Brownsville Independent School District

	General Function		
Agenda Category:	**Contracts/MOU**	**Board of Education Meeting:**	**08/05/25**

Item Title:	Contract between CareerCraft, Inc. and the Brownsville Independent School District	__X__	Action
		_____	Information
		_____	Discussion

BACKGROUND:

The Career & Technical Education (CTE) Department is requesting approval of a contract between CareerCraft, Inc. and Brownsville ISD. CareerCraft platform tracks student college, career, and military readiness (CCMR) status, CCMR Outcomes Bonus potential, and requirements for the ECHS and P-TECH Outcomes-Based measures established by the Texas Education Agency. The platform aligns to Texas accountability and designation standards, which allow stakeholders to access and evaluate student data.

FISCAL IMPLICATIONS:

Function 11 (Instruction) not to exceed $38,000

RECOMMENDATION:

Recommend approval of a contract between CareerCraft, Inc. and Brownsville ISD for the 2025-2026 school year in the amount not to exceed $38,000.

Approved for Submission to Board of Education:

Adrian Dorsett
Submitted by: Principal/Program Director

Recommended by: Asst. Supt./Exec. Dir.

Miguel Salinas
Reviewed by: Staff Attorney

Beatriz Hernandez
Approved by: Chief Officer

Dr. Jesus H. Chavez, Superintendent

When Necessary, Additional Background May Follow This.

∷ii iKeepSafe

iKeepSafe Product Profile
CareerCraft, LLC

CCMR Data Center

ECHS and P-TECH Monitor

Introduction

The *iKeepSafe* FERPA Privacy Program is available to operators and service providers of websites and online services, data management systems and other technologies that are, in whole or in part, intended for use in and by schools, and which may collect, store, process or otherwise handle student data.

This *iKeepSafe* Product Profile is intended to assist you in determining whether CareerCraft Technology Platforms complies with FERPA. It indicates that CareerCraft has been assessed for alignment with the iKeepSafe FERPA Guidelines.

Product Overview

The CareerCraft platform tracks student college, career, and military readiness (CCMR) status, CCMR Outcomes Bonus potential, and requirements for the ECHS and P-TECH Outcomes-Based Measures established by the Texas Education Agency. The platform calculations align to Texas accountability and designation standards, which allow stakeholders to access and evaluate student data. The platform permits district and school staff to view projected metrics and performance indicators.

careercraft.com

Agreement

A. As related to the Family Educational Rights and Privacy Act ("FERPA") (20 U.S.C. Section 1232g), CareerCraft agrees:

1. Student records obtained by CareerCraft from an educational institution continue to be the property of and under the control of the educational institution. The educational institution retains full ownership rights to the personal information and education records it provides to CareerCraft.

2. CareerCraft users retain possession and control of their own original content that they submit to CareerCraft.

3. CareerCraft will not use any information in a student record for any purpose other than those required or specifically permitted by the CareerCraft User Agreement and Privacy Policy.

4. Parents, legal guardians, or eligible students may review personally identifiable information in the student's records and correct erroneous information by contacting their educational institution or teacher. Additionally, CareerCraft users may access personal information in their profile by signing into their CareerCraft account. To correct, update, or delete personal information in their profile, CareerCraft users should reach out to the CareerCraft help center to make the appropriate changes.

5. CareerCraft is committed to maintaining the security and confidentiality of student records. Towards this end, we take the following actions:
   a. we limit employee access to student data to only those employees with a need to such access to fulfill their job responsibilities;
   b. we conduct background checks on our employees that may have access to student data;
   c. we conduct regular employee privacy and data security training and education; and
   d. we protect personal information with technical, contractual, administrative, and physical security safeguards in order to protect against unauthorized access, release or use.

6. In the event of an unauthorized disclosure of a student's records, CareerCraft will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.

7. CareerCraft will delete or de-identify personal information when it is no longer needed, upon expiration or termination of our agreement with an educational institution with any deletion or de-identification to be completed according to the terms of our agreement with the educational institution, or at the direction or request of the educational institution.

8. CareerCraft agrees to work with educational institutions to ensure compliance with FERPA and will ensure compliance by providing parents, legal guardians or eligible students with the ability to inspect and review student records and to correct any inaccuracies therein as described above.

9. CareerCraft prohibits using personally identifiable information in student records to engage in targeted advertising.

10. CareerCraft will not make material changes to the CareerCraft Terms of Service Agreement or Privacy Policy, including making significant changes impacting the collection, use, disclosure or retention of data collected without prior notice to the educational user.

