What do third parties do in Naviance?
All third parties provide optional features to schools and districts on our behalf. These features are part of the Naviance experience, and are designed to support the students' education and career goals. Examples of features provided by third parties include serving videos about different careers, sending transcripts to a college as part of an application, providing preparation for college admissions tests and providing information about scholarships. Schools may turn these features on or off at any time, at their discretion, via a dashboard within Naviance.

What agreements does Naviance have in place with its third parties?
We conduct a privacy and security review of each third party that may receive personally identifiable information prior to agreeing to any partnership to ensure that they all meet the thresholds of the Naviance privacy and security policies. In addition, each such agreement contains, at a minimum, the following requirements and agreements:

- Data provided is the minimally required information to provide the service to our client and its users
- All applicable laws, including federal and state student data privacy laws, will be complied with
- Data must remain confidential
- Data will be used for the sole and limited purpose of providing the services, and no further use of the data will be made
- Data will not be sold, repurposed, transferred, analyzed, or used for marketing purposes
- Users will not be tracked
- All personally identifiable student data remains under the direct control of the Naviance client
- Personally identifiable data will be securely destroyed upon completion of the services or otherwise at the request of Naviance on behalf of its clients