



Becoming CIPA Compliant with Google Apps and Office 365

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Introduction

Google Apps for Education and Microsoft Office 365 Education are becoming increasingly popular cloud platforms among schools and districts. Google Apps has over 40 million students, teachers and administrators today¹ – a whopping 300% increase in users since 2010.² Schools are thrilled that they can now foster stronger communication and collaboration in and outside the classroom, save on system support costs, and teach their students how to use technology professionally.

As useful and as popular as Google Apps and Office 365 are for learning, they may not be fully compliant with the Children's Internet Protection Act (CIPA). Schools need to take extra measures beyond a typical Internet filtering system to ensure that they are abiding by this federal law, as there could be severe repercussions for failing to do so. This white paper will explain why Google Apps and Office 365 may not be fully CIPA compliant and present the possible solutions that may help schools gain the benefits of Google Apps or Office 365 while keeping their students protected and achieving CIPA compliance.

Overview of CIPA

The Children's Internet Protection Act (CIPA) is a federal law that requires all K12 schools and libraries to ensure that their students are protected from pornographic, obscene and other harmful content online. Enacted in 2000 to address concerns about access to inappropriate content over the Internet on school and library computers, CIPA imposes a set of requirements, outlined by the Federal Communications Commission (FCC), that schools and libraries must abide by to be eligible for federal funding or discounts offered by the FCC's E-Rate program. The FCC states that schools must adopt and implement an "Internet safety policy that includes technology protection measures," and these measures "must block or filter Internet access to pictures that are (a) obscene; (b) child pornography; or (c) or harmful to minors." Schools must also ensure "the safety and security of minors when using electronic mail, chat rooms and other forms of direct electronic communications."³

Google Apps & Office 365 May Not Be Fully CIPA Compliant

Neither Google nor Microsoft take responsibility for ensuring that their services comply with CIPA. While Google Apps is said to be in compliance with the Children's Online Privacy Protection Act (COPPA) and the Family Educational Rights and Privacy Act (FERPA), Google does not have any published policies regarding CIPA in its compliance documentation.⁴ Microsoft's regulatory policy, on the other hand, clearly states that "customers must independently assess whether their Internet safety policy complies with CIPA obligations (including technological measures governing web access entirely unrelated to Office 365)."⁵

Google and Microsoft are strong advocates of Internet freedom. For them, providing users across the globe with uncensored access to information takes precedence over meeting the CIPA compliance needs of a relatively narrow US K12 market.^{6,7} This leaves schools solely responsible for implementing appropriate technology measures to ensure student safety and CIPA compliance.

An Internet Filter May Not Be Enough for CIPA Compliance

An Internet filter is an integral technology protection measure for CIPA compliance, but may not be comprehensive enough on its own to make a school fully compliant. Most Internet filters are unable to filter online communication tools or encrypted emails and also cannot cover activity on school-provided devices or software outside of a school's network.

Internet Filtering Services Rarely Filter Online Communication Tools

Internet filtering services filter content by URL, IP address and/or keyword, but rarely filter content in images, leaving online communication tools such as email or shared text files unfiltered. This is in violation of CIPA, which requires school districts to use protection measures that block or filter inappropriate images in all online communications.

Internet Filters Cannot Review Encrypted Emails

Gmail and Outlook, email services available with Google Apps and Office 365 respectively, are served over Secure Socket Layers (SSL), meaning all emails sent through these clients are encrypted. Regular Internet filtering systems cannot filter encrypted content, which violates CIPA and jeopardizes the safety and security of minors using email.

Internet Filtering Services Cannot Filter Out-Of-School Activity

Schools cannot monitor and control student activities outside of their network and scope of Internet filtering. Without an added layer of filtering, students can access and download inappropriate content outside the classroom, either on a personal computer or a school-provided 1:1 device. This can lead to students sharing inappropriate content through the communications tools within Google Apps or Office 365, and can alternatively lead to students bringing inappropriate content to the classroom and sharing it with their peers on school property. This may leave a district liable and in violation of CIPA.

The Consequences of Not Filtering Google Apps & Office 365

Many districts who use (or plan to use) Google Apps or Office 365 believe they do not need filtering to comply with CIPA because they restrict students to sending and receiving email within the school domain only. However, districts who fail to address the previously discussed security vulnerabilities may put student safety and security at risk, experience parental complaints and lawsuits, and put their E-Rate funding in jeopardy.



