

# Testimony for Vermont H.650 Bill: Education Technology

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INTERNET  
SAFETY  
//LABS

Example ISL App safety label for Audible Android app found in South Burlington High School.

<https://appmicroscope.org/app/249/>

# App Safety Label

View older labels



**Audible: audiobooks & podcasts - Android**  
Books > Audiobooks  
Owner: Amazon  
Last Tested: July 21, 2022  
Schools Using (2022): 8 Elem, 12 Middle, 11 High  
Privacy Policy Covers Children Under 13: No

Score Triggers: 1  


## App Safety Facts – Summary

**PRIVACY RISKS** 11 3rd Parties 13 Permissions  Webview

| Observed Network Traffic <span>1</span> | This App                                                                                        | App Category Average<br>n=11 <span>1</span> |
|-----------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------|
| Aggregator Platforms                    | 4                                                                                               | 2.5                                         |
| Total # of Companies                    | 6                                                                                               | 7.4                                         |
| Data Broker Companies                   | 0                                                                                               | 0.0                                         |
| Total # of Subdomains                   | 15                                                                                              | 23.3                                        |
| Risky Subdomains                        | 7                                                                                               | 11.3                                        |
| Data Broker Subdomains                  | 0                                                                                               | 0.0                                         |
| <b>Total # of SDKs <span>1</span></b>   | 27                                                                                              | 9.7                                         |
| Risky SDKs                              | 11                                                                                              | 3.6                                         |
| Data Broker SDKs                        | 0                                                                                               | 0.0                                         |
| <b>Risky Behaviors <span>1</span></b>   | <b>This App</b>                                                                                 | <b>App Category % <span>1</span></b>        |
| Ads                                     | No           | 27.3%                                       |
| Behavioral Ads                          | No           | 0.0%                                        |
| Webview                                 | Yes          | 36.4%                                       |
| <b>User Data <span>1</span></b>         |                                                                                                 |                                             |
| Sensitive Permissions                   | Physical Environment, Files, Join User Identifiers, Location, User Behavior, Social Information |                                             |

## App Safety Facts – Privacy Risk Details

### 3RD PARTY SHARING DETAILS

#### Observed Network Traffic 1

| Aggregator Platforms Receiving Data:                                                |          |                 |                                                                                      |                     |
|-------------------------------------------------------------------------------------|----------|-----------------|--------------------------------------------------------------------------------------|---------------------|
| Amazon<br>Google<br>Adobe<br>Meta                                                   |          |                 |                                                                                      |                     |
| Risk                                                                                | Company  | # of Subdomains | Categories                                                                           | App Outbound Call % |
|  | Kochava  | 2               | Advertising / Marketing (2)<br>Analytics, Tag Management,<br>Advertising / Marketing | 13.3%               |
|                                                                                     | Adobe    | 2               |                                                                                      | 13.3%               |
|  | Google   | 1               | Developer Tools<br>Omnichannel Outreach<br>Data Management Platform                  | 6.7%                |
|                                                                                     | Amazon   | 1               |                                                                                      | 6.7%                |
|                                                                                     | Adobe    | 1               |                                                                                      | 6.7%                |
|  | Amazon   | 6               | E-Commerce (3), CDN, Content<br>Delivery Network, Authentication<br>Cloud Services   | 40.0%               |
|                                                                                     | Firebase | 1               |                                                                                      | 6.7%                |
|  | None     |                 |                                                                                      |                     |
|  | Audible  | 1               |                                                                                      | 6.7%                |

#### Included SDKs 1

| Risk                                                                                  | Company             | # of SDKs | Categories                                                                                                                                        | App Category % |
|---------------------------------------------------------------------------------------|---------------------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|   | Kochava             | 1         | Advertising > Ad Measurement, Advertising > Ad Security, Advertising > Audience Data, Advertising > Deep Linking                                  | 18.2%          |
|                                                                                       | Google              | 1         | Advertising                                                                                                                                       | 18.2%          |
|  | Adobe               | 2         | Advertising > Customer Data Platform, Marketing > Analytics (2)                                                                                   | 9.1%           |
|                                                                                       | Amazon              | 2         | Marketing > Omnichannel Outreach, Marketing > Analytics                                                                                           | 9.1%           |
|                                                                                       | Google              | 5         | Developer Tools > GIS, Marketing > Analytics (3), Identity & Access Management > Authentication, Identity & Access Management > Federated Sign-in | 9.1%           |
|                                                                                       |                     |           |                                                                                                                                                   |                |
|  | SmartBear           | 1         | Developer Tools > Debugging & Bug Tracking                                                                                                        | 9.1%           |
|                                                                                       | Apollo Graph Square | 1         | Developer Tools > GraphQL                                                                                                                         | 9.1%           |
|                                                                                       |                     | 2         | Developer Tools > Development Framework, Photo & Video > Creation & Editing                                                                       | 9.1%           |
|                                                                                       | Jet Brains          | 1         | Developer Tools > Development Framework                                                                                                           | 18.2%          |
|                                                                                       | ReactiveX           | 1         | Developer Tools > Development Framework                                                                                                           | 9.1%           |
|                                                                                       | Adobe               | 1         | Marketing > A/B Testing & Optimization                                                                                                            | 9.1%           |
|                                                                                       | Amazon              | 2         | Developer Tools > Development Framework, Developer Tools > Performance                                                                            | 9.1%           |
|                                                                                       |                     |           |                                                                                                                                                   |                |
|                                                                                       | Google              | 2         | Marketing > Analytics, Developer Tools > Chat / Messaging / Push Notifications, Developer Tools > Cloud Services                                  | 36.4%          |
|                                                                                       |                     |           |                                                                                                                                                   |                |
|  | Square              | 4         | Developer Tools > Development Framework, Developer Tools > Networking (2), Developer Tools > Shake Detection                                      | 9.1%           |
|                                                                                       | Meta                | 1         | Graphics & Design > Animation & Effects                                                                                                           | 9.1%           |

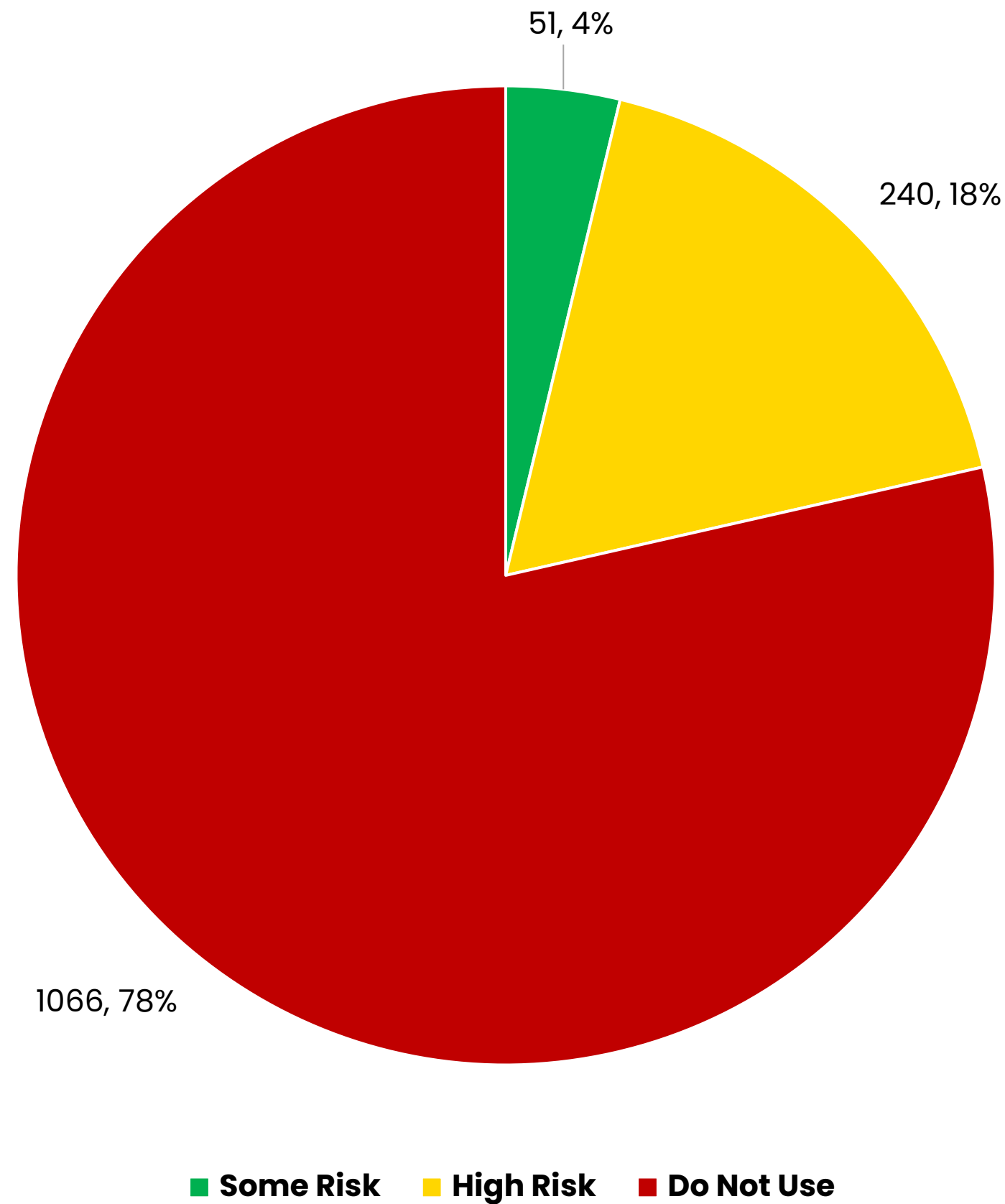
# 2022 K-12 EdTech Safety/Privacy Benchmark



