

SRC and Dr. Hite:

Please hear me through to the end, because you may be embarking on activity that is contrary to District Policy Internet and Media Presence #815.1.4.

I am Carol Heinsdorf, a member of the Alliance for Philadelphia Public Schools and a graduate of an SDP neighborhood high school.

This evening you will vote on Resolution A-29, a million dollar plus contract with Hobsons, Inc., for a college and career readiness platform that similarly can be accessed for free from the U.S. Department of Education. (U.S. Department of Education)

Have you read Hobsons' privacy policies?

Do you have plans to share the following information about Hobsons' Naviance product with our students, parents, and teachers, considering that Naviance is a privately held, 13-to-18-year-old-student tracking/data mining company? (16 CFR Part 312; Children's Online Privacy Protection Rule Review)

Following, SDP is the Client (or is PSP the beneficiary of all this personal information because they are paying for it?); students and teachers are Users.

The Naviance privacy policy (Naviance Product Privacy Statement) states:

- How Hobsons collects, retains, and uses personal information
- Clients are enabled to track, analyze, and report data, including personal and academic information about Clients and Users

Naviance:

- Collects IP addresses (which indicate a geographic location for Users)
- May view or access Client and User information
- Provides security for loss, misuse and alteration of data [although terms are not available to view on-line by the public-how safe is this?]
- Is linked to third-party sites that allow the User [our students and teachers] to [unwittingly] disclose private information

Hobsons' Privacy Statement (Hobsons' Website Privacy Statement) states:

- By using a Site, you agree to the collection, use and disclosure of personal information.

- YOU AGREE TO OUR COLLECTION, USE AND MAINTENANCE OF YOUR INFORMATION IN THE UNITED STATES. (Capital letters are Hobsons'.)

Users are required to give:

- telephone number
- year in school
- gender
- ethnicity
- grade point average
- higher education enrollment date and major

Users may consent to receiving financial aid information from ONLY partner colleges, universities and companies. [Therefore, Naviance is pre-selecting colleges from its own financial partners.]

It uses software that tracks IP addresses to determine the User's location to deliver advertisements.

Web beacons, tracking software, reveal whether Users' messages have been received, opened, or acted upon.

Hobsons collects browsing behavior, date, time, pages and time on site visited, and how many times the User returns.

Users' IP addresses will be provided to service providers. Who is that for the SDP?

Collected information will be used to provide targeted offers, promotional materials from affiliates including marketing partners and third parties.

"Personal information voluntarily uploaded [as to a blog or on-line discussion] is publicly available and can be collected and used by others", including other web sites hosted by Hobsons. Ex. (Toledo)

You may opt out (see instructions 1200 words into their privacy statement), but in one example of a person opting out (Bogush), a response acknowledging the opt-op request was never returned by Hobsons.

If Hobsons' or Naviance's "assets are acquired" [by another business], Users' "personal information may be one of the transferred assets."

Stephen Smith, president of Hobsons K-12, claims that Naviance's tracking abilities can provide for colleges and universities students' "cognitive and non-cognitive attributes" [intellectual thought and more] "that wouldn't otherwise be available on a transcript." (Smith)

Consider your vote tonight on PSP-funded Resolution A-29.

When are you going to ask our students, parents and teachers if they want to be required to engage with Hobsons/Naviance, an intrusive, inequitable, expensive, profit-oriented company that claims superiority in judging our children's thoughts and abilities, without ever having been in their company?

Thank you.

Carol W. Heinsdorf, M.S.L.S., N.B.C.T.

Alliance for Philadelphia Public Schools (APPS) Research Committee member

12/18/14

Bibliography:

16 CFR Part 312; Children's Online Privacy Protection Rule Review; Project No. P104503 #00016

September 30, 2011 2:43am

Submission Number: 00016

Commenter: Taylor

State: California

Initiative Name: 16 CFR Part 312; Children's Online Privacy Protection Rule Review; Project No. P104503

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