Student Safety at Risk

Without proper safety measures in place, students are in danger of being exposed to pornography, online predators and dangerous websites, such as illegal gambling or adult dating sites. Elementary children have been exposed to pornography through school-issued devices that lack proper filters.⁸ Overexposure to pornography can negatively affect students' mental well-being,⁹ and has been shown to increase the likelihood of physical and sexual abuse between students.¹⁰



Potential Lawsuits

Schools may also suffer legal action for failing to protect children from inappropriate materials and activities online. Schools have faced parental complaints for not setting up adequate filtering systems on school devices to block pornography.¹¹ For example, in February 2015, a Missouri school district came under fire after a second-grader was exposed to pornography and other inappropriate comments through an electronic device given to her by the school district.¹² Though parental complaints do not always lead to lawsuits, schools have been sued in the past for failing to report sexual abuse.¹³



Loss of E-Rate Funding

Schools can get funding to cover between 20% and 90% of their Internet costs under the E-Rate program,¹⁴ but they must be CIPA compliant to qualify. This means that schools must have an Internet safety plan, with proper technology protection measures in place for not just Internet browsing but for all online applications that rely on the Internet, including Google Apps and Office 365.

The Universal Service Administrative Company (USAC) periodically audits schools to ensure they are fulfilling the FCC's requirements for CIPA compliance.¹⁵ Some districts have come under serious scrutiny in the past for not having an Internet safety policy¹⁶ and for lacking proper documentation¹⁷ as required by the USAC, leading to their E-Rate funding being threatened. Districts may be at a greater risk of losing funding now that USAC has revamped the E-Rate program to include more frequent and stringent E-Rate audits.^{18,19}

Solutions for Filtering Google Apps & Office 365

Typical Internet filters do not offer the email or file-sharing filtering that is needed to keep students safe and a school's Google Apps or Office 365 platform CIPA compliant. But this does not mean that a district needs to give up on these powerful platforms. There are numerous solutions that schools can consider to address the vulnerabilities of existing Internet filters, though not all of them provide everything a district might want in one complete package.

Solution 1: Internet Content Filter with IP, URL & Image Filtering

Using an Internet content filter that comes with image filtering in addition to the typical IP and URL filters will help a school become CIPA compliant. However, adding these extra image filters will slow down network traffic significantly, which makes this an impractical option, and explains why Internet filtering providers rarely offer image filtering. Furthermore, this option does not typically cover Internet activity outside the school network. In other words, students using personal devices at home or school-provided 1:1 devices will not be protected. Unless the school gets an additional cloud-based filter, students will be left susceptible to harm and the school open to parental complaints and negative publicity.

✓	May help schools achieve CIPA compliance for all Google Apps and Office 365 tools
✗	Internet filtering providers rarely offer image filtering
✗	Only covers communication within the school network
✗	Significantly slowed Internet traffic due to extra filters
✗	Insufficient for 1:1 devices. A cloud-based web filter would be needed
✗	Costs \$5+ per account annually

Solution 2: Block All Emails with Image Attachments

Schools may be able to become CIPA compliant by changing the settings on Google Apps or Office 365 to block all emails with an image extension. This option is easy to set up and is the only option that is entirely free. However, this option only filters emails, leaving Google Docs and Office Web Apps vulnerable and possibly out of compliance with CIPA. Additionally, users will be frustrated with emails being blocked, and this could potentially lead to civil lawsuits because of freedom of speech infringements.

✓	Easy to set up on Google Apps & Office 365
✓	May help schools achieve CIPA compliance for email filtering
✓	This option is free
✗	May not be CIPA compliant for Google Docs or Office Web Apps
✗	Email restriction will lead to user frustration
✗	Overblocking brings a risk of civil rights lawsuits

Solution 3: Spam Filter with a Built-In Image Filter

Schools may be able to use a spam filter with a built-in image filter to fulfill the CIPA requirement for email filtering. Spam filters with image filters cost between \$8 and \$15 per student account, plus extra charges and resources for setup and ongoing management. They also slow down network traffic as emails need to be downloaded to be filtered. Plus, spam filters only filter emails and do not extend to Google Docs or Office Web Apps; this may prevent a district from achieving full compliance with CIPA.

