# School Communication Application (TalkingPoints)

Internal Audit Assessment Report
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### **EXECUTIVE SUMMARY**

### Why We Did This Assessment

Our objective was to review and assess the district's:

- evaluation of past and current communication applications, associated risks, and plans to mitigate those risks;
- evaluation of options and potential solutions;
- procurement and selection process for the new communication application;
- evaluation of the selected vendor's privacy, security, and controls over student information; and,
- implementation process for a new communication application.

This assessment was included in the 2023-2024 Annual Audit Plan.

### Observations and Conclusion

Our overall conclusion is that TalkingPoints has demonstrated effectiveness as a two-way communication application for the district.

The application was selected by management based on their evaluation and comparisons of past and current communication applications and positive results of a pilot program at district.

We verified TalkingPoints has established policies on privacy, security, and controls over student information.

### Result and Recommendation

We noted inadequate control over deletion of messages from the *Admin Inbox*. The application allowed messages to be deleted from a school's *Admin Inbox* by a user with *District Viewer* access privileges.

Per Management, deleted messages from the *Admin Inbox* are still accessible in *All Messages*. Messages cannot be completely deleted from the application. Messages are archived and stored in the application for future retrieval.

We made no recommendation at this time as the vendor (TalkingPoints) resolved this finding with our help in testing by removing the deletion feature for users with *District Viewer* access.

This report has been discussed with management and they have prepared their response which follows.

### **BACKGROUND:**

The District communicates with stakeholders through a number of different means. These include:

### With Staff:

- ConnectOrange (School Messenger) phone or email or text one-way messaging. (Communication is translated into Spanish, Portuguese, and Haitian Creole. If ConnectOrange system is down Schools manage communications via individual outreach to staff and direct outreach to parents and guardians at the classroom level.)
- ➤ District Internet and Intranet site (*Automatically translated at the user's discretion into 25 languages.*)
- Canvas Learning Management System (LMS) global announcements
- ➤ Launch Pad announcements
- OCPS Official Digital Learning for Staff Facebook Group
- Outlook email
- Deputy Superintendent newsletters to administrators

### With Students:

- District-provided email address
- Canvas InBox
- Canvas LMS global announcements
- ➤ Launch Pad announcements
- Skyward Student Access

### With Parents, Guardians, and Families:

- ConnectOrange (School Messenger) phone or email or text oneway messaging
- Skyward Family Access
- ➤ Two-way multilingual *Short Message Services (SMS)* and *MultiMedia Messaging Service (MMS)* messaging such as:
  - Remind 101 (Not approved)
  - Class Dojo (Not approved)
  - What's App (Not approved)
  - Best School Ever (Not approved)
  - Bloomz (Not approved)

The District communicates with staff, students, parents, guardians, and families through a number of different means.

Some school personnel use unapproved messaging apps.

- Talking Points (Approved application started on July 1, 2023 scope of this Assessment)
- District Internet site
- Canvas Parent LMS global announcements
- > OCPS Parent Portal announcements
- > OCPS Official Digital Learning for Families Facebook Group
- Social media
- Local news outlets

The district also uses a variety of communication methods with community members, Partners-In-Education and vendors. These include the district's website, emails, social media and local news outlets.

### **OBJECTIVE, SCOPE AND METHODOLOGY:**

### **Objective**

Our objective was to review and assess the district's:

- evaluation of past and current communication applications, associated risks, and plans to mitigate those risks;
- evaluation and analysis of options and potential solutions;
- procurement and selection process for the new communication application;
- evaluation of the selected vendor's privacy, security, and controls over student information; and,
- implementation process for the new communication application.

### Scope

We conducted a detailed assessment of the district's new two-way communication application - TalkingPoints.

### **Methodology**

This is a strategic assessment of school communication applications and the recently-approved two-way communication application, TalkingPoints. Strategic assessments are brief, focused analyses of key data in an area of organizational risk or concern.

The assessment objective was to review and assess the district's evaluation and analysis process of communication applications.

