



# FERPA, COPPA & CIPA Compliance

Compliance summary for district technology & privacy teams • Last updated July 1, 2026

This document is written for the teams who review Chou Chou Teach — including those deciding whether to unblock it. Our goal is to give you the least to review: because the app collects almost no student information, most questions a privacy review asks simply don't apply. The current version is always at [chouchouteach.com/schools/compliance](https://chouchouteach.com/schools/compliance).

<b>STUDENT ACCOUNTS</b> <b>None — students never log in</b>	<b>STUDENT DATA</b> <b>First name + avatar only</b>
<b>ADS / DATA SALES</b> <b>None, ever</b>	<b>DATA AGREEMENTS</b> <b>Signed on request (SDPC / NDPA)</b>

## Who we are & our role

Chou Chou Teach is a classroom points and behavior app for K-12 teachers. Teachers award positive points for behaviors they define; the app displays running tallies. When Chou Chou Teach processes student information, it does so as a **school official / service provider** acting under the direction of the teacher and their school, for the sole purpose of providing the service. The school remains the owner of, and decision-maker for, any student records entered.

## FERPA — Family Educational Rights and Privacy Act

FERPA governs personally identifiable information from education records. Chou Chou Teach stays well inside its requirements:

- **Data minimization.** A student record is a first name (or nickname) and an avatar. No last names, photos, birthdates, addresses, contact information, government identifiers, or grades.
- **School official exception.** We act under the school's direction and use student information only to provide the service — the basis under 34 CFR § 99.31(a)(1).
- **No secondary use.** Student information is never sold, never used for advertising, and never used to build profiles.
- **School control & deletion.** Teachers can delete a class, its students, and its points at any time in the app; districts can request deletion of associated data by email.
- **Written agreements.** We will sign your district's Data Privacy Agreement to memorialize these terms.

## COPPA — Children's Online Privacy Protection Act

COPPA governs online collection of personal information from children under 13. Chou Chou Teach is built so this collection effectively doesn't happen the way COPPA is concerned about:

- **Children don't use the app.** Students have no accounts and never sign in, type, or interact with Chou Chou Teach. Only the teacher operates it.
- **No direct collection from children.** The limited student information present is entered by the teacher, not gathered from the child.
- **School consent.** Where a small amount of student information is processed, the school provides consent on parents' behalf for educational use, consistent with the FTC's COPPA guidance for schools.

- **No ads or tracking of children.** There is no behavioral advertising and no third-party ad tracking anywhere in the product.

## CIPA — Children’s Internet Protection Act

CIPA requirements — internet filtering and an internet safety policy — apply to the school or district, not to individual apps. Chou Chou Teach makes CIPA compliance easy because it contains nothing a filter would need to block:

- No advertisements or sponsored content.
- No open chat, messaging, or direct communication between users.
- No public or user-generated content feeds students could browse.
- No links out to unfiltered or external third-party content.
- Nothing marketed or sold to students.

## Exactly what we collect

This is the complete inventory of what Chou Chou Teach stores. The student-facing footprint is intentionally tiny.

Data	About	Why
First name or nickname	Student	Label the point card the teacher taps in class.
Avatar (fixed set of cartoon characters)	Student	Let students recognize their own card.
Points / behavior tallies	Student	The core function — tracking positive behavior.
Name, email, profile image	Teacher	Create the teacher account and sign them in.
Class names, behaviors, tool prefs	Teacher	Store the teacher’s own classroom setup.
Subscription status / Stripe ID	Teacher	Manage billing. Card numbers never reach us.
Server logs (IP, browser type)	Visitor	Keep the service secure and reliable.

We do **not** collect student last names, photos, birthdates, addresses, phone numbers, emails, government identifiers, grades, or location data.

## Subprocessors

We share data only with the vetted providers that run the service. None may use it for their own purposes.

Provider	Role	Data
Cloudflare	Hosting, app runtime, and database (D1).	All application data at rest; server logs.
Google	Optional teacher sign-in (OAuth).	Teacher name, email, image (only if used).
Stripe	Subscription payment processing.	Teacher billing only. No student data.

## Security

- Data is encrypted in transit (HTTPS/TLS) across the service.
- Auth tokens (verification, reset) are stored only as hashes; passwords use salted PBKDF2 hashes, never plain text.
- Access to teacher and class data is scoped to the authenticated teacher who owns or co-teaches the class.
- Hosting and database run on Cloudflare, which maintains SOC 2 and ISO 27001 certifications.

## Data retention, deletion & agreements

We retain data only while an account is active. Teachers can delete a class — and all its students and points — at any time in the app. We're glad to complete your district's paperwork, including standard **SDPC** and **National Data Privacy Agreement (NDPA)** forms, and can **allowlist sign-in** to your Google Workspace domain so only approved staff accounts can access the app.

Reviewer contact: [support@chouchoteach.com](mailto:support@chouchoteach.com). We aim to respond to district reviews within two business days.