# Data Collection – By the Numbers

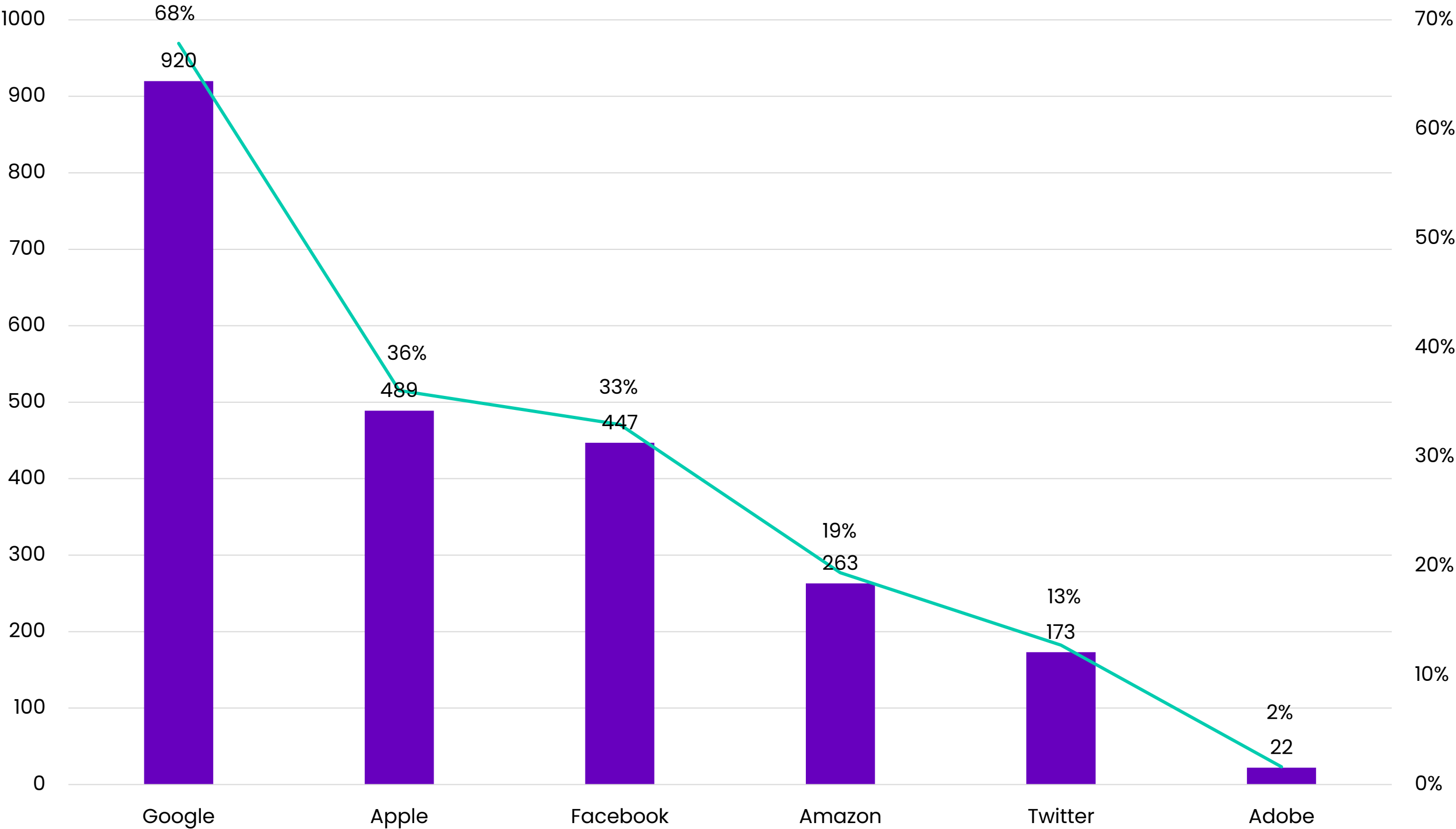
- ◆ 663 schools
  - ◆ 50 states + DC
  - ◆ Covering 455,882 students
  - ◆ 29,000+ data points
- ◆ 1722 apps identified
  - ◆ 88,000+ data points
- ◆ 1357 apps scored
  - ◆ Plus network traffic collection

# App Scores (1357 apps)



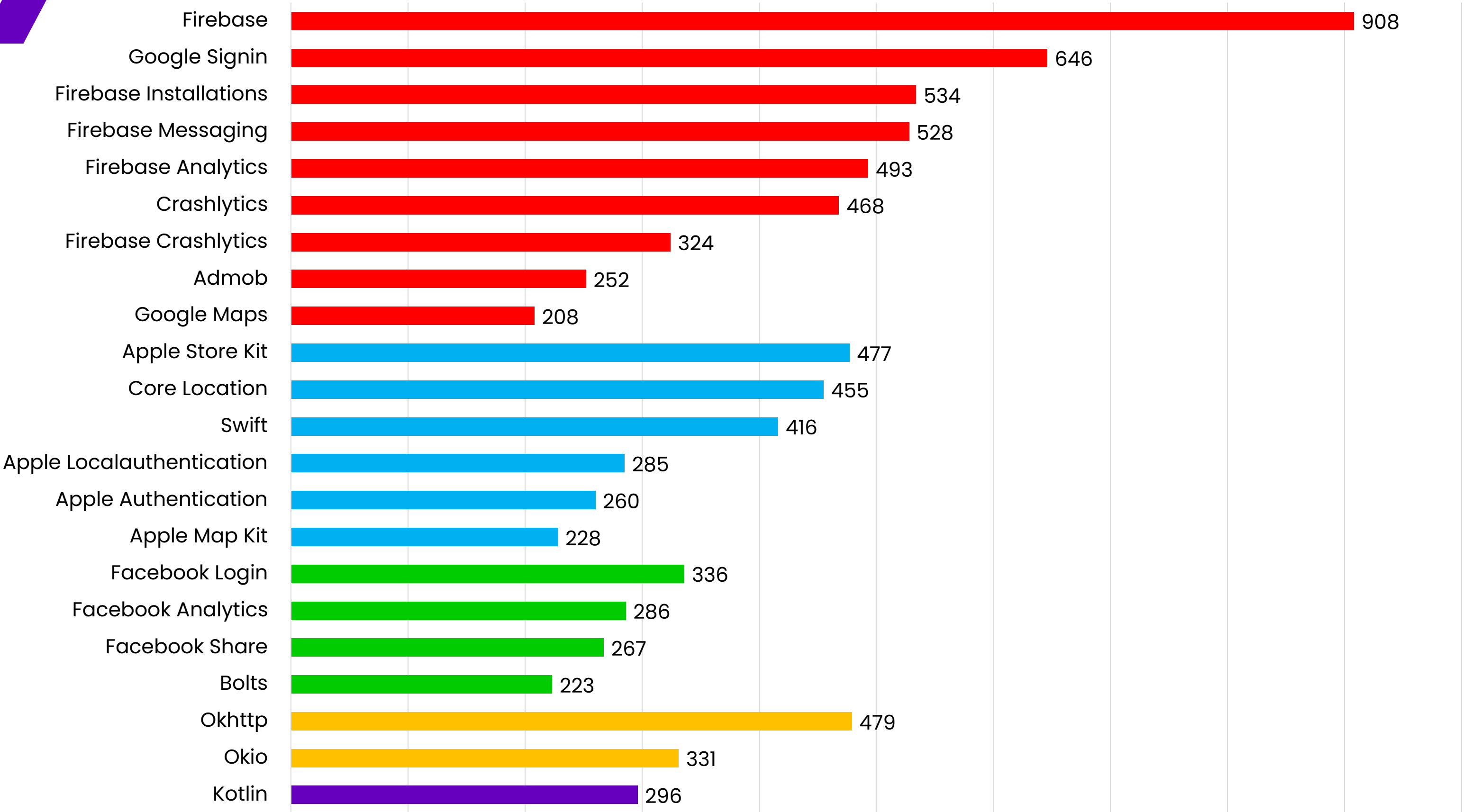


# Observed Network Traffic to Big 6 Platforms - All Apps





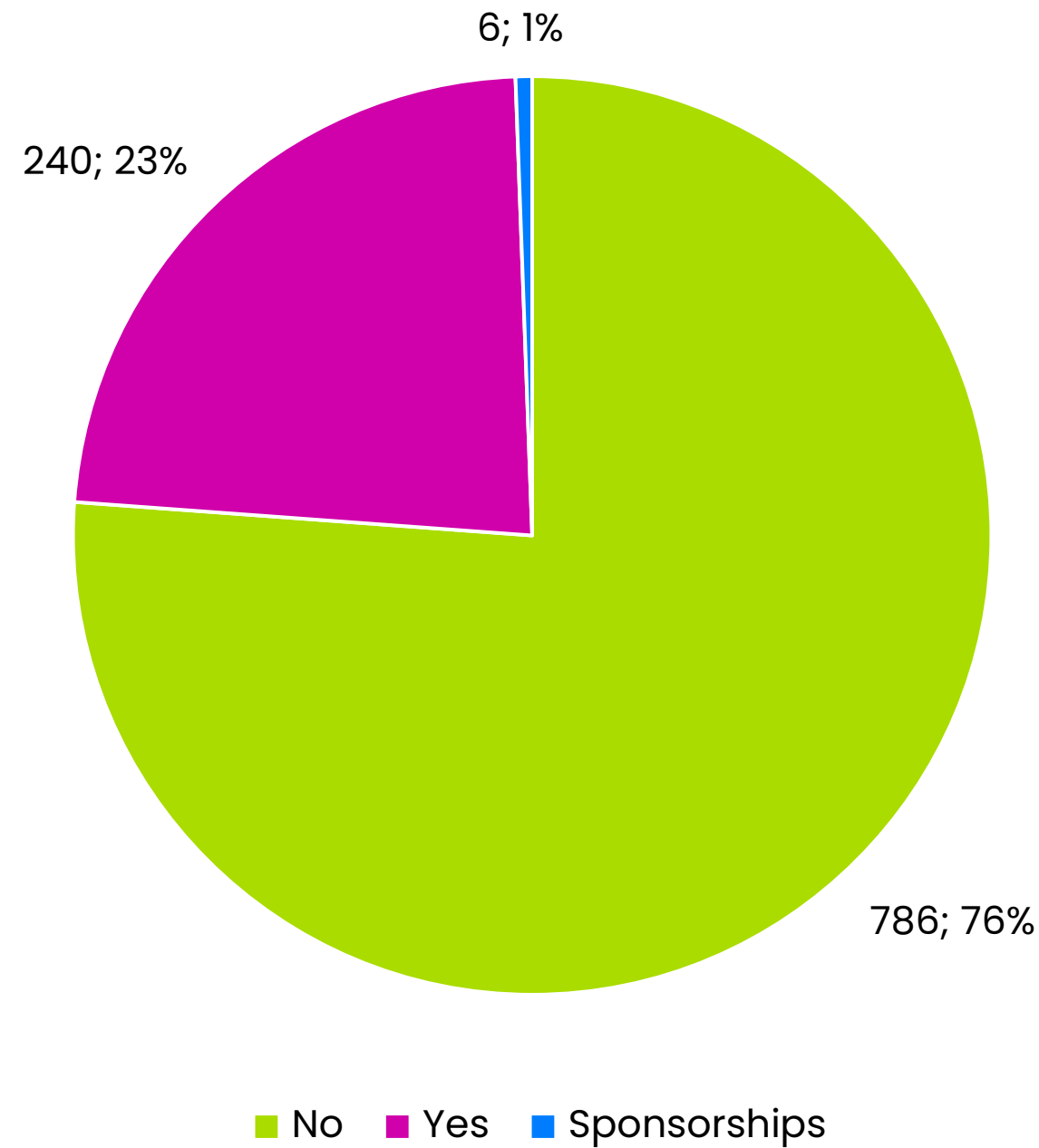
# Most Used SDKs (Clustered by Developer)