Details of our assessment methodology included:

- Discussions with *Family Engagement and Digital Learning Outreach* (management) division TalkingPoints' staff;
- Reviews of evaluation documents such as:
  - past and current communication applications and associated risks,
  - *Risk Register* 2023-24
  - internet surveys and comparisons report on different communication applications
  - the TalkingPoints pilot program summary implementation process, results, feedback, and survey;
- Reviews of procurement and payment documents such as:
  - exemption request and approvals
  - iBuy process and approvals
  - Board recommendation documents
  - contract
  - purchase orders
  - invoices
  - general ledger payments in SAP;
- Reviews of data security documents such as:
  - Notice of Disclosure Agreement (NDA)
  - Service Organization Control (SOC) 2 Type II Report
  - OCPS Third Party Information Security Standard
  - TalkingPoints' privacy, security, and cloud security policies
- Obtained temporary view-only access of TalkingPoints;
- Reviews of the process for access authorization for TalkingPoints, and the monitoring process for the access list;
- Tests of 10 terminated or resigned employees' current access status of TalkingPoints through SAP ZH330 Terminational and Resignation Report -ZG and ZH039 Employee Organization Unit;
- Explored TalkingPoints application and confirmed flagged messages, reports, and data completeness and accuracy;
- Reviews of the district's monitoring of Flagged Messages reports, and the reporting, communicating, and resolving process for any flagged messages of concern;

We reviewed management's evaluation of communication applications, procurement and payment documents, and data security documents.

We obtained temporary view-only access of TalkingPoints to explore communication application.

- Tests of six selected schools' resolution processes for those situations where the school noted flagged messages for further evaluation, and requests of schools' principals for their resolution process documents;
- Reviews of training documents for the use of TalkingPoints;
- Reviews of the contract to confirm Family Educational Rights
   and Privacy Act (FERPA) clause and other laws and regulations
   of securities clauses, and reviews of the district's and
   TalkingPoints' monitoring process for FERPA compliance;
- Confirmation of TalkingPoints' disaster recovery plan, business continuity plan, and backup plan clauses in contract; and,
- Reviews of the draft OCPS Instructional Continuity Plan.

We also reviewed
TalkingPoints' flagged
messages reports, training
documents, and contract.

### **ASSESSMENT RESULTS & CONCLUSION:**

### **Overall Conclusion:**

Our overall conclusion is that TalkingPoints has demonstrated effectiveness as a two-way communication application for the district. The application was selected by the management based on evaluation and comparisons of past and current communication applications, and positive results of a pilot program.

We verified TalkingPoints has established policies on privacy, security, and controls over student information.

### **Management's Evaluation Considerations:**

- Current communication applications or platforms or products:
  - either do not allow for two-way communication (i.e.
     School Messenger, Skyward Family Access),
  - and/ or do not support SMS text messaging (i.e. Canvas Parent InBox),
  - and/ or do not support multilingual translation (i.e. Canvas Parent InBox)

As a result, school staff and teachers are using a variety of free models which has led to **inconsistency** among schools and confusion for families.

Our overall conclusion is that TalkingPoints is an effective two-way communication application for the district.

Management identified three unmet needs:

- Two-way communication
- Support SMS text messaging
- Support multilingual translation

- Current free communication applications are not approved by anyone at the district as they have not been gone through the OCPS software request process for approvals. Thus, there are no contracts, or non-disclosure agreements (NDA) and no data sharing agreements with these vendors.
- Current free applications do not have functionality to archive or view past messages. Thus, no ability to retrieve and respond to public records requests, if any.
- ➤ Other communication applications or platforms:
  - do not have Haitian-Creole translation which is a critical need in OCPS.
  - offer limited language and limited translation capabilities that do not match the language profile of OCPS.
  - focus primarily on notification and not family engagement.
  - take extended delivery time of SMS/MMS messages to all parents or guardians in the district.
- ➤ According to the spring 2023 OCPS communications survey, parents or guardians who responded **prefer receiving** classroom communication via text message over phone, email, or by planner.

### **Management's Conclusion:**

Management decided to establish a new, approved and effective twoway communication application, **TalkingPoints**, for **c**onsistent communication practices among the district, **non-charter schools**, families, and parents or guardians. Management selected TalkingPoints based on the information from:

- National Parent Teacher Association (PTA) Comparisons and Analysis
- Council of Great City Schools Evaluation
- 2022 Quasi-Experimental Study Interpretation and Outcomes
- 2020 Columbia University Study Research and Findings
- Best Practices on What Works Clearinghouse

Free communication apps are not approved by the district, do not have functionality to archive or retrieve past messages, and do not support all language translations needed to serve district families.

