



COPPA COMPLIANCE RATIONALE

School Official Exception Under COPPA

LEF Ed Platform

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1. Overview

The Children’s Online Privacy Protection Act (COPPA), 15 U.S.C. §§ 6501–6506 and its implementing regulations at 16 CFR Part 312, restricts the online collection of personal information from children under the age of 13. COPPA generally requires a website or online service operator to obtain verifiable parental consent before collecting, using, or disclosing personal information from a child.

However, the Federal Trade Commission (FTC) recognizes that school-authorized educational technology services operate in a fundamentally different context than consumer-facing websites.

The FTC has issued specific guidance confirming that schools may authorize the collection of student data by educational technology providers acting as “school officials” under FERPA, without requiring separate verifiable parental consent under COPPA, provided certain conditions are met.

This document explains how the LEF Ed platform qualifies for the school official exception under COPPA.

2. The COPPA School Official Exception

Under the FTC’s 2014 guidance and subsequent enforcement policy, an educational technology operator may rely on a school’s authorization in lieu of direct parental consent when:

1. The operator collects student information solely for the use and benefit of the school
2. The operator does not use the information for any commercial purpose unrelated to the educational services provided
3. The school has authorized the collection on behalf of the parent, consistent with FERPA’s school official exception (34 CFR § 99.31(a)(1))

This exception reflects the recognition that schools already act as agents for parents in educational matters, and that requiring separate COPPA consent from every parent for school-directed educational tools would be impractical and contrary to the statute’s intent.

3. How LEF Ed Qualifies

3.1 Teacher-Facing, Not Student-Facing

LEF Ed is a diagnostic and intervention routing tool designed exclusively for use by classroom teachers, principals, and school administrators. Students do not access, log into, or interact with the LEF Ed platform directly.

The platform’s sole purpose is to help educators analyze student assessment data, identify learning gaps, and route students to appropriate MTSS interventions. All data entry, viewing, and action-taking is performed by authenticated school personnel — not by children.

3.2 Collection for Educational Purpose Only

Student data enters the LEF Ed platform through two channels:

- Clever SSO roster sync — providing student names, grade levels, and classroom assignments as authorized by the school district
- Teacher data entry — assessment scores, reading levels, and intervention assignments entered by the teacher



All data collected is used exclusively to support the educational diagnostic and intervention services that the school has contracted for. LEF Ed does not use student data for any purpose unrelated to these educational services.

3.3 No Commercial Exploitation

LEF Ed does not:

- Sell, rent, or lease student data to any third party
- Use student data for targeted advertising or behavioral profiling
- Use student data for marketing of any kind
- Share student data with data brokers or analytics companies
- Build consumer profiles from student information
- Monetize student data in any form

3.4 School Authorization

Schools and districts that use LEF Ed execute a Data Processing Agreement (DPA) that establishes the Provider as a “school official” with a “legitimate educational interest” under FERPA (34 CFR § 99.31(a)(1)(i)(B)). This school authorization serves as the basis for COPPA compliance under the school official exception.

The DPA specifies the categories of data collected, the purposes for which data is used, security obligations, and data deletion procedures — ensuring that the school’s authorization is informed and specific.

4. Data Protection Measures

Consistent with COPPA’s requirement that operators maintain reasonable security measures, LEF Ed implements:

- 256-bit AES encryption for session management (iron-session)
- TLS 1.2+ encryption for all data in transit
- Role-based access controls (Teacher, Principal, Admin roles)
- Clever SSO integration for secure district authentication
- Administrative data deletion capability (per-student right to delete)
- Published Student Data Privacy Policy accessible from every authenticated page
- FERPA & COPPA Compliant badge displayed in platform header

5. Parental Rights

Even under the school official exception, parents retain important rights:

- Right to inspect: Parents may request to review the student data that LEF Ed holds about their child by contacting the school administration
- Right to deletion: Parents may request that their child’s data be deleted from the platform. Schools can exercise this right immediately through the administrative interface
- Right to refuse: Parents may opt their child out of the platform by notifying the school. The school is responsible for communicating this opt-out to Living Eden Frameworks

Living Eden Frameworks will cooperate with schools in honoring all parental requests in a timely manner.

6. Summary

LEF Ed qualifies for the COPPA school official exception because:

1. It is a teacher-facing tool — students never interact with the platform directly
2. It collects student data solely for the educational purposes authorized by the school
3. It does not use student data for any commercial purpose unrelated to education
4. Schools authorize data collection through a formal DPA, acting on behalf of parents



5. It implements robust data security and provides administrative deletion capabilities

This analysis is consistent with the FTC's published guidance on COPPA and educational technology, including the FTC's 2014 guidance letter to schools, subsequent staff reports, and the COPPA Rule's treatment of school-authorized operators.

This document is prepared by Living Eden Frameworks LLC for informational and compliance documentation purposes. It does not constitute legal advice. Living Eden Frameworks recommends consultation with qualified legal counsel for all regulatory compliance matters.