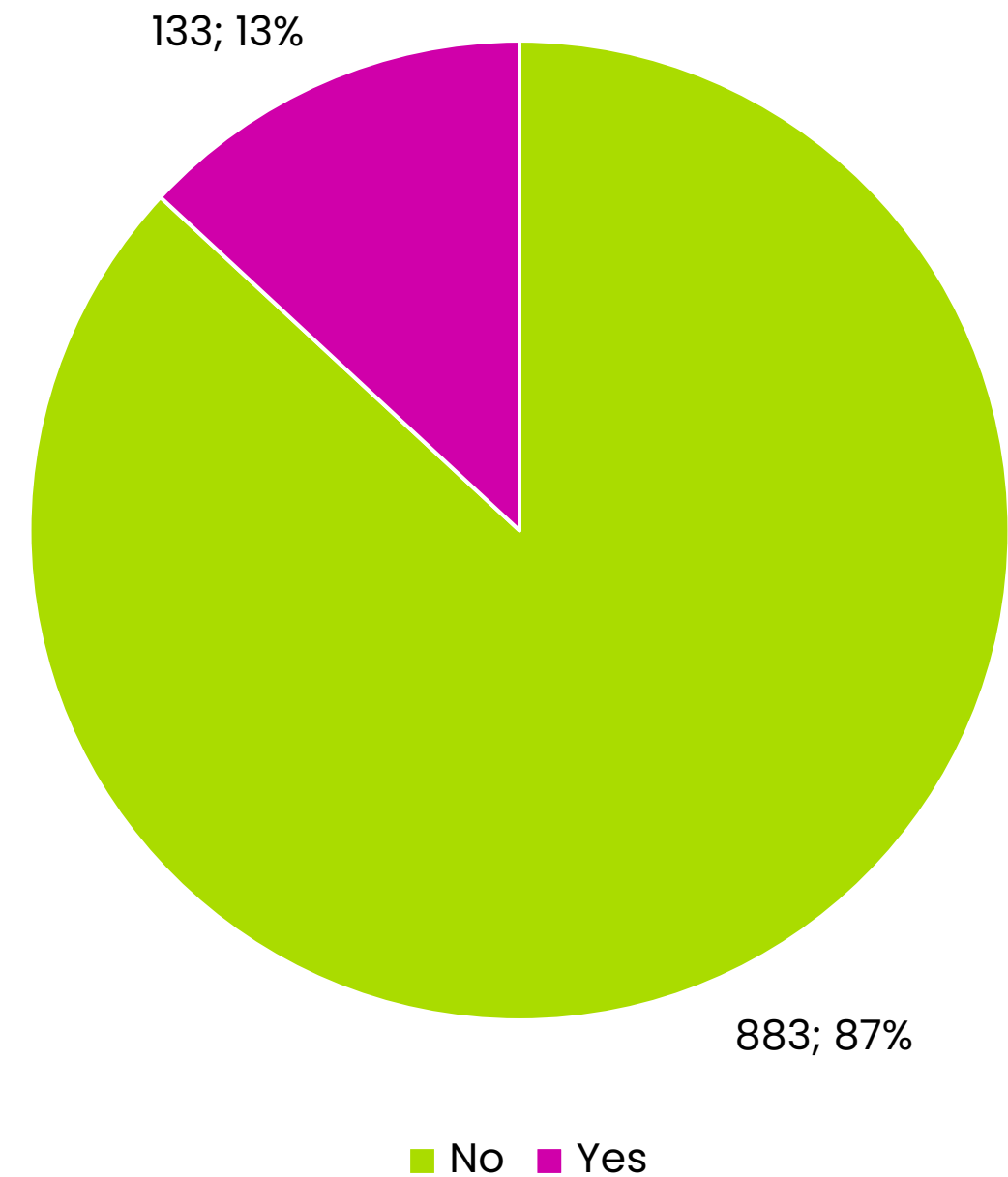


# Advertising in K12 Edtech

**Ad Presence – All Apps**



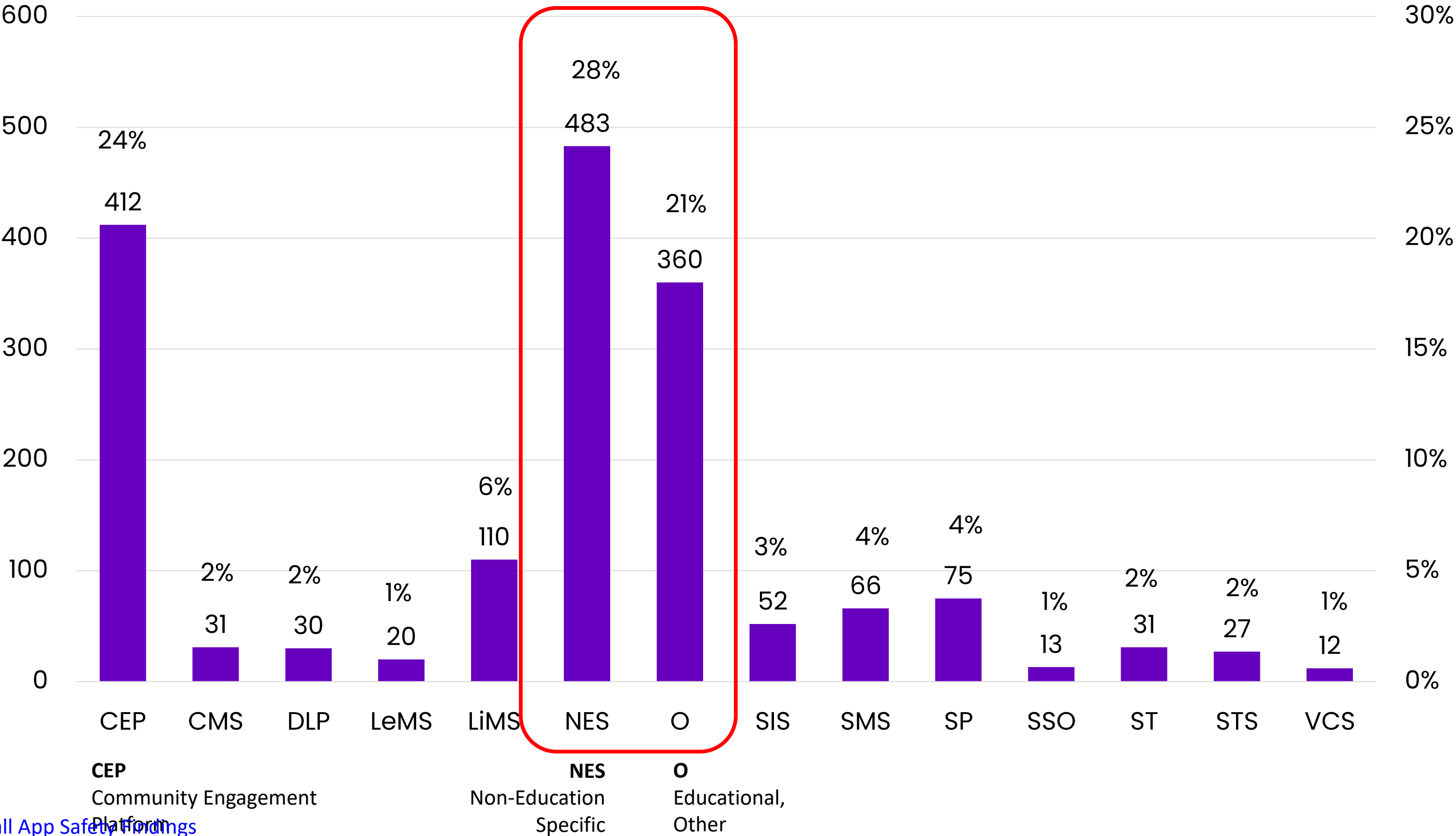
**Retargeting Ad Presence – All Apps**





| ALL NON-CEP APPS                     | # Apps | Do Not Use | High Risk | Some Risk | Unable to Test | Ads   | Retargeting Ads |
|--------------------------------------|--------|------------|-----------|-----------|----------------|-------|-----------------|
| ISL Benchmark                        | 1298   | 54.6%      | 15.1%     | 3.9%      | 26.5%          | 15.2% | 8.9%            |
| Any Certification or Promise         | 431    | 51.5%      | 15.6%     | 3.0%      | 29.9%          | 7.9%  | 2.0%            |
| No Certifications or Promises        | 867    | 56.1%      | 14.9%     | 4.3%      | 24.8%          | 18.6% | 12.1%           |
| CERTIFICATIONS                       |        |            |           |           |                |       |                 |
| All Certifications                   | 93     | 63.4%      | 9.7%      | 0.0%      | 26.9%          | 16.2% | 0.0%            |
| ALL COPPA Safe Harbor Certifications | 61     | 73.8%      | 9.8%      | 0.0%      | 16.4%          | 21.6% | 0.0%            |
| iKeepSafe                            | 24     | 79.2%      | 0.0%      | 0.0%      | 20.8%          | 10.5% | 0.0%            |
| KidSafe                              | 25     | 72.0%      | 16.0%     | 0.0%      | 12.0%          | 18.2% | 0.0%            |
| Privo                                | 10     | 60.0%      | 20.0%     | 0.0%      | 20.0%          | 50.0% | 0.0%            |
| Proprietary                          |        |            |           |           |                |       |                 |
| 1EdTech                              | 40     | 40.0%      | 12.5%     | 0.0%      | 47.5%          | 0.0%  | 0.0%            |