Based on reviews, evaluations, comparisons, and analysis, management has decided to establish TalkingPoints two-way communication application at district.

- Tool Comparison of Family-School Communication Technologies
- Common Sense Education The Best Family Communication Platforms
- Results and Outcomes of TalkingPoints Pilot Program at OCPS
- Positive Feedback and Surveys from OCPS Staff and Teachers
- Favorable results noted by OCPS Strategy Officer and School Choice Teams in student attendance, enrollment, and truancy

TalkingPoints was selected and acquired through the district's software approval process. TalkingPoints application is approved by the *Deputy Superintendent*, *Chief Schools Officer*, and *Senior Executive Director Professional Learning Department*.

**Additional Information About TalkingPoints:** 

TalkingPoints was started July 1, 2023 and within the first 8 weeks of implementation, 40% of users used TalkingPoints for at least one message while also using other free applications. Parents or guardians do not need to register for the TalkingPoints as they are automatically opted in.

If the TalkingPoints app is not downloaded by parents or guardians they will still receive messages in text as long as their phone number is registered with the OCPS. Per management, 99% of the phone numbers of users of TalkingPoints are valid. (*Refer to Appendix A - Screenshots of TalkingPoints as of 12/6/2023 for more information on analytics and numbers.*)

New student enrollments, withdrawals, and any changes in parents' or guardians' contact information in Skyward are synchronized nightly with TalkingPoints.

Unapproved platforms will no longer be accessible on the OCPS network after the 2023-2024 school year. The district will block webbased applications on the OCPS network and send a letter to each vendor requesting that employee and student information are removed.

TalkingPoints was selected and acquired through the district's software approval process.

Parents or guardians do not need to register for the TalkingPoints as they are automatically opted in.

Per management, 99% of the phone numbers of users of TalkingPoints are valid.

Unapproved platforms will no longer be accessible on the district's network after the 2023-2024 school year.

Management is aware of the risk that teachers and school staff may still use their personal phone and accounts with unapproved communication applications to contact parents or guardians. They acknowledge it will be a challenge for the district to stop these practices, but staff will be informed that TalkingPoints is the only approved method.

### **Data Security, Continuation of Operation, and Compliance:**

We reviewed contract, TalkingPoints' SOC 2 Type II Report and Report on Management's Descriptions and various policies, and conclude TalkingPoints has established appropriate:

- policies for the security of student data;
- plans for the continuation of operations; and,
- warranties for compliance with applicable laws.

The district has established a *Continuation of Operations Plan (COOP)* (managed by the *Safety and Emergency Management Division*). The *COOP* does not include a plan for communication applications. However, the district has established a *Florida Instructional Continuity Plan (ICP)* which has a paragraph of *Emergency and Ongoing Communications*. Currently, it is in draft process. If TalkingPoints were not available then staff would pivot to other two-way communication tools such as phone calls and emails.

### **Authorized Access of TalkingPoints and its Monitoring:**

As of 11/16/2023, 14,886 staff have access to this application. TalkingPoints *User Guidelines* explains different roles with the different access such as *District/ School Admins and Viewers*.

We ran a report from SAP - ZH330 - ZG - Termination and Resignation and selected 10 employees with the different organization units and jobs. We tested these 10 employees' access status in TalkingPoints according to their current employment status in the district through SAP - ZH03 - Employee Organization Unit. No exceptions were noted for unauthorized access of TalkingPoints.

Per management, TalkingPoints access is authorized through the OneRoster file which is used to define which staff (Administrative and

Talking Points has established policies and plans for student data security, continuation of operations, and compliance.

District has established a
Florida Instructional
Continuity Plan (ICP)
which includes Emergency
and Ongoing
Communications.

No exceptions were noted for unauthorized access of Talking Points.