✓	May help schools achieve CIPA compliance for email filtering
✗	Cost for setup and ongoing management
✗	For Office 365, network traffic will be slower
✗	Not CIPA compliant for Google Docs/Web Apps
✗	Costs \$8-\$15 per account annually

Solution 4: Cloud CIPA Filtering Built Into Google Apps & Office 365

With this solution, an automated and monitored cloud CIPA filter is built onto Google Apps or Office 365 to flag inappropriate content and images without interfering with network speed. This option may help districts achieve CIPA compliance for email and all other tools in Google Apps and Office 365. Furthermore, this solution costs between \$2 and \$4 per student, and there are no additional costs or resources needed for setup, maintenance or infrastructure. This is the ideal option due to its minimal cost and wide array of capabilities.

✓	May help schools achieve CIPA compliance for all Google Apps and Office 365 tools
✓	No setup, management or infrastructure costs
✓	Network will not be affected
✗	Costs \$2-\$4 per account annually

Summary of Filtering Solutions for Google Apps & Office 365

Consideration Factors	1. Internet Filter with Image Filter	2. Block All Emails with Image Attachments	3. Spam Filter with Image Filter	4. Automated Cloud CIPA Filtering
Filter all online tools	Yes	No	No	Yes
Affects network speed	Yes	No	Yes	No
Annual cost per student	\$5	Free	\$8-\$15	\$2-\$4
Restricts Internet usage	No	Yes	No	No
Set up & maintenance costs	Yes	No	Yes	No
Other factors	Rarely accessible in the market	User frustration & danger of possible lawsuits		

All of the discussed filtering options have their benefits and disadvantages. An Internet filtering service that uses image filtering (**Solution 1**) is rarely available in the market because it significantly slows down network traffic. Blocking all emails with an image attachment (**Solution 2**) is free and may fulfill CIPA for email filtering, but it leaves Google Docs and Office Web Apps vulnerable and out of compliance with CIPA. Of the two remaining viable options, an automated cloud CIPA filter (**Solution 4**) is able to filter all of the online communication tools at a lower cost than a spam filter with email filter (**Solution 3**), and it does so without affecting network traffic.

Conclusion

Google Apps for Education and Microsoft Office 365 Education allow schools to foster stronger communication and collaboration among educators and students, and serve as a learning opportunity in using cloud applications professionally. To ensure that a district is harnessing all of these benefits without risking students' safety, the loss of school E-Rate funding, or potential lawsuits against the district, districts must make the Google Apps or Office 365 platform fully CIPA compliant. While there are several solutions that can address the requirements for CIPA compliance, a cloud CIPA filtering solution is the best option. It may fulfill all CIPA requirements at minimal cost, and in comparison to the other solutions, it offers the most benefits to a school.

About SchoolMessenger

SchoolMessenger offers SafeMail, an email filtering and human monitoring system for Google Apps for Education and Microsoft Office 365 Education, designed to help schools achieve compliance with student Internet safety laws.

SchoolMessenger is the trusted provider of K12 communications solutions. Thousands of school districts, charter schools, private schools, and other educational institutions in all 50 states depend on the company's products and services to engage with their communities in multiple languages and on any device, from notifications and websites to custom mobile apps and social media.

SchoolMessenger SafeMail seamlessly integrates with the Google Apps for Education and Microsoft Office 365 Education platforms to help keep students protected and schools legally compliant. To provide schools with further security and peace of mind, SchoolMessenger SafeMail comes with a Human Monitoring System (HMS). This system combines sophisticated email filters with a dedicated team of Human Monitoring Specialists who review flagged messages in real time and alert schools about issues of concern.²⁰

The HMS team has helped school districts address issues of suicidal intentions, cyberbullying, profanity, sexual abuse and threats of violence. With the HMS, parents and administrators can rest assured knowing that their students' emails and other forms of direct electronic communications are safe, secure, and supervised by trained and experienced people.

Services	Google Apps / Office 365	Required by Law for Student Use	Google Apps, Office 365 + SafeMail's CIPA Filters
Use of Google Apps or Office 365 Email Platform	✓		✓
Profanity and Keyword Filtering	✓	✓	✓
Image/Attachment Scanning for Pornographic Content		✓	✓
Student Internet Safety Course/Digital Citizenship Training Resource		✓	✓
Preconfigured Walled Gardens to Restrict Who Students Can Email*		✓	✓
Human Monitoring System for Added Security			✓

*Required for compliance with the Children's Online Privacy Protection Act (COPPA)

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