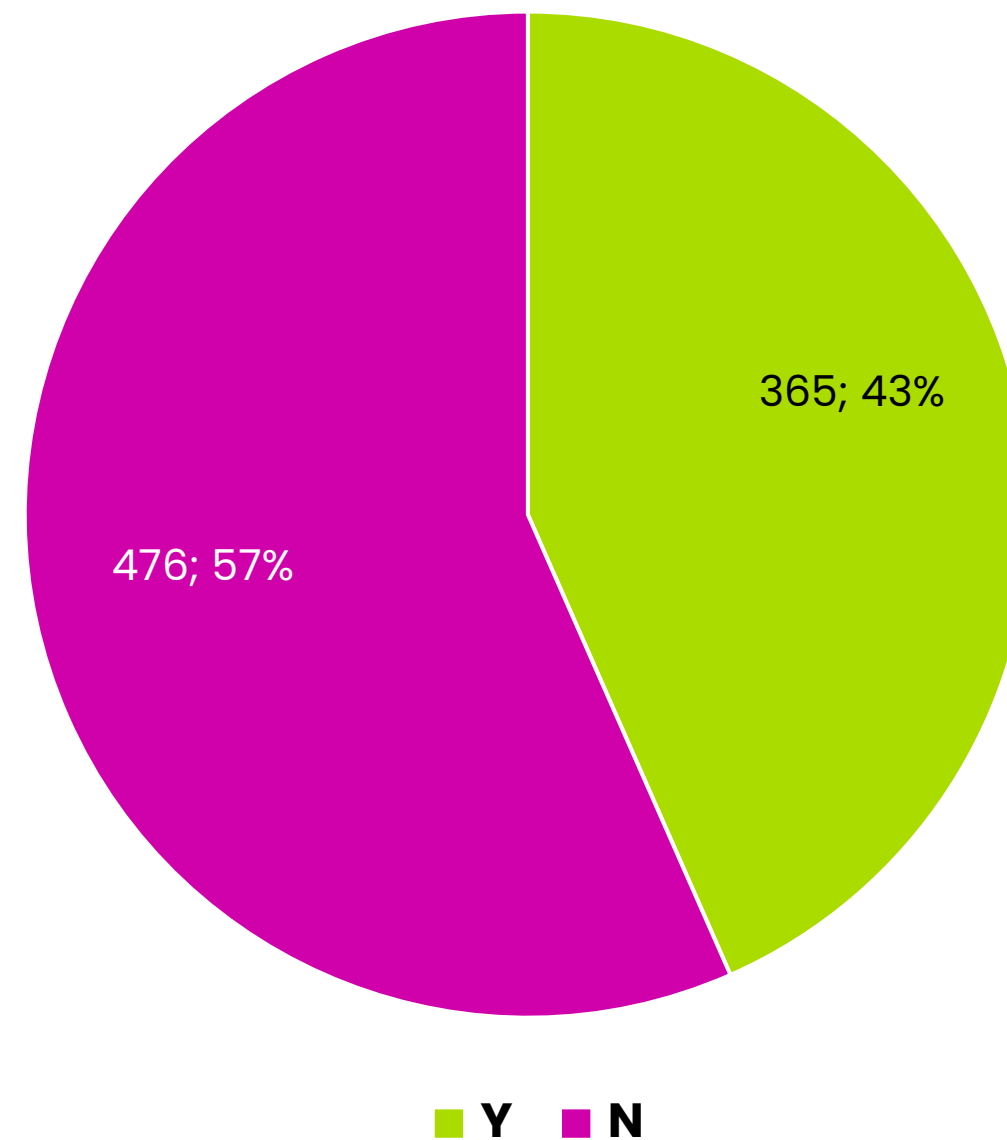
# All Apps by App Category





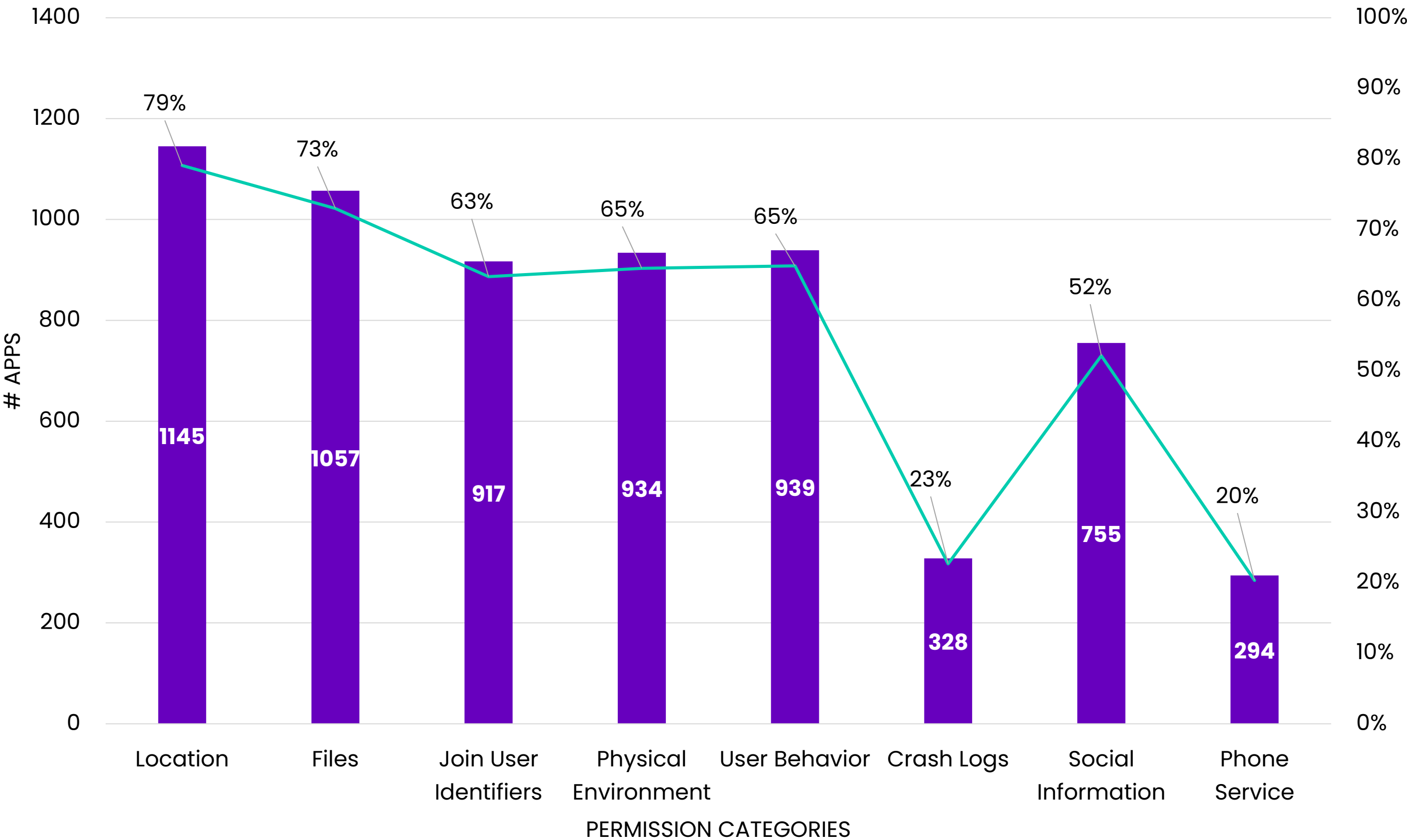
# 476 (28%) of All Apps Were NOT for Children