Instructional) are rostered to which students and should have access to which LaunchPad applications, and to enable Single Sign On for those applications. For non-rostered staff (Classified), a ticket is entered at help.ocps.net and routed to staff to review the access request based on their need. If staffs are listed in SAP under a specific job title, then they can have access.

Management has plans to audit the access of all schools at the end of the current school year.

We noted inadequate control over deletion of messages from the *Admin Inbox* tab. We discovered that *District Viewers*, who are supposed to have view-only access, can delete school's *Admin Inbox* messages. (*Refer Appendix A - Screenshot 8 - School - Messages - Admin Inbox*). Management indicated messages deleted from the *Admin Inbox* tab are still under *All Messages* tab and are not totally deleted from the application. Messages are archived and stored in the application for future retrieval.

**No recommendation** as TalkingPoints' staff **resolved** this finding with our help, and removed the deletion feature for users with *District Viewer* access. We confirmed that the *Delete* feature for the *District Viewer* was no longer available under the *Admin Inbox* tab.

### Flagged Reports:

TalkingPoints and management together develop a flagged words dictionary. This dictionary is used by the application to extract flagged words from the *All Messages* tab and to store them under *Flagged Messages* tab. Application also provides *All Messages* and *Flagged Messages* reports for each school to download, review, evaluate, communicate, report, and resolve flagged messages.

We tested the *Flagged Messages* reports for three schools to confirm whether these reports are complete and accurate according to the flagged messages under the *All Messages* reports.

We noted the application's downloads are limited to a maximum 1000 messages under *All Messages* report. This is to avoid consuming long

We discovered that
District Viewers can
delete school's Admin
Inbox messages.
TalkingPoints' staff
resolved this inadequate
control with the help of
our testing.

Application provides flagged messages reports for further evaluation and resolution.

time to download all messages. Users can request management or TalkingPoints' staff for the full report of *All Messages*.

We requested TalkingPoints provide us one selected school's full *All Messages* report to verify flagged words in it. We randomly verified flagged words within the downloaded 1000 messages for the two other schools.

When we reviewed the sample schools' flagged words from the *All Messages* reports and compared with the downloaded *Flagged Messages* reports, we noticed these results:

- 1. Some flagged words from *All Messages* reports were not in the *Flagged Messages* report.
- 2. The same flagged word from *All Messages* reports for one month was not in the same school's *Flagged Messages* report for the other month.
- The same flagged word from All Messages reports was in one school's Flagged Messages report but not in the other schools' Flagged Messages report.
- 4. Sometimes the application did not extract any flagged words under the *Flagged Messages* tab. (*Noted that school staffs submitted heat tickets for this issue*).

We notified management and TalkingPoints' staff for further research. TalkingPoints staff reviewed, researched and **resolved** these issues. For #1, #2, and #3 results, TalkingPoints explained that due to periodic updates of the flagged words dictionary, *Flagged Messages* reports may not always be matched with the same or other school's *All Messages* reports. For #4 result, it occurred due to technical issues.

After resolution of #4, we verified and noted that, after the vendor's correction, the application is currently extracting flagged words.

There are no written procedures for reviewing, reporting, evaluating *Flagged Messages* report, and resolving concerns about flagged words. We verified the process documents for a sample of six schools. We requested these six schools' principals to provide documents or emails to support resolution of any flagged messages. Out of six schools, five

Application provides a report of maximum 1000 messages, but staff can request for the full report of messages.

Due to periodic updates of flagged words dictionary, Flagged Messages reports may not always match the same or other school's All Messages reports.

No written procedures were noted for reviewing, reporting, evaluating Flagged Messages report, and resolving of concerned flagged words.

schools had no concerned flagged words for further evaluation and resolution. The sixth school did not respond after three requests.

The district should establish written procedures for reviewing, reporting, evaluating the *Flagged Messages* report and for resolving on concerned flagged messages.

**Trainings:** 

- Management provides trainings on TalkingPoints features to all school administrators and staff.
- ➤ Management circulates memos on TalkingPoints to all principals.
- ➤ Get Help link is available on TalkingPoints for users to get immediate help or to read various articles on TalkingPoints features and functions. How to use this page link goes to the article and video.

