

FERPA Compliance Statement

Doctor Dyslexia Dude LLC · Decision Capture Platform · Effective Date: March 2026 · Version 2.3 Patent Pending — U.S. Provisional Application No. 63/955,653

How Student Privacy Is Protected

Student session records — the words worked on, spelling decisions made, and reflections written — are stored using server-generated anonymous session IDs. No student name is written to any session record. Teachers may optionally create a roster of short labels (nicknames or first names) to control who may enter their classroom; those labels are stored under the teacher's account and are never linked to session records or learning data. Full legal names and student ID numbers should never be entered anywhere on this platform.

1. Overview

Doctor Dyslexia Dude LLC ("Company") operates the Decision Capture Platform, a structured spelling-decision documentation system designed for use by teachers, tutors, reading specialists, and school administrators. The Platform records student spelling-decision sessions and provides educator-facing infrastructure that enables teachers to identify and track patterns in those decisions over time. The Company is committed to compliance with the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g, and its implementing regulations at 34 C.F.R. Part 99. This statement describes the Platform's data architecture, the Company's role under FERPA, and the responsibilities of educational institutions that deploy the Platform.

2. The Company's Role Under FERPA

When the Platform is deployed by an educational institution (a "School"), the Company acts as a School Official with a legitimate educational interest, as defined under FERPA (34 C.F.R. § 99.31(a)(1)). The Company functions as a contractor on behalf of the School and is subject to the same FERPA obligations as the School's own employees. The Company does not sell, rent, or disclose education records to third parties for commercial purposes. Session data is used solely to deliver the Platform's core functionality.

3. Data Architecture

3a. Session Records

All student spelling session records are stored using server-generated anonymous session IDs. No student name, alias, or other identity field is written to any session record. The session ID is an opaque random token generated at record save time; it carries no identity information and cannot be used to reconstruct who performed a session.

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3b. Teacher Roster

Teachers may optionally create a classroom roster containing up to seven short labels (nicknames or first names). These labels are stored under the teacher's account in the platform database solely for the purpose of controlling which students may enter the classroom. Roster labels are never written into session records and are never linked to learning data or session history. Teachers are instructed not to enter full legal names or student ID numbers in the roster.

3c. Student Entry Process

When a student enters a label to access the classroom, that label is matched against the teacher's roster. It is then converted to a one-way cryptographic fingerprint (SHA-256) used solely to recognize returning students, so they reclaim their existing session slot. This fingerprint is not reversible and cannot be used to reconstruct the original label. The label itself is not stored beyond the matching step.

3d. What the Platform Does Not Store in Session Records

- Student name, alias, or label in any session record
- Student first name, last name, or ID number in any session record
- Social Security numbers
- Dates of birth
- Home addresses
- Financial information
- Disciplinary records
- Photographs or biometric data

4. Data Use and Retention

- Session records are used solely to provide documentation and review functionality for educators.
- The Platform may generate observational summaries or pattern reports from session data to support instructional review.
- Records are accessible only to the authenticated teacher associated with the classroom.
- The Company does not build profiles, serve advertising, or use data beyond Platform functionality.
- Schools may request deletion of all records at any time via info@doctordyslexiadude.com.
- Upon written request, all records are deleted within 30 days.
- Session records are retained for a maximum of five (5) years from the date of creation.

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5. Data Security

- Data is stored in a hosted Supabase (PostgreSQL) database with row-level access controls.
- All data in transit is encrypted using TLS 1.2 or higher.
- Teacher authentication uses secure email magic links (no passwords stored).
- Student access is controlled via teacher-issued classroom codes combined with roster matching.
- API keys and credentials are stored as environment variables and never exposed in source code.
- API endpoints are rate-limited, with progressive lockout on repeated failed attempts.
- All authentication and data events are audit-logged.
- Security headers (CSP, HSTS, X-Frame-Options, X-Content-Type-Options) are applied to every server response.

6. Parental Rights and Access

The Company supports Schools in fulfilling FERPA rights, including:

- Right to inspect and review records — Schools may request data exports by session ID.
- Right to request amendment — Records may be corrected or deleted upon verified School request.
- Right to consent to disclosure — No third-party disclosure occurs without School authorization, except as required by law or as disclosed in Section 8 (Subprocessors).

Because session records are keyed by anonymous session IDs rather than student names, Schools wishing to associate records with specific named students must maintain that association in their own systems and provide the relevant session ID when making a data access or deletion request.

7. COPPA Applicability

The Platform is designed for use with students in Grade 5 and above but may be used with younger students at the discretion of educators or parents. The Platform does not collect personal information from students in session records — no student name, ID, date of birth, contact information, or sensitive personal data is stored in any session record. All accounts are created and managed by teachers, tutors, or parents. Students do not register independently. Teachers may maintain a roster of short labels under their account for classroom access control. Students may enter a short label at classroom entry to match their session; that label is not retained in any session record. Schools and users remain responsible for providing any required parental notice under COPPA (15 U.S.C. § 6501 et seq.).

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8. Subprocessors

Subprocessor	Purpose	Data Handled	Location
Supabase	Database (session records, teacher accounts, rosters)	Session records (anonymous IDs), teacher email, roster labels (teacher account only)	United States
Resend	Transactional email (verification links, trial notifications)	Teacher email address only	United States
Railway	Application hosting	All platform data in transit	United States
Anthropic	AI coach and instructional analysis features	Grade level, word, pronunciation, spelling decisions, session reflections. No student name or identity field.	United States

All AI processing using the Anthropic API is performed under a data processing agreement. Anthropic does not use student session data to train its models.

9. School Responsibilities

When deploying the Platform in a school or district setting, the School is responsible for:

- Ensuring that annual FERPA notices to parents disclose the use of service providers with access to education records, including Doctor Dyslexia Dude LLC.
- Obtaining any required parental consent under COPPA for students under 13.
- Ensuring that staff use only nicknames or first names in the roster — never full legal names or student ID numbers.
- Maintaining the mapping between session IDs and named students in the School's own systems if such a mapping is needed.
- Notifying the Company of any changes in applicable legal requirements that affect data handling obligations.

10. Contact

Doctor Dyslexia Dude LLC, Shawn Anthony Robinson PhD Co-founder,
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Schools needing a Data Processing or Business Associate Agreement may request one above. This statement is informational only and not legal advice — consult qualified counsel for FERPA/COPPA compliance. Material updates will be communicated in advance.