NES and O Combined for Children





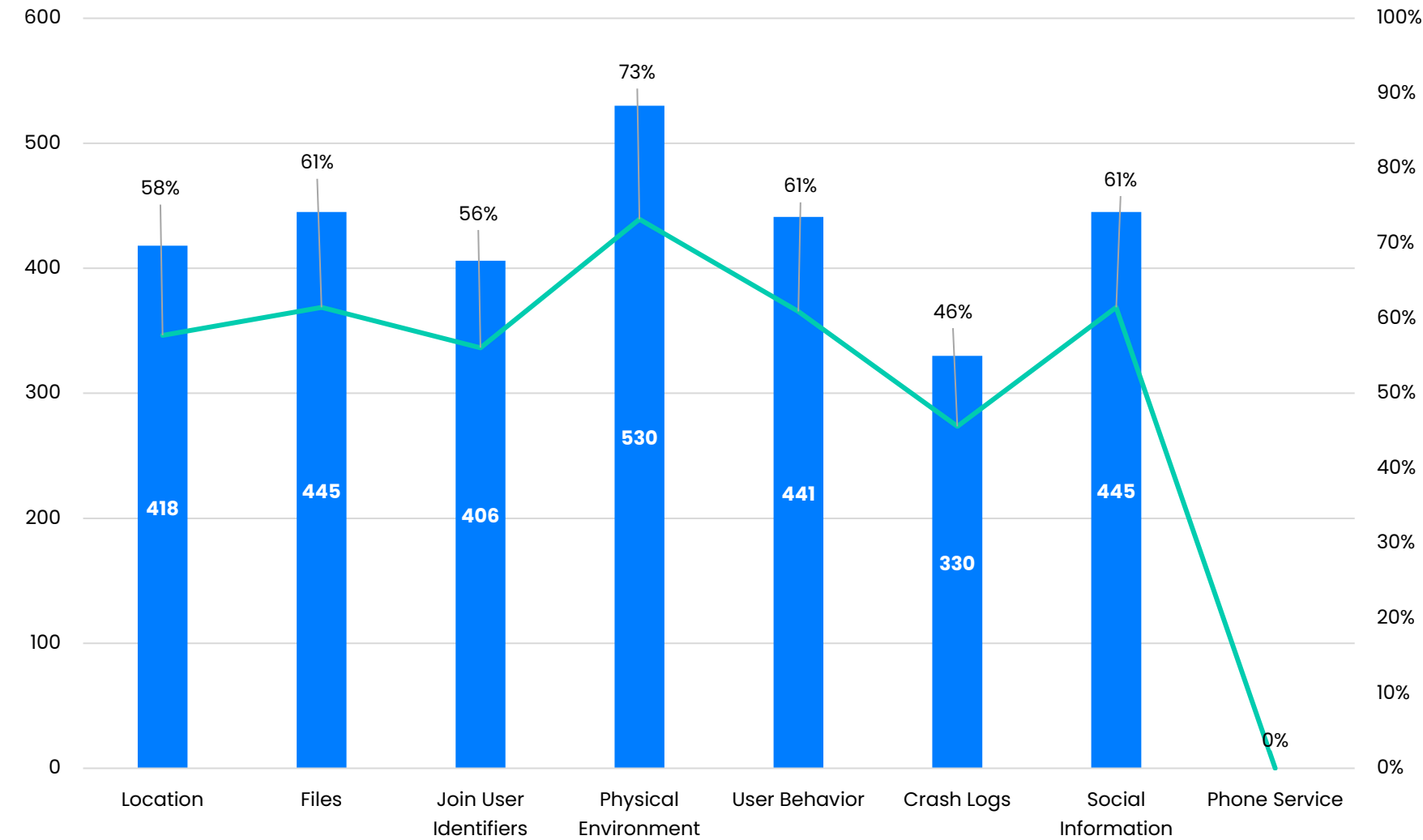
# Permissions - All Apps



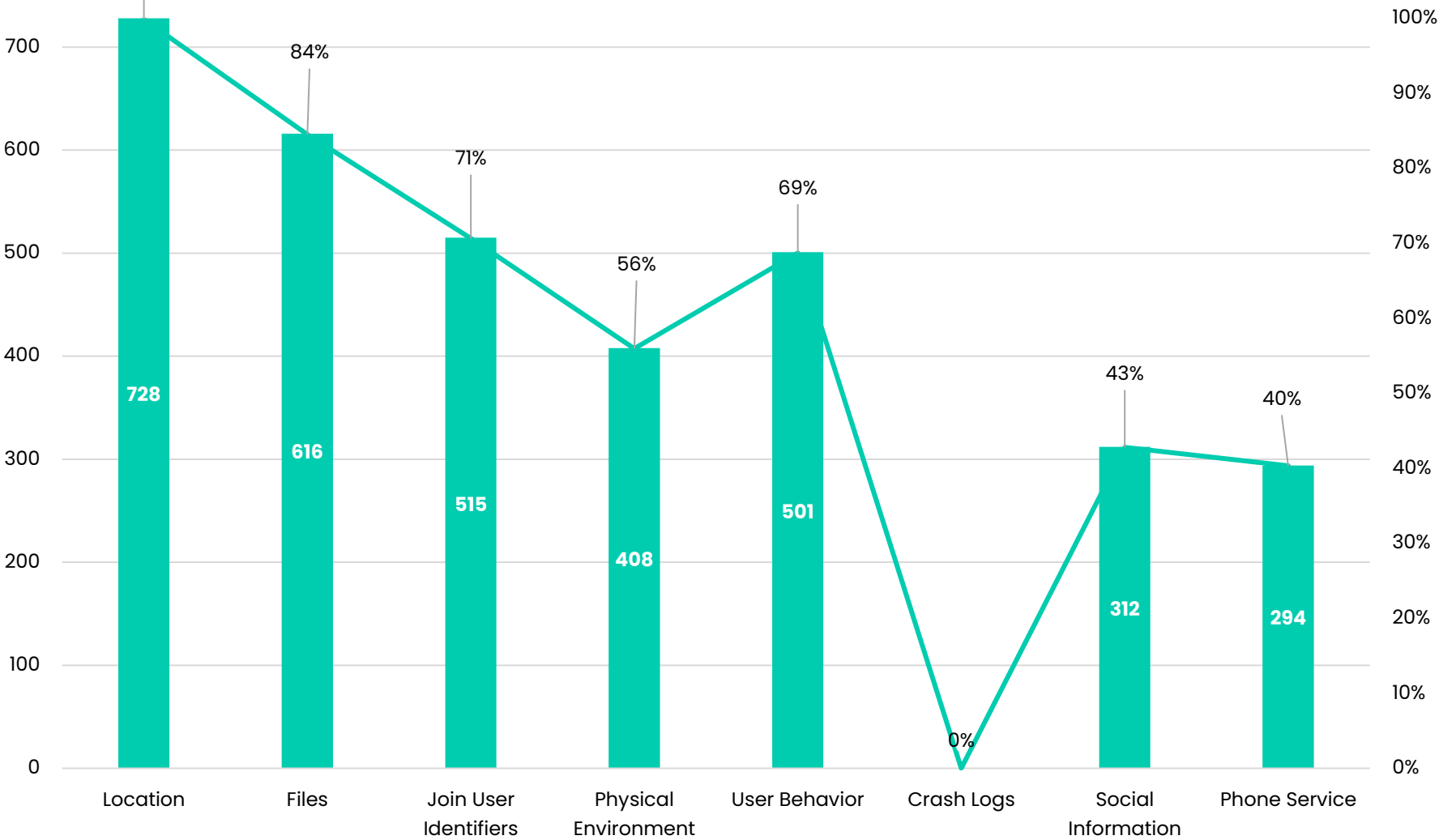


# Permissions by OS

Permissions – iOS Apps



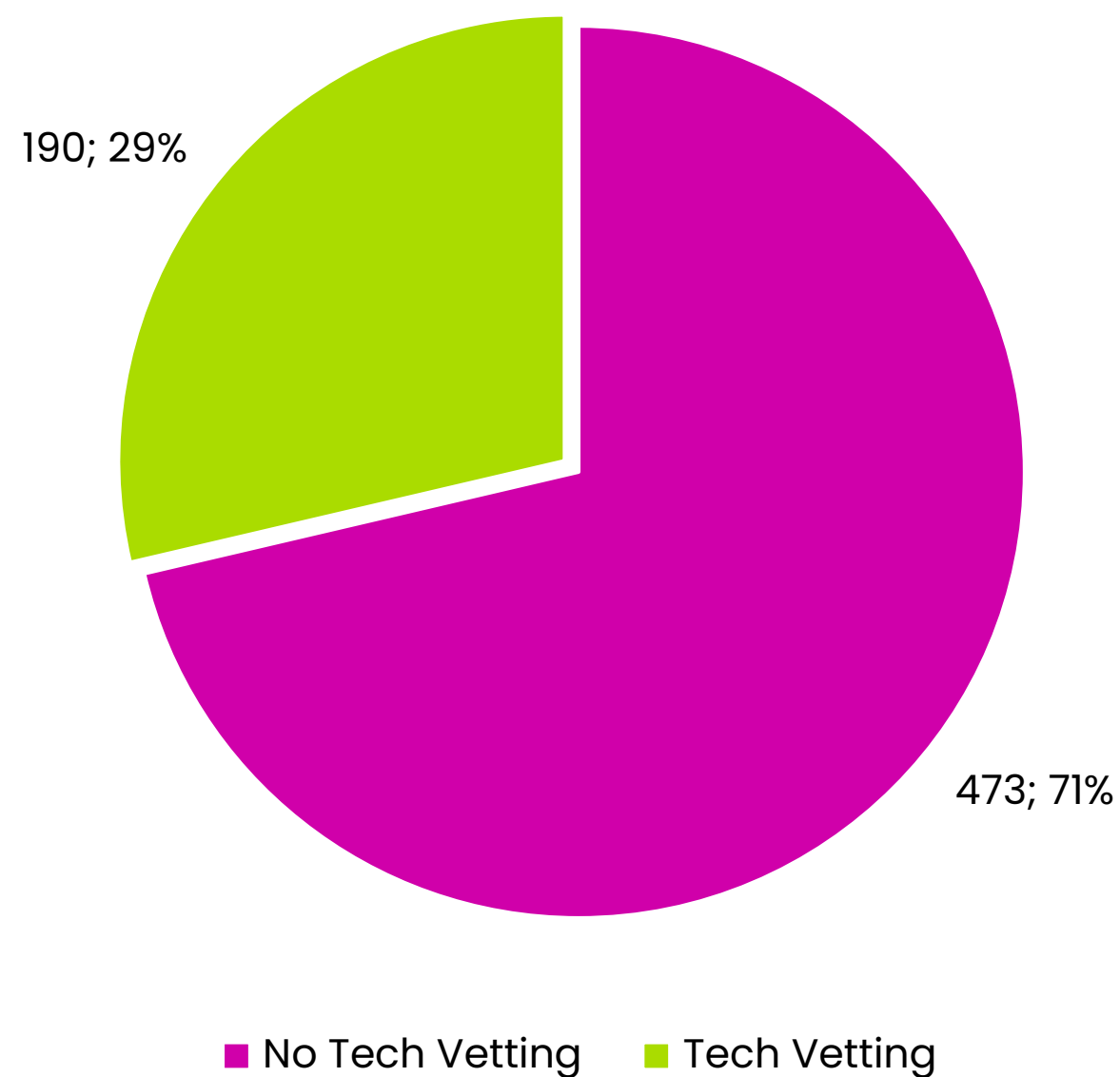
Permissions – Android Apps





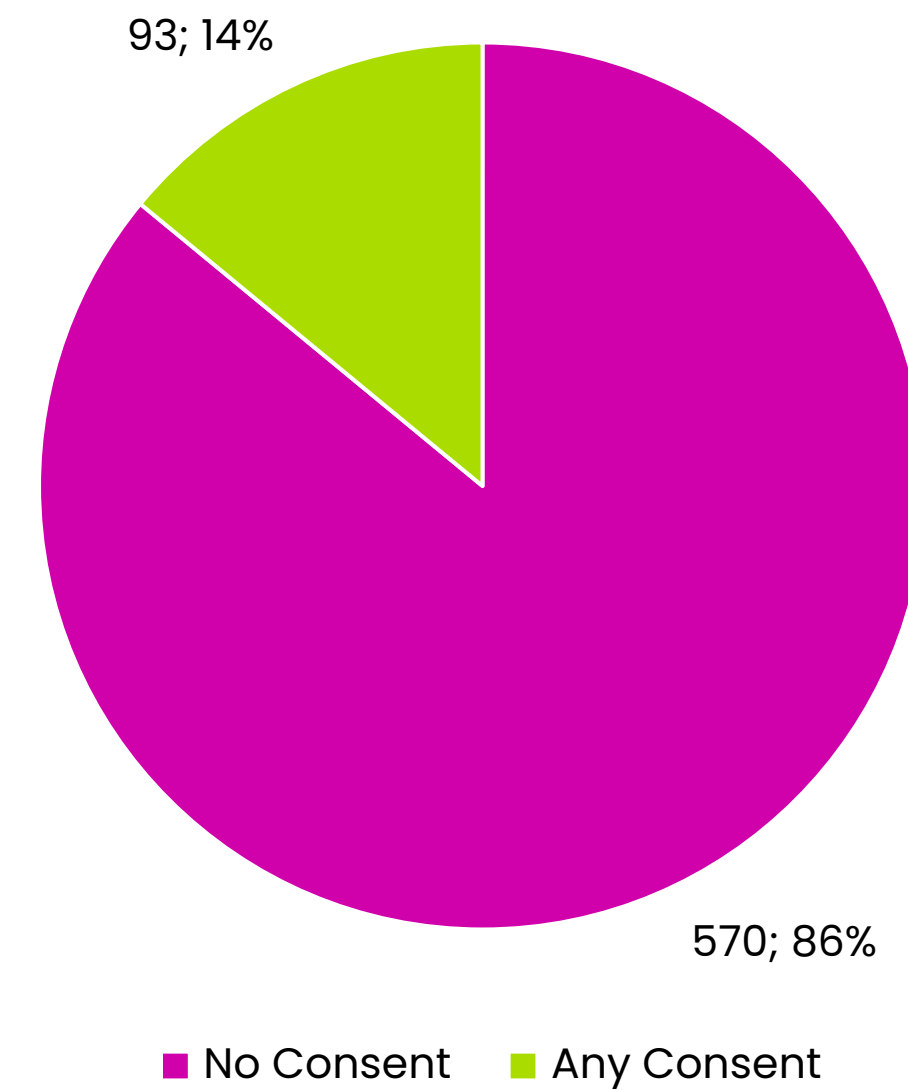
# Vetting

Technology Vetting by Schools



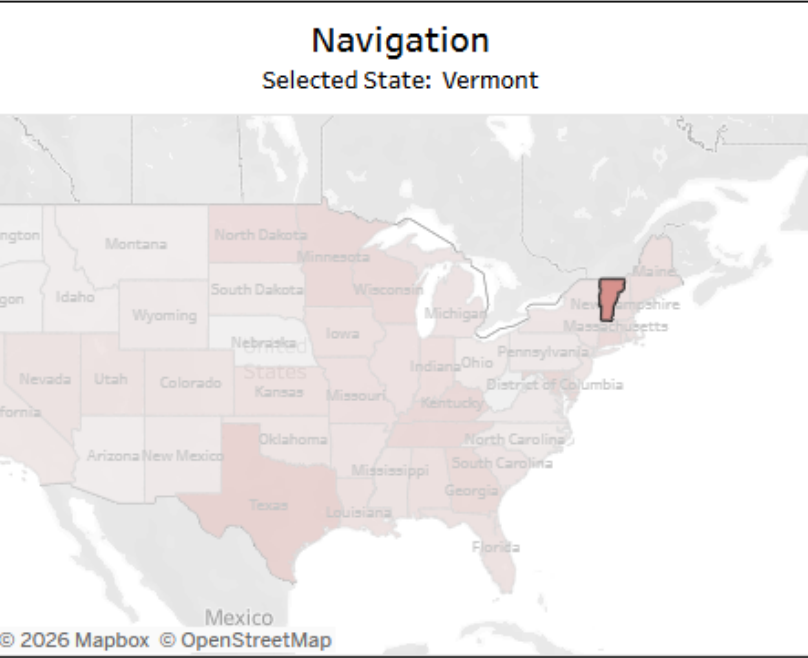
# Consent

Tech Consent Practices in US Schools

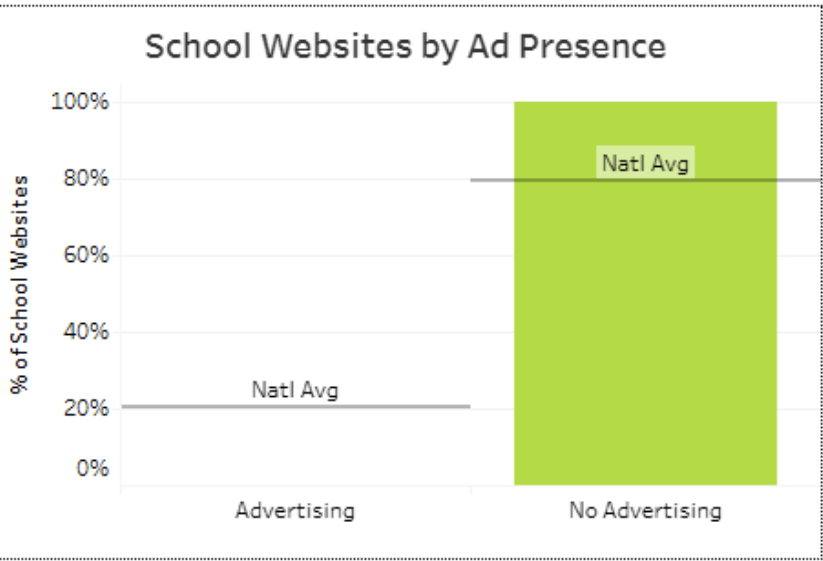
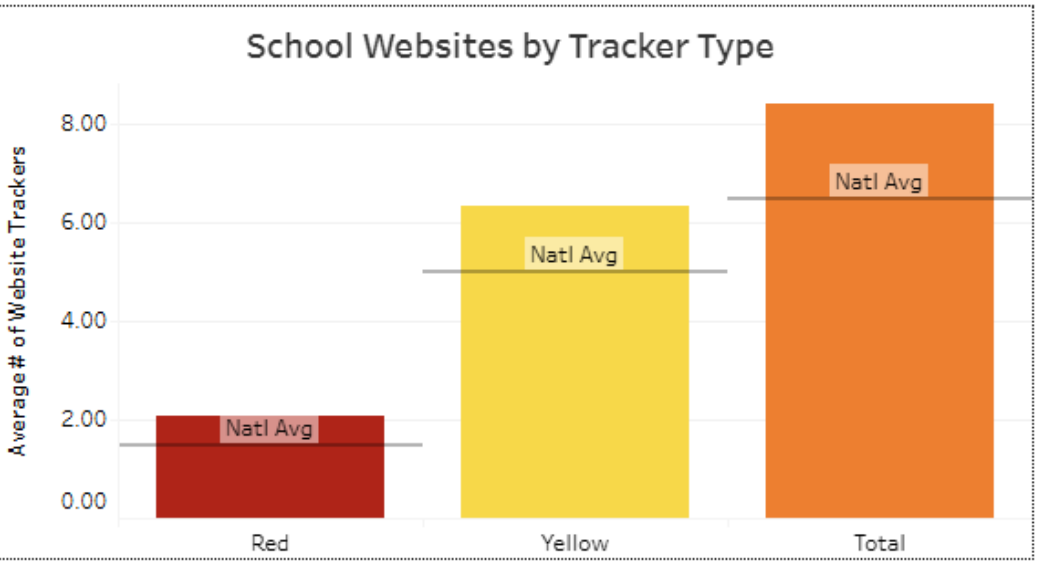
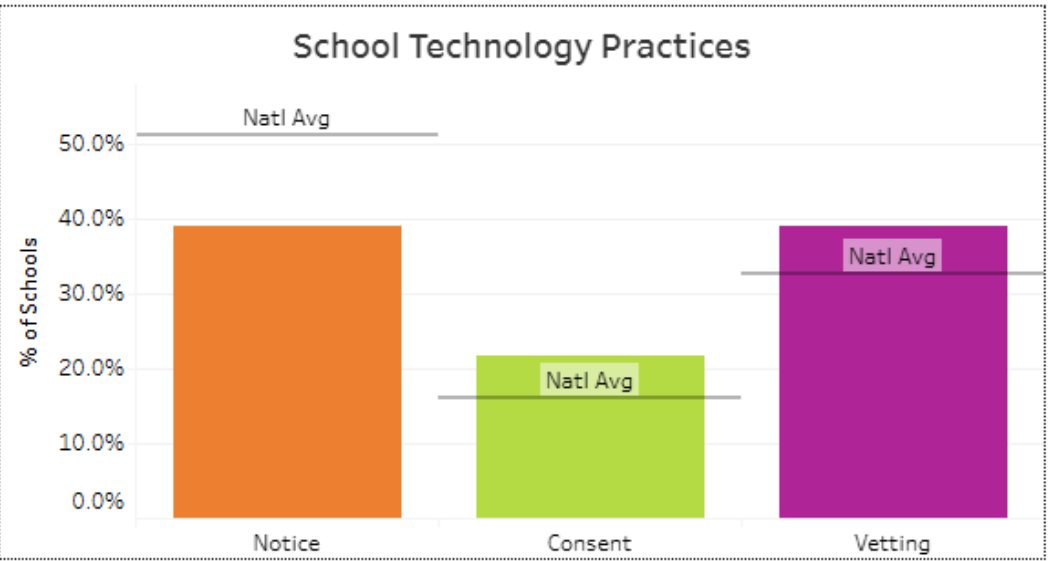
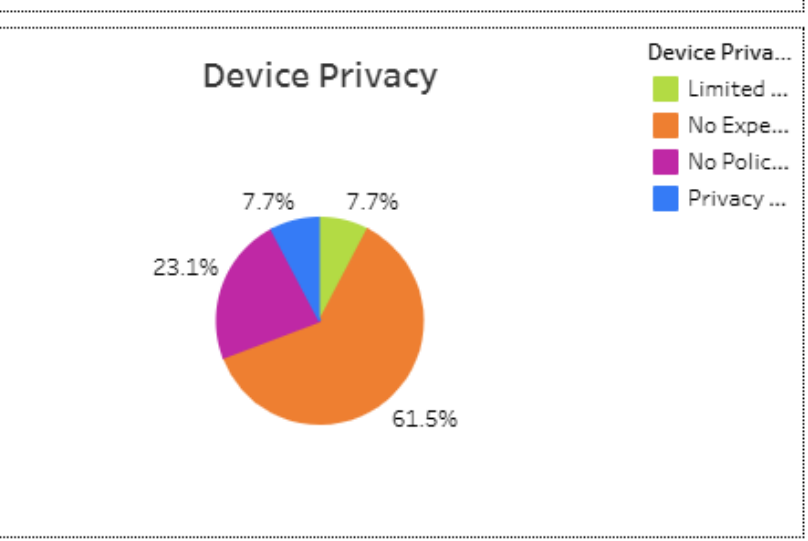
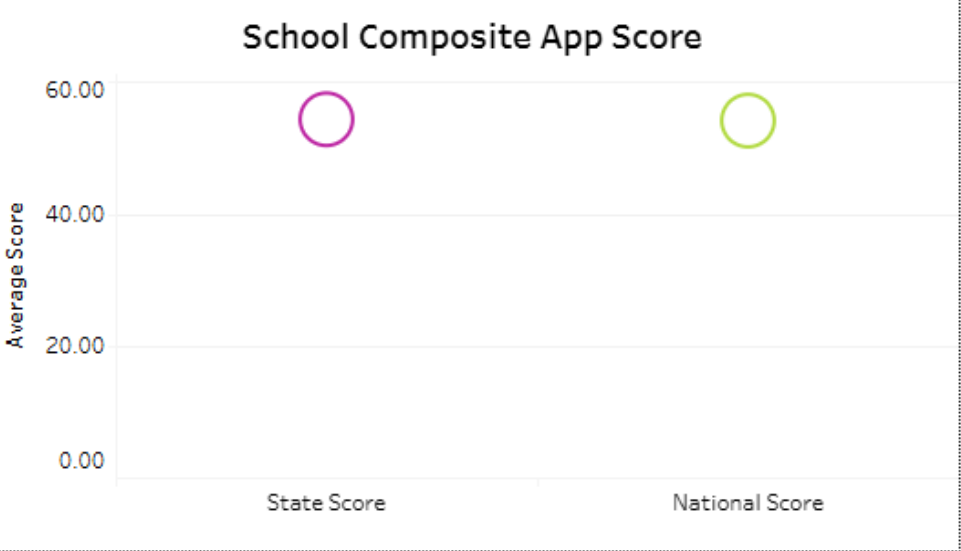
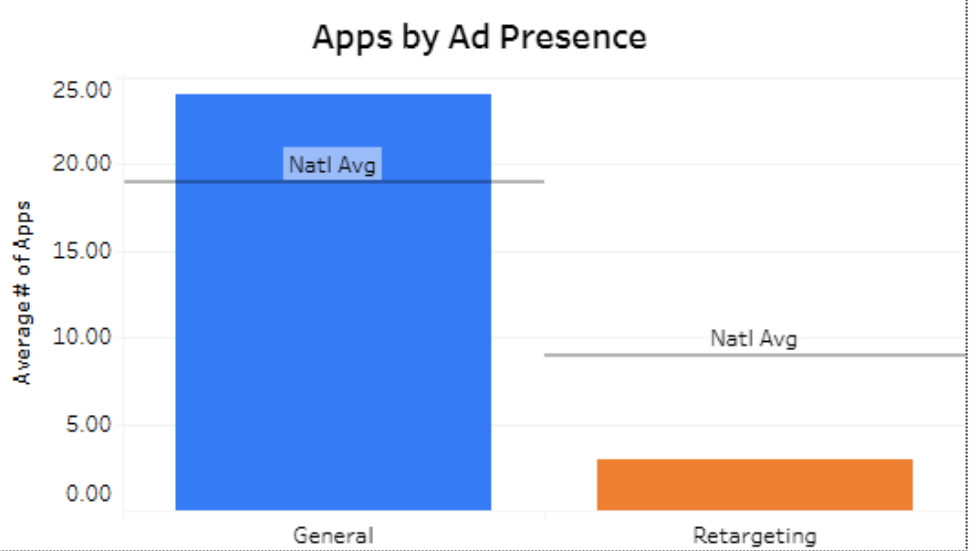
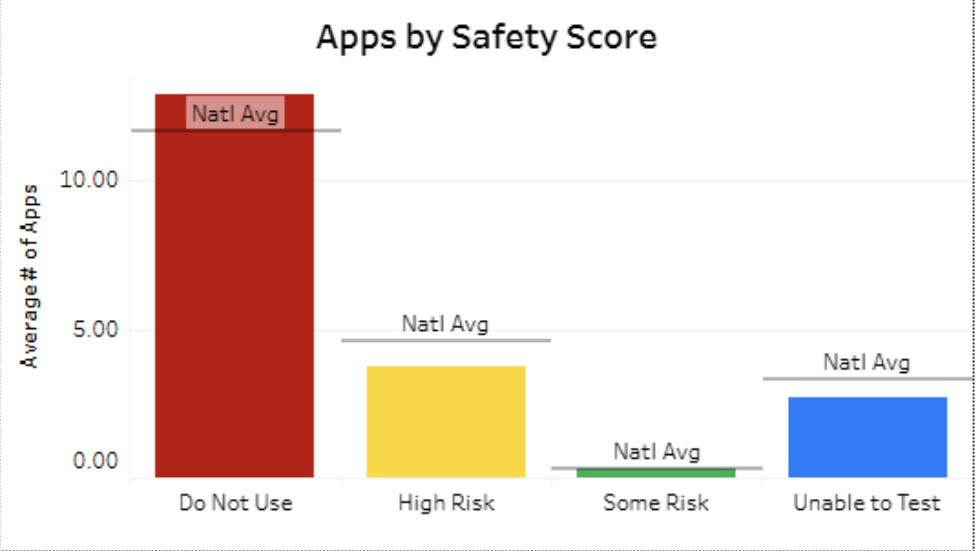
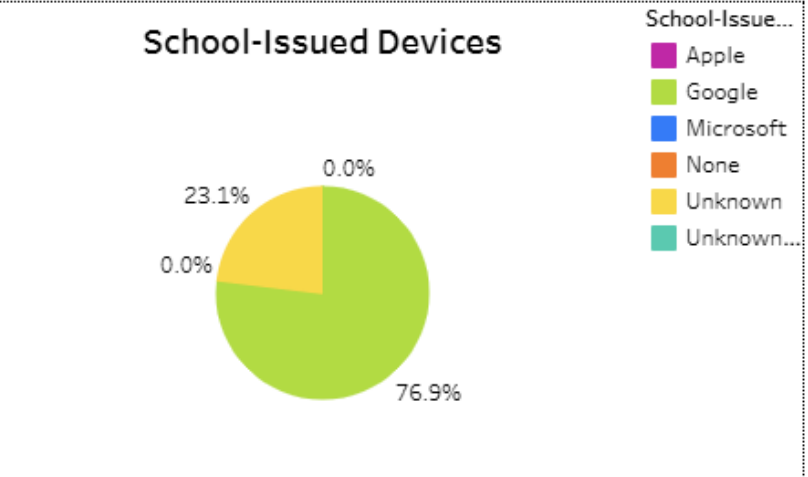


NOTE: Our sampling methodology represents a national sample. The state summaries reflect only the 13 schools studied in the state and should not be considered a reflection of the state’s overall behavior.