Management has established *User Guidelines* explaining policies of usage, types of messages, and access of application. *User Guidelines* includes district's *Management Directives A-09*, *Employee Use of Technology and B-02*, *Use of Social Media*, and *Code of Ethics* which direct staff regarding the use of technology and social media.

We reviewed all district training materials forwarded to us by management and noticed that TalkingPoints *User Guidelines* is not covered in those training materials. *User Guidelines* is also not on Intranet. *User Guidelines – Access* explains clearly what to do and don't in the context of TalkingPoints with the reference of *Management Directives and Code of Ethics*.

Including *User Guidelines* in training materials will help users keep *Management Directives* and *Code of Ethics* in mind when using TalkingPoints.

### **Archived Messages and Records Management:**

TalkingPoints automatically archives messages from the previous school year. Recordings and transcripts can be requested from the TalkingPoints in the event of an investigation. There is a *Customer*  Out of selected six schools, five schools did not have any concerned flagged words for further evaluation and resolution. We did not receive any response from one school.

Application User
Guidelines has policies of
usage, types of messages,
access of application,
Management Directive
and Code of Ethics. User
Guidelines is not included
in training materials.

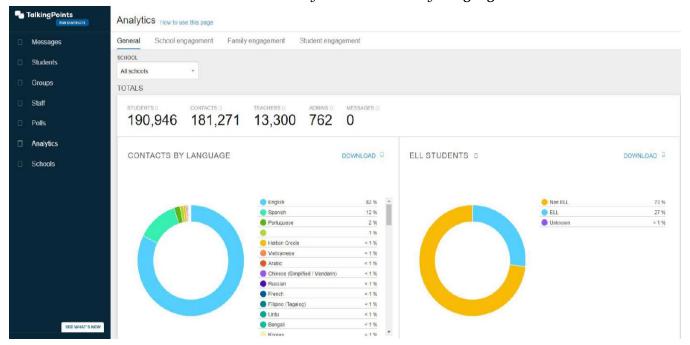
Support Manager (CSM) portal that relevant stakeholders use for transparent communication and project tracking.

Management discussed with the Senior Administrator, Document Management, and two persons from the Document Management Department will be given access to TalkingPoints for the purposes of responding to records requests.

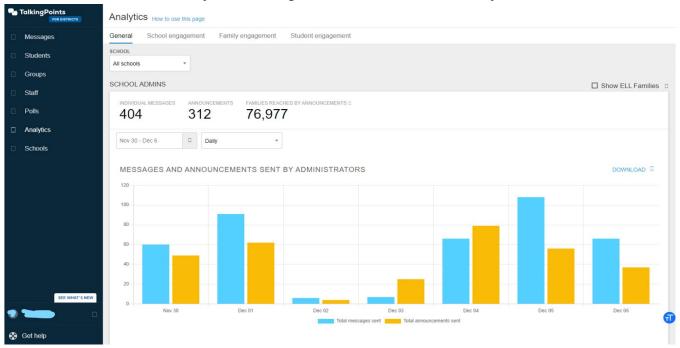
We wish to thank the *Family Engagement and Digital Learning Outreach* management and TalkingPoints' staff for their cooperation and assistance with this assessment.

### Appendix A - Screenshots of TalkingPoints as of 12/6/2023

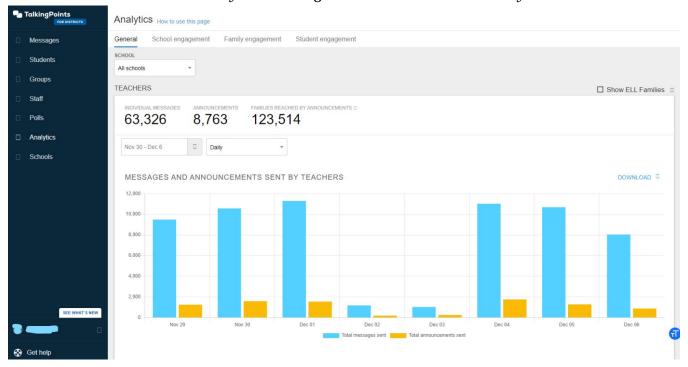
### Screenshot 1- Analytics - Contacts By Language