Data Access and Review Process

CareerCraft collects data on behalf of schools. Any party wishing for CareerCraft to provide or correct their personal information can make a request either via their school or directly to CareerCraft and as legally permitted, CareerCraft will provide or correct the information as instructed and in a timely manner.

A data access request which asks CareerCraft to provide, correct or delete personal information is lodged via an email to *info@careercraft.com*. Depending on the nature of the request, CareerCraft may require the requestor to provide information to verify their identity, and/or be an authorized agent of their school.

Security Protocols

CareerCraft has a comprehensive security program in place designed to protect the confidentiality, integrity and availability of systems, networks and data. The following is a general overview of data security protocols:

Data in Transit

Access to the CareerCraft service occurs via encrypted connections (HTTP over TLS, also known as HTTPS) which encrypt all data before it leaves CareerCraft's servers and protects that data as it transits over the internet.

Data at Rest

All personally identifiable information is encrypted at rest using modern encryption algorithms such as AES-256 or stronger.

Data Center Security

CareerCraft uses AWS Data Centers and Heroku. These centers conform to the following:

AWS is a secure, durable technology platform with industry-recognized certifications and audits: PCI DSS Level 1, ISO 27001, FISMA Moderate, FedRAMP, HIPAA, and SOC 1 (formerly referred to as SAS 70 and/or SSAE 16) and SOC 2 audit reports. Their services and data centers have multiple layers of operational and physical security to ensure the integrity and safety of the housed data.

Please see more information below in the available link:

Amazon Web Services (AWS) https://aws.amazon.com/security/

AWS S3: https://docs.aws.amazon.com/AmazonS3/latest/userguide/bucket-encryption.html (Enabled with Amazon S3-managed keys)

Heroku Postgres:
(https://devcenter.heroku.com/articles/security-and-compliance-resources-and-features)

Personnel

Background Checks: All employees with access to student data have undergone criminal background checks.

Training: Employees of CareerCraft receive annual privacy and security training that includes information about FERPA.

Access: Access to student data is role-based; limited to those employees who need access to perform job responsibilities.

Access to Audit

Once per year, CareerCraft will provide schools with:

X   audit rights to the **school's data**

X   access to the results of CareerCraft, or its **third-party security audit**

Data Breach

In the event of an unauthorized disclosure of a student's records, CareerCraft will promptly notify the school without undue delay or as required by the applicable law. Notification shall identify:

a.   the date and nature of the unauthorized use or disclosure;
b.   the Private Data used or disclosed;
c.   general description of what occurred, including who made the unauthorized use or received the unauthorized disclosure;
d.   what CareerCraft has done or shall do to mitigate any effect of the unauthorized use or disclosure;
e.   advice to the impacted user on how they can best protect themselves.
f.   what corrective action CareerCraft has taken or shall take to prevent future similar unauthorized use or disclosure; and
g.   who at CareerCraft the user can contact. CareerCraft will keep the user fully informed until the incident is resolved.

CareerCraft will notify impacted user (s) within 72 hours upon the discovery of a breach of security that

results in the unauthorized release, disclosure or acquisition of student information.

Data Deletion

CareerCraft stores user personal information for as long as it is necessary to provide CareerCraft to the user. Personal information associated with the user account will be kept until the account is deleted or until CareerCraft no longer needs the data to provide its products and services.

CareerCraft may have to retain some information after your account is closed, to comply with legal obligations, to protect the safety and security of the community or CareerCraft, or to prevent abuse of CareerCraft's terms in the Terms of Service. A user may delete their account at any time by contacting their school directly or by contacting CareerCraft at *info@careercraft.com*.

Research

CareerCraft may use data which has been de-identified and/or aggregated for product development, research, analytics and other purposes, including for the purpose of analyzing, improving, or marketing CareerCraft. On certain occasions, CareerCraft may share this data with service providers to support the operation of the Services, such as through document management, data hosting, and provisioning customer service tools related to CareerCraft. CareerCraft will only share de-identified information should CareerCraft wish to demonstrate how CareerCraft is used, its efficacy, or otherwise provide information or marketing materials related to CareerCraft. CareerCraft may share aggregated and/or non-personally identifiable information publicly (such as statistics about visitors, and website traffic patterns).

Third Parties

CareerCraft does not sell, trade, lease or loan the personal information it collects or maintains, in the course of providing the service, to any third party for any reason, including direct marketers, advertisers, or data brokers.