Vermont Summary  
K-12 EdTech Benchmark (2022)



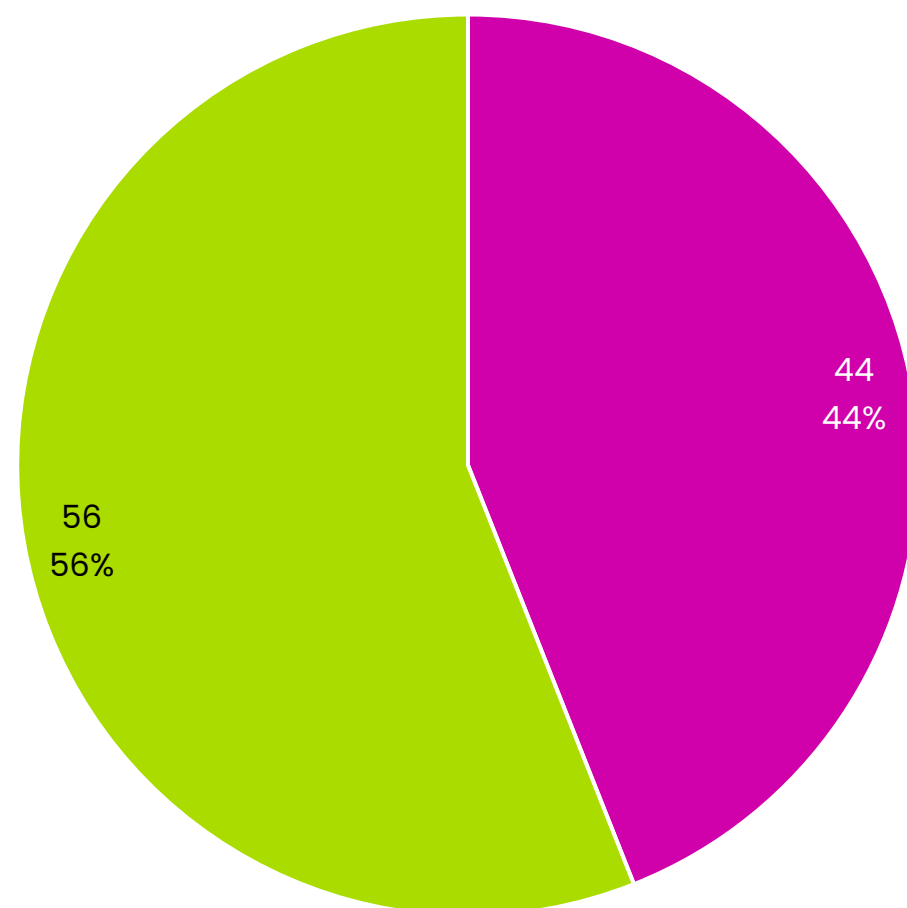
| School & Website Information   |                                            |                   |                      |                     |                                |                                  |                            |
|--------------------------------|--------------------------------------------|-------------------|----------------------|---------------------|--------------------------------|----------------------------------|----------------------------|
| School Name                    | School District                            | Education Level   | Website Platform     | Website Advertising | Red Trackers                   | Yellow Trackers                  | School Composite App Score |
| Bennington Elementary School   | Southwest Vermont Union Elementary Sc..    | Elementary School | School Messenger P.. | None                | Google Analytics               | Google - Other                   | 123.2                      |
| Brattleboro Union High School  | Windham Southeast Unified Union School..   | High School       | Google Sites         | None                | DoubleClick, Google Analytic.. | YouTube, Google - Other, Twitter | 47.3                       |
| Christ the King School         | N/A                                        | Private           | eCatholic            | None                | Google Analytics, Facebook, .. | None                             | 17.3                       |
| Essex Middle School            | Essex-westford Educational Community ..    | Middle School     | Finalsite            | None                | Google Analytics, Facebook, .. | Google - Other, Twitter          | 56.7                       |
| Fairfield Center School        | Maple Run Unified School District          | Middle School     | Apptegy              | None                | None                           | None                             | 26.9                       |
| Founders Memorial School       | Essex-westford Educational Community ..    | Elementary School | Finalsite            | None                | Google Analytics, Facebook, .. | None                             | 84.5                       |
| Green Street School            | Windham Southeast Unified Union School..   | Elementary School | None / Unknown       | None                | Google Analytics               | None                             | 78.9                       |
| Hartford High School           | Hartford School District                   | High School       | None / Unknown       | None                | Facebook                       | Google - Other, Twitter          | 21.3                       |
| Lake Region UHSD #24           | Lake Region Uhsd #24                       | High School       | None / Unknown       | None                | DoubleClick                    | YouTube, Google - Other          | 33.6                       |
| Main Street Middle School      | Montpelier Roxbury Unified Union School .. | Middle School     | Google Sites         | None                | Google Analytics, Adobe (Typ.. | Google - Other, Square Space     | 44.0                       |
| Middlebury Union Middle School | Addison Central Unified School District    | Middle School     | Finalsite            | None                | Google Analytics, Facebook, .. | YouTube, Google - Other          | 74.5                       |
| Orchard School                 | South Burlington School District           | Elementary School | Finalsite            | None                | DoubleClick, Google Analytics  | YouTube, Google - Other          | 54.0                       |
| South Dummerston Middle School | South Dummerston School District           | High School       | Finalsite            | None                | DoubleClick, Google Analytics  | YouTube, Google - Other          | 44.2                       |