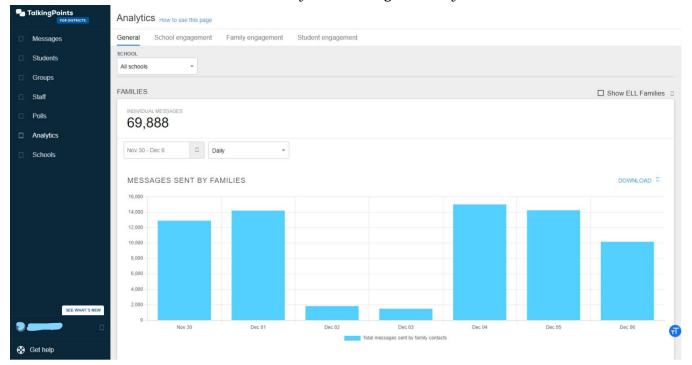
### Screenshot 2 - Analytics - Messages and Announcements Sent By Administrators



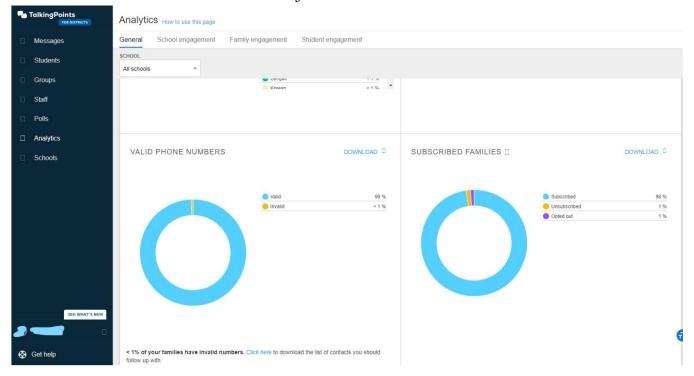
Screenshot 3 - Analytics - Messages and Announcements Sent By Teachers



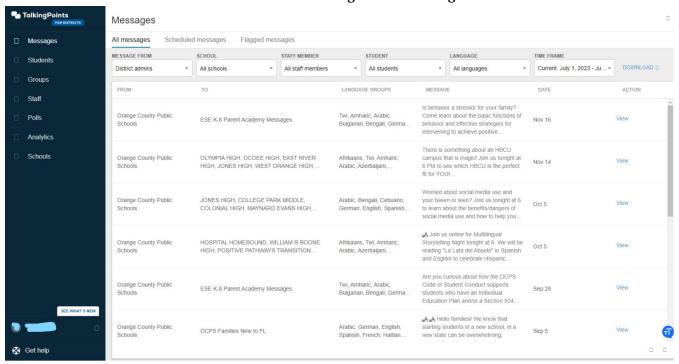
Screenshot 4 - Analytics - Messages Sent By Families



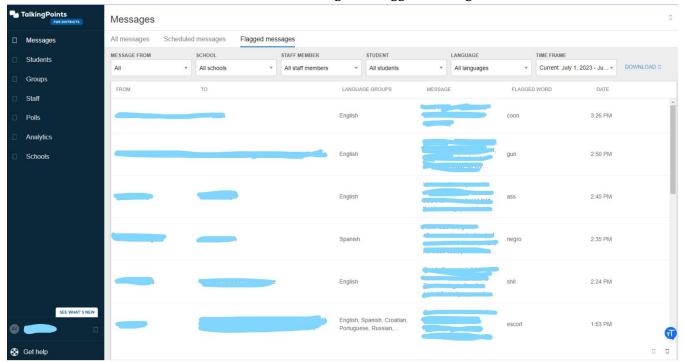
### Screenshot 5 - Analytics - Valid Phone Numbers (99%)



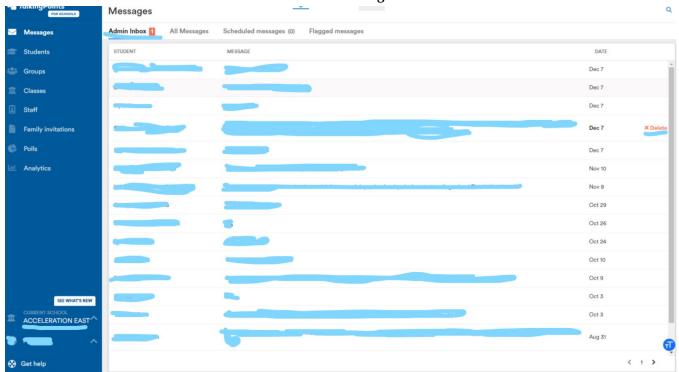
### Screenshot 6 - Messages - All Messages



Screenshot 7 - Messages – Flagged Messages



### Screenshot 8 - School-Messages-Admin Inbox



# OCPS 2023 TalkingPoints Pilot

A powerful partnership for parents and families!

