

PIA Meeting for **Achieve – MacMillan Learning**

Privacy Tracking:

- ☐ PIA number: 2024-001
 - ☐ Date of meeting: via correspondence
 - ☐ Present during meeting: n/a
 - ☐ These notes taken by: Ernest Soares & Marie Loughin
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Questions for Initiative Lead

- ☐ Has an SFU IT security professional determined that this software employs reasonable security arrangements (if so, who?):
 - **No, not required as no new program is integrated into the SFU systems.**
- ☐ Has a contract been signed with vendor (if yes, send to privacy team for review with these answers):
 - **Not between SFU and MacMillan. However, students sign up with MacMillan Learning and complete the log-in process via Canvas to activate the course materials.**
- ☐ Was SFU's Privacy Protection Schedule (PPS) or Cloud Privacy Protection Schedule (CPPS) appended to the contract:
 - **N/A**
- ☐ Purpose/Objective of initiative:
 - To provide students with additional materials (practice quizzes, videos, learning apps) to support their learning in Stat 203. (May wish to use Achieve in future Stat 201, 203, and 205 as well – they use the same textbook. Achieve for a different textbook could also be used for Stat 100.)
 - Macmillan Learning's Achieve is a comprehensive platform designed to promote active learning and classroom engagement. It is equipped with robust tools, including pre-built assessments, engaging e-books, videos, interactives, and personalized learning methods--all aimed at enhancing student success. The result is a flexible, integrated suite of tools proven to be engaging for students of all levels of preparedness, paired with actionable insights that make students' progress toward outcomes clear and measurable. Achieve is fully accessible and can be integrated with your district LMS. Achieve's assessment capabilities include an expansive question library, which includes built-in coaching tools--hints, detailed feedback, and fully worked solutions--to guide students toward the correct answers. There's a variety of question input types aimed to match the pedagogical intent of the content being assessed. Teachers can also customize the grading policy on assessments to allow for variations in attempts, solution visibility and submissions, including high-stakes options. Additionally, Achieve offers Learning Curve Adaptive Quizzing, which provides individualized question sets and feedback based on each student's correct and incorrect responses. All the questions are tied to the e-book to encourage students to use the resources at hand. Available online and off-line, interactive e-books include content to engage and deepen student understanding of topics, as well as helpful study features, like highlighting, taking notes, and searching for specific topics or keywords.

- The account creation and login process will work as follows:
 - Students register for a MacMillan Learning account by giving their first and last name, SFU email address, country, institution (SFU), and setting up three security questions.
 - They then register for Achieve for a particular class using a class code supplied by Achieve. They also supply the Access Code that came with their textbook.
- Non-personal information elements involved:
 - **Device Information**
 - IP address and city of origin
 - Type of browser and mobile device
 - Metadata on user interaction with Achieve (use statistics)
 - **Other**
 - Student app username for Achieve
 - Student app password (salted, hashed, and key stretching employed) for Achieve
 - Vendor/app assigned student ID number for Achieve
- Personal information (PI) elements (e.g. email addresses, IP addresses, assignment work):
 - What personal information is collected?
 - **From the Achieve Schedule of Data:**
 - **Personal information**
 - First and/or last name
 - SFU computing ID email address
 - **Education information**
 - SFU computing ID email address
 - Student generated content – Achieve quizzes, assignments
 - Student course grades in Achieve assessments.
 - **Personal opinions**
 - Student responses to Achieve surveys – The ones I looked at are directed at student’s feelings about the course and their performance in it.
 - Is the information necessary for initiative?
 - **Yes.**
 - Is the information sensitive?
 - **It will NOT require that the student reveal deeply personal information, but will contain grades and possibly student sentiments about the course and their own performance in it.**
 - What information is newly collected by the initiative, vs information already collected and newly used (eg. Student email addresses are already known, and may be newly used for this software):
 - **IP address and city of origin (although SFU may have access to this, I do not)**
 - **Type of browser and mobile device**
 - **Metadata on user interaction with Achieve (use statistics)**
 - **Vendor/app assigned student ID number**

- ☐ Student app username for Achieve
 - ☐ Student app password (salted, hashed, and key stretching employed) for Achieve
 - ☐ Student responses to Achieve surveys – The ones I looked at are directed at student’s feelings about the course and their performance in it.
 - ☐ Student generated content – Achieve quizzes, assignments
 - ☐ Student course grades in Achieve assessments.
- ☐ How and from whom is the newly collected PI collected:
 - Directly or indirectly from the individual:
 - **Directly**
 - Where will the Advisory Notice be posted:
 - **On Canvas along with information about Achieve.**
 - Advisory notice language to be used:

By enrolling in this program, you acknowledge and consent to the disclosure of the following personal information to the MacMillan Learning and agree to have your personal information (which may include your name, your email address, location, and institution of study) stored in compliance with MacMillan Learning's personal information practices, accessible through the following link
[https://store.macmillanlearning.com/us/privacy-notice.](https://store.macmillanlearning.com/us/privacy-notice)

The disclosure of the aforementioned information is necessary to grant you access to and engagement in the Achieve program developed and provided by MacMillan Learning.

Furthermore, you acknowledge that MacMillan Learning is headquartered in New York, New York, USA and is not subject to the regulations of the British Columbia Freedom of Information and Protection of Privacy Act (RSBC 1996, c. 165). Therefore, the rights stipulated therein may not be applicable or enforceable concerning MacMillan Learning.

- ☐ How will the PI be used:
 - Registration and use of Achieve
- ☐ Who will have access to the PI:
 - **MacMillan Learning only.** (They “...handle School Data as a processor for our customers, subject to applicable privacy and data protection laws, including ... the Freedom of Information Privacy Protection Act (FIPPA) in Canada.)
 - They do not share information with advertisers.
 - **TAs and course faculty**
- ☐ Any foreseen disclosures of PI:
 - **None beyond what has been indicated above.**

Questions for Privacy Team:

- ☐ Legal Authority for collection, use, and disclosure
 - Collection: 26(c)
 - Use: 32(a)

- Disclosure: 33(2)(d)
- Privacy risks and responses/mitigations:
 - Physical security risks:
 - n/a
 - Over-collection risks:
 - n/a
- Do the decisions made affect an individual:
 - no
 - Ensure accuracy and completeness:
 - n/a
 - Retained at least 1 year:
 - n/a
 - Disposal:
 - n/a
- Process to correct PI: SFU has a process in place to correct or annotate an individual's personal information upon request: <https://www.sfu.ca/archives/fippa/changes-corrections.html>
- Role designated accountable:
 - Derek Bingham, Chair and Professor, Department of Statistics and Actuarial Science, Simon Fraser University, derek_bingham@sfu.ca