

Solicitation: 005-RFP-0317-2023



**Response to the State of Iowa,
Departments of Administrative Services & Education**

Education Savings Account Administration

Technical Proposal

Solicitation: 005-RFP-0317-2023

Submission Date: February 14, 2023

Prepared by: Student First Technologies

Contact: Mark Duran, Co-Founder & CEO

Phone: 231-881-8922

Email: mark@studentfirsttech.com



Table of Contents

Transmittal Letter	4
Executive Summary	6
Firm Proposal Terms	11
Respondent Background Information	11
Experience	16
Our Vision	21
Client Relationships	21
Letters of Reference	22
Termination, Litigation, and Debarment	23
Criminal History and Background Investigation	23
Acceptance of Terms and Conditions	23
Mandatory Specifications	23
Software Platform Details	31
Administrator Portal	32
Schools and Provider Map and Marketplace	36
Family Portal: Application and Digital Wallet	37
Technology	41
Insurance	41
System Access and Architecture	41
Data Safety, Availability, and Controls	44
Platform Security and Accessibility	45
Approach to Accountability	46
Fiscal Management and Payment	47
Funds Distribution	48
Security	48



Reporting	50
Customer Service	51
Program Administrator Support	51
Helpdesk Support	51
Support Design	53
Client Support Portfolio	54
Training	54
Implementation Plan	56
Consulting and Professional Services	56
IA DOE Program Administration	58
Subcontractors	59
Implementation Schedule	60
Optional Services	61
Embeddable Widgets	61
Family Funded Digital Wallets	62
Family Engagement and Marketing	62
Appendix A – Indiana Learns Case Study	64
Appendix B – Letter of Reference	67
Appendix C – References	69



Transmittal Letter

February 14, 2023

Karl Wendt
Iowa Department of Administrative Services
1305 E Walnut St
Des Moines, IA 50319

Dear Karl,

As co-founders of Student First Technologies (Student First), we are excited to submit this proposal for your consideration and review.

Student First Technologies was founded with the belief that every child deserves access to high-quality education, and we are driven daily by our goal to empower programs that support families by entrusting them to choose the best-fit education for their children. Combined, we have over 20 years of combined experience working in technology and supporting education agencies by creating efficient and equitable software solutions.

The Student First platform facilitates the administration of over \$100 million annually in K-12 education funding to families across the country. Our team has extensive experience in user-friendly technology, education, finance, risk management, and state policy environments, providing a collective wealth of knowledge that empowers us to provide efficient, effective service and support to all our partners. You can rest assured that no questions, big or small, will go unanswered or unattended and that we will represent your state agency, program, and families with the utmost professionalism and highest level of competency.

We are unique as a company in this space because of our family-focused vision, years of experience, and focus on providing user-friendly and holistic education funding program administration. Furthermore, Student First is the only provider with a co-founder serving as the Chief Technology Officer (CTO) and personally leading our U.S.-based development team. This provides unparalleled



service with best-in-class response times to all technical questions, quality assurance, and uncompromising product development and support.

Providing a user-friendly experience alongside best-in-class customer service and security are central to Student First's approach. **Our cloud-based platform, *Theodore*, serves as evidence of this ethos – a fully customizable, end-to-end solution with the most robust subset of features in the education funding technology space.** Furthermore, *Theodore* is the only third-party technology platform that offers families a digital wallet, a budgeting tool, and the ability to schedule services directly with education providers from inside their accounts.

Thank you for your review and consideration. We hope to serve you and the great state of Iowa!

Respectfully submitted,

Mark Duran

Mark Duran, Co-Founder and CEO
231-881-8922
mark@studentfirsttech.com

Forrest Fowler

Forrest Fowler, Co-Founder and CTO
812-320-7543
forrest@studentfirsttecch.com

Student First Technologies
304 W Kirkwood Ave., Suite 101
Bