



DATA RETENTION POLICY

Student Data Lifecycle & Disposal Standards

LEF Ed Platform

Version 1.0 • March 2026 • Living Eden Frameworks LLC



1. Purpose

This policy defines how long Living Eden Frameworks LLC (“Living Eden”) retains student data processed through the LEF Ed platform, and how that data is disposed of when retention periods expire.

The retention periods in this policy are derived from the LEF Ai System Governance Charter (Version 2.0, Section 4.6 — Data Retention Schedule), which serves as the governing document for all data lifecycle decisions within the Living Eden Frameworks ecosystem.

2. Source of Authority

The retention schedule below is established in the **LEF Ai System Governance Charter, Section 4.6** (effective March 6, 2026). That section is designated as **binding policy** and states:

“This section governs all LEF Ai interactions with student data. It cannot be superseded by operational configuration, development priorities, or partner requests.”

Any amendments to this policy require review by the Principal Investigator (Zontonna Moore) and, where applicable, legal counsel.

3. Retention Schedule

Data Category	Retention Period	Disposal Method	Governing Standard
Individually identified student records (names, scores, tier assignments)	7 years post-project	Secure destruction	NIST SP 800-88
De-identified research datasets	Indefinite	Deposited in NSF-approved public repository (Zenodo / OSF)	FERPA 34 CFR § 99.31(b)
System operational logs (no PII)	3 years	Archived; summary statistics retained permanently	Internal policy
Audit trail records (diagnostic inferences, recommendations)	7 years post-project minimum	Secure destruction; summary records retained	NIST SP 800-88

4. Practical Application for LEF Ed

The retention schedule above was written for the full LEF Ai intelligence layer, which includes the LEF Ed diagnostic platform. Here is how each category maps to specific data in the LEF Ed platform:

4.1 Identified Student Records (7 years)

These are the records stored in the Turso database that contain student names or other identifiable information:

- Student profiles (name, grade level, classroom assignment)
- Assessment scores (MAP RIT scores, Benchmark Advance, iReady, F&P levels)
- Diagnostic classifications (SLIP, GAP, ROT error types)
- MTSS tier assignments (Tier 1, 2, or 3)



- Intervention group memberships
- Teacher-entered notes and observations

Retention clock: The 7-year period begins when the partnership with the school or district formally ends, not from the date the data was entered. During an active partnership, all student records are retained as needed to deliver the service.

4.2 De-Identified Research Data (Indefinite)

Aggregate, de-identified data used for research and system improvement. This data has all PII removed and meets the de-identification requirements in the Constitution (Section 4.2), including the minimum aggregation threshold of $n \geq 5$ students.

Examples: cohort-level diagnostic accuracy metrics, intervention outcome trends across districts, anonymized pattern data used in published research.

4.3 System Logs (3 years)

Server and application logs from Vercel that do not contain student PII. These include request logs, error logs, and performance metrics. Summary statistics (e.g., total API calls per month) are retained permanently after the raw logs are deleted.

4.4 Audit Trail (7 years)

Records of what the LEF Ed diagnostic engine recommended and why. Each audit record includes the timestamp, data inputs, reasoning basis, confidence score, and governing policy reference (per Constitution Section 4.3). These records are essential for accountability and are retained for a minimum of 7 years.

4.5 Discovery Mode Data (Session-Only)

CSV files uploaded during the free Discovery evaluation follow a distinct lifecycle that does not enter the retention schedule defined in Section 3:

- Raw CSV files: *Processed in volatile server memory and discarded immediately upon completion of analysis. Never written to disk or any database. Retention period: zero.*
- Analysis results: *Anonymized diagnostic output (letter-identified students, RIT scores, tier classifications, growth projections) is returned to the user's browser and exists only for the active session. No server-side copy is retained. Retention period: duration of browser session only.*
- Credential records: *The Discovery access credential (school name, email, access code) is stored in the platform database to enforce the 3-run limit. This record contains no student data. Retention period: subject to the system operational logs schedule (3 years) defined in Section 3.*

Discovery data does not generate audit trail records (Section 4.4) because no student-identifiable data is persisted. If a school transitions from Discovery to a paid subscription, all subsequent data flows through the Clever API integration and follows the standard retention schedule in Sections 4.1–4.4.

5. Early Deletion Rights

Retention periods define the maximum time data is kept. Data may be deleted earlier in the following circumstances:

- **Partner request:** A school or district may request deletion of all their student data at any time via the DPA termination process. Living Eden will delete within 60 calendar days and provide written certification.



- **Parent/guardian request:** Individual student records can be deleted at any time through the administrative interface (DELETE /api/admin/students/[studentId]). Schools process these requests on behalf of parents.
- **Contract termination:** Upon expiration or termination of a DPA, all identified student data is deleted within 60 calendar days unless the district requests a data export first.

6. Disposal Standards

When retention periods expire, data is disposed of according to NIST Special Publication 800-88 (Guidelines for Media Sanitization):

- **Database records:** Secure deletion from Turso (libSQL) with verification that records are no longer recoverable
- **Backup copies:** All backup instances containing the data are identified and purged within the same disposal window
- **Subprocessor data:** Written confirmation is obtained from each subprocessor (Vercel, Turso, Clever, Anthropic) that data has been deleted from their systems
- **Certification:** The Principal Investigator maintains a disposal log documenting what was deleted, when, and by what method

7. Relationship to Other Documents

This policy works alongside the following Living Eden Frameworks compliance documents:

Document	Relationship
LEF Ai System Governance Charter (Section 4.6)	Source of the retention schedule. This policy restates and applies those periods to the LEF Ed platform specifically.
Data Processing Agreement (DPA)	DPA Section 9 (Data Return and Deletion) and Section 10 (Data Retention) reference this policy. DPA governs per-partner deletion timelines.
Student Data Privacy Policy	The Privacy Policy (linked in the platform sidebar) summarizes retention practices for parents and educators. This document provides the detailed schedule.
Incident Response Plan	In the event of a breach, retention of forensic evidence may temporarily extend beyond standard retention periods as needed for investigation.
FERPA Data Audit	The audit spreadsheet tracks which technical controls are in place. This policy defines the lifecycle rules those controls enforce.

8. Policy Review

This policy shall be reviewed annually or whenever the LEF Ai System Governance Charter is amended. Any changes to retention periods must be reflected in both this policy and the DPA template.



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