TalkingPoints is a non-profit organization solely focused on family engagement for under-resourced and multilingual communities. OCPS used Title IV funding to pilot their twoway family engagement platform which allows staff to safely send SMS communication from April 23, 2023 to May 31, 2023.

### **PILOT PARTICIPANTS**



**Title I Schools** 





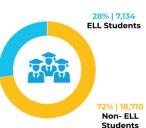




**LANGUAGE & ELL PILOT STATS** 







Students

Twenty percent of families in the pilot sample preferred to receive and respond to communication in Spanish only.

Twenty-eight percent of students in the pilot were English Language Learners and active participants in the ESOL program.

### **PILOT CONTACT STATS**



**Parent Contacts** 





Unsubscribed



**Valid Contacts** 



Prefer SMS to App

### **PILOT COMMUNICATION STATS**



93,087 **Total Messages &** Announcements



**Admin** Individual Messages



**Teacher Individual** Messages

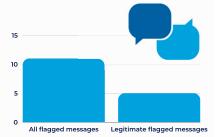


**Messages Sent By Families** 

### **PILOT MESSAGE STATS**



During the 1st week of implementation 35% of respondents were parents or guardians of **ELL students** 



During the pilot period there were only five legitimate flagged message responses out of 95,092 total announcements and messages. All five flagged messages were sent by parents at high schools.

## 23-24 TalkingPoints Expansion

A powerful partnership for parents and families!

OCPS seeks to expand the use of TalkingPoints to all non-charter schools beginning in July 2023 through Title IV funds. TalkingPoints will be used by staff for two-way communication with parents and guardians about students.

### **USERS**











Administrators Teachers

Social Workers **Engagement Liaisons** 

School Counselors

**School Clinic** 

### **GOALS & OBJECTIVES**

Improve communication between staff and families

· Increase the platform adoption to 40% of eligible users from baseline.

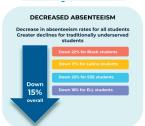
### Improve student performance

- Decrease the number of low performing students by 5% overall.
- · Decrease the number of missing assignments from students.

### Improve student attendance

• Decrease student absences by 10%

# IMPROVED ACADEMIC OUTCOMES vement in course proficiency levels r gains for traditionally underserved



overall.

### **SAFETY & SECURITY**

- · Signed Data Sharing Agreement in place
- FERPA, CIPPA, and COPPA Compliant
- · Teacher mobile number not shared
- Teacher mobile phone use not required
- · All messages archived
- · Teacher, School Admin and District admin can access message archive, if needed
- Messages with specific keywords or profanity flagged

### **COMMUNICATION SURVEY RESULTS**

Text message is the most preferred communication mode for communication from classroom teacher by parents



If face-to face communication with teacher is not an option, parents preferred text messages ... over written communication in a journal or notebook

The lowest average satisfaction rating was "communications from 🏚 🔀 🛣 your child's teacher(s)" with an average satisfaction rating of 7.38.



### SCHOOLMESSENGER®

Share the most important information with families to keep them informed

1 way communication

Opt-in

Text, email, phone calls

Available translation if indicated in

Skyward

District and school level

messaging

Automated calls (ie. attendance)

District crisis communication

### **TalkingPoints**

Daily relationship building with families to support improved student outcomes

2 way communication

Opt-out

Text by default (opt into app)

Translated into 145 languages Video Translation

Human Translation available at no additional cost

K12 terminology support Zero entry communication

For class level messaging, daily and weekly communication

Note: Because TalkingPoints is opt-in and zero entry for families, it is an effective tool to