CareerCraft contracts with other third-party companies to perform business functions or services on their behalf and may share PII with such third parties as required to perform their functions. CareerCraft have agreements in place with all third parties with access to student personal information to ensure they only use the information for purposes necessary to deliver the authorized service and to ensure they maintain the confidentiality and security of the information. The agreements align with CareerCraft's data privacy and security policies and expectations.

CareerCraft utilizes the following third-party vendors:

Third Party	Purpose	Information Shared
Heroku	Server hosting, managed database services	The lionshare of student data is stored and served out of here
Netlify	Frontend hosting	
Amazon Web Services	Uploaded file storage	Whatever district staff may upload, which has included files such as certifications, PDFs or scans of test results and even receipts for certifications. They also upload data exports from their SIS or from third parties like CollegeBoard, ACT, etc.
CloudAMQP	Backend task queuing	Generally only internal IDs are used here
Cloudinary	Image hosting	If a student uploaded a profile picture, it would have been hosted here. Usage in the present day would be district staff storing their own profile photos
Sentry	Error monitoring and management	Generally internal IDs
New Relic	Performance tracking	Endpoint performance metrics and while I haven't seen any PII here, our internal student IDs may be included in query params on slow transactions
SFTPToGo	Data sharing with Skyward	Student demographic data, enrollments/withdrawals, and any postsecondary licenses/certifications they may have earned
Postmark	Transactional emails	Reset password links, student names (for personalization) when we still worked with students, staff names (for personalization) for password reset and any notifications
Google Drive	Internal File Sharing	Select student data files (as examples). For internal staff reference only where only the CTO and VP of Strategy & Innovation have access

Product Data List

Student data collection by CareerCraft includes the following:

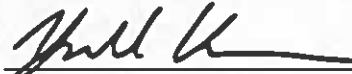|	DATA Collected for Operation	General Purpose of Data Collected
1	STUDENT FIRST and LAST NAME	Required to support Product Functionality
2	STUDENT EMAIL ADDRESS	Required to support Product Functionality
3	STUDENT PHONE/MOBILE NUMBER	Required to support Product Functionality
4	STUDENT EMAIL ADDRESS	Required to support Product Functionality
5	OTHER STUDENT ID	Required to support Product Functionality
6	STUDENT AGE/DOB	Required to support Product Functionality
7	STUDENT ETHNICITY	Required to support Product Functionality
8	STUDENT GENDER	Required to support Product Functionality
9	SCHOOL NAME	Required to support Product Functionality
10	SCHOOL ADDRESS	Required to support Product Functionality
11	GRADES	Required to support Product Functionality
12	OTHER PERSISTENT IDENTIFIER	Business Analytics

Accuracy Statement

CareerCraft hereby confirms the accuracy and truthfulness of all information contained in this profile and has authorized iKeepSafe to make the profile available to any interested teachers/schools.

Signed and agreed:

(Signature)

Yeeland Chen
Chief Technology Officer
CareerCraft, LLC

08/11/2022

CareerCraft has been reviewed and found in alignment with iKeepSafe's FERPA Privacy Program Guidelines as indicated by this product profile. CareerCraft has been awarded the iKeepSafe FERPA Certification.

DocuSigned by:

Amber Lindsay

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(Signature)
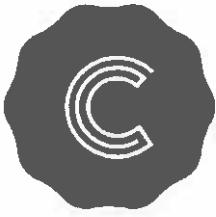
Amber Lindsay
President & CEO
iKeepSafe

08/11/2022

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ESTIMATE

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Austin, TX 78723

accounting@careercraft.com
+1 (737) 703-9163
https://careercraft.com

Bill to
Brownsville ISD

Ship to
Brownsville ISD

Estimate details

Estimate no.: 1310
Estimate date: 02/24/2025
Expiration date: 10/31/2025

#	Date	Product or service	Description	Qty	Rate	Amount
1.		**Onboarding Package**	2 Onboarding Sessions and 1 Enablement Meeting	1	$1,500.00	$1,500.00
2.		**CareerCraft Platform**	Unlimited users for your entire school district. CCMR Data Center and CTE Monitor modules included.	1	$10,000.00	$10,000.00
3.		**CareerCraft Platform Per Student Cost**	Individual student data tracking for all modules in subscription	17208	$1.00	$17,208.00
4.		**ECHS Monitor**	OBM data tracking for 7 CCRSM programs	1	$10,000.00	$10,000.00

Subtotal	$38,708.00
Discount	-$1,500.00
Total	**$37,208.00**
Expiry date	10/31/2025

Note to customer

CCMR Data Center + CTE Monitor for one year. Plus, ECHS or P-TECH Monitor for up to 7 CCRSMs.

Accepted date

Accepted by