# 2024 Utah State Board of Education Project

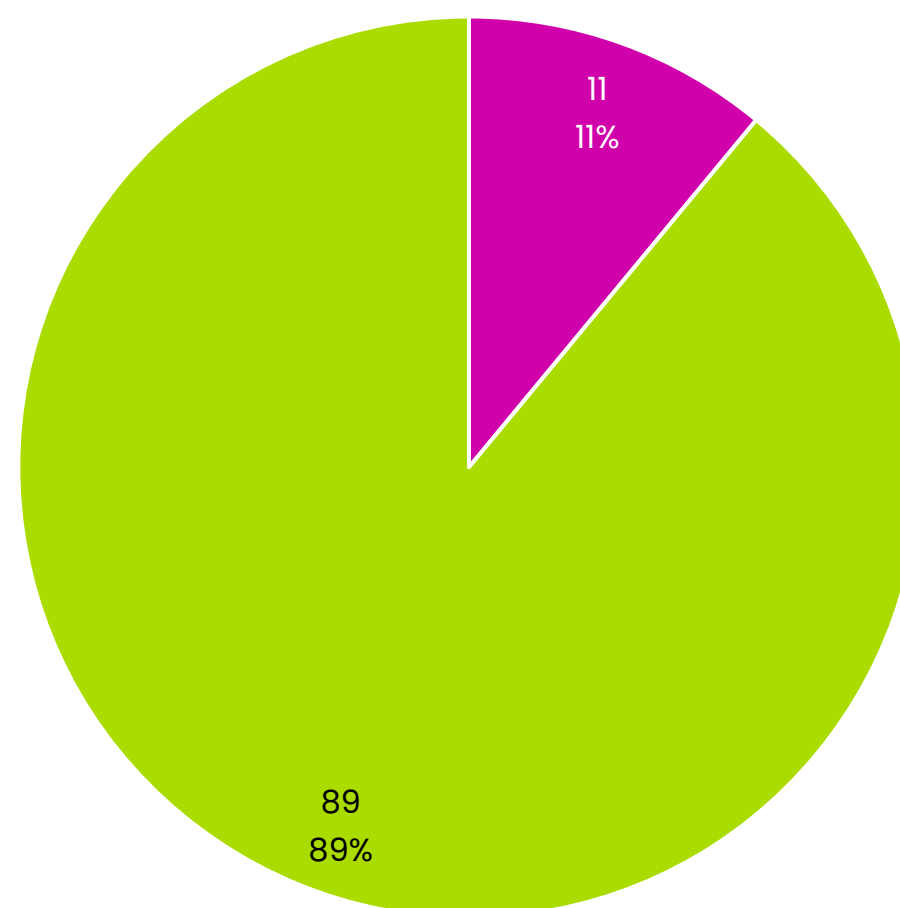


Unidentified Data  
Collection



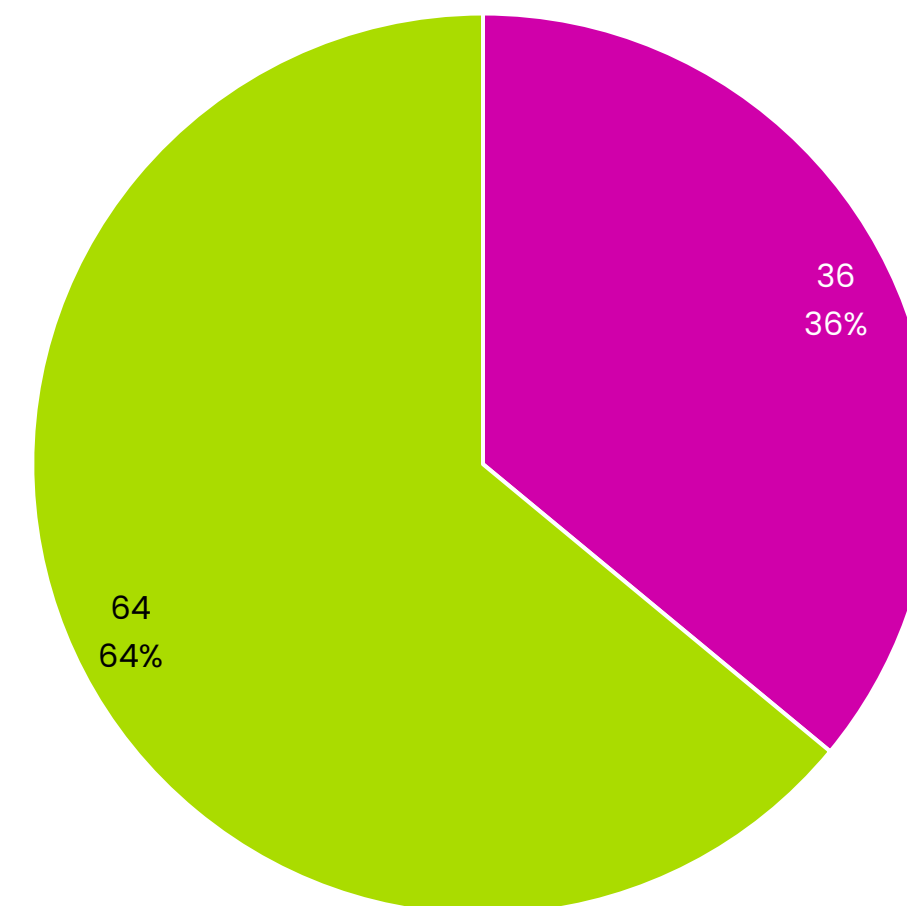
Yes No

Unidentified 3rd Party  
Sharing



Yes No

Sharing with Adtech



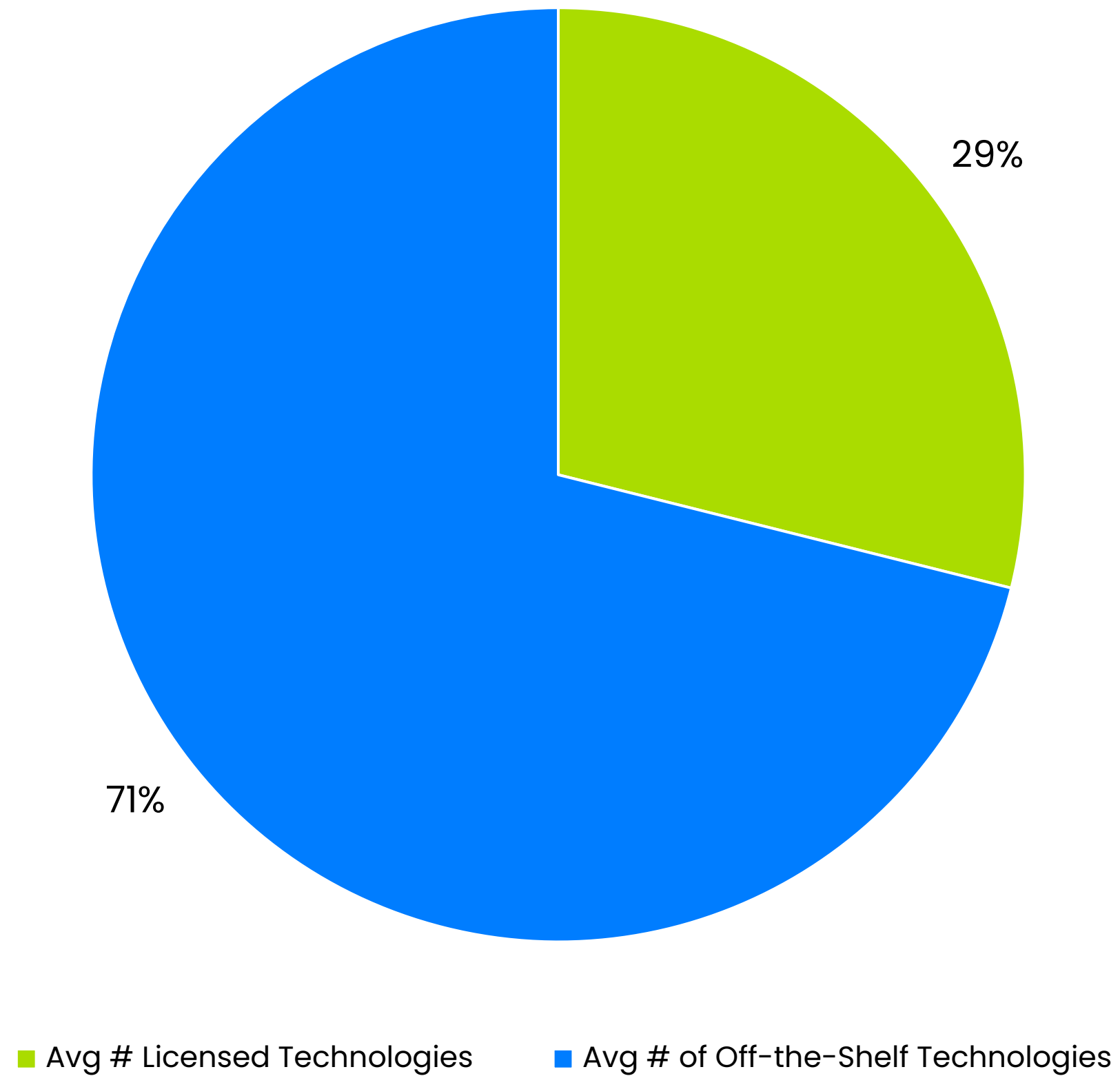
Yes No

“Utah EdTech App Data Collection and Sharing: 2023-25 Investigation”, August 20, 2025,  
<https://www.schools.utah.gov/studentdataprivacy/files/Utah%20EdTech%20App%20Data%20Collection%20and%20Sharing%20-%202023-25%20Investigation.pdf>

# 2022 K-12 EdTech Safety/Privacy Benchmark



# Average # of Licensed vs. OTS Apps



# Commercial Surveillance Research

# Common Identity Across Every Touchpoint



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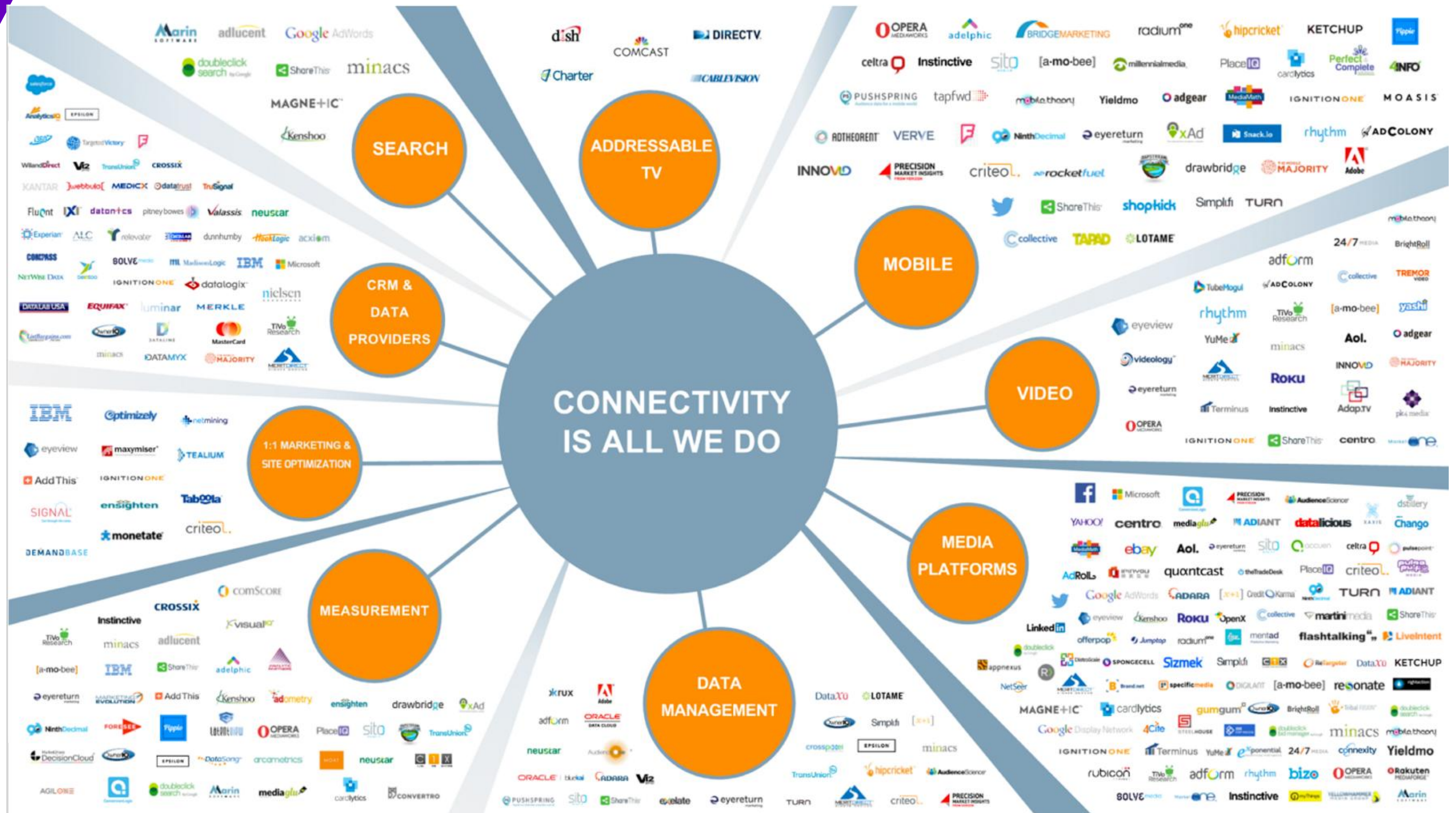
Slide 16 of 23



[https://static1.seekingalpha.com/uploads/sa\\_presentations/953/44953/slides/16.jpg?1565037350](https://static1.seekingalpha.com/uploads/sa_presentations/953/44953/slides/16.jpg?1565037350)

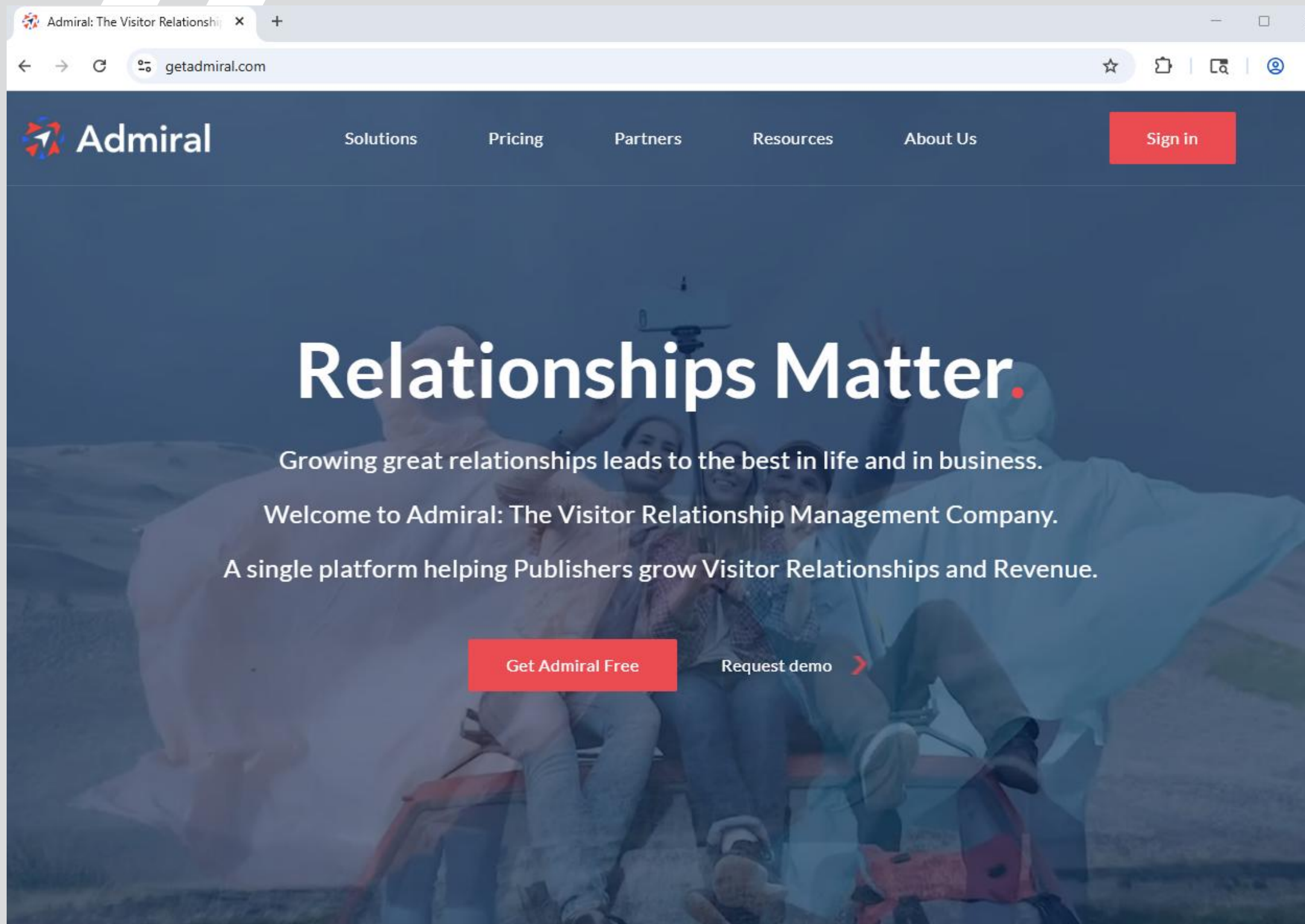
“The Worldwide Web of Human Surveillance: Customer Data Platforms and Identity Resolution Platforms”

<https://internetsafetylabs.org/resources/reports/the-worldwide-web-of-human-surveillance-identity-resolution-customer-data-platforms/>



<https://docs.liveramp.com/connect/en/image/uuid-fabcb871-4289-b364-1f23-adfef7086887.png>

“The Worldwide Web of Human Surveillance: Customer Data Platforms and Identity Resolution Platforms”  
<https://internetsafetylabs.org/resources/reports/the-worldwide-web-of-human-surveillance-identity-resolution-customer-data-platforms/>



<https://www.getadmiral.com/>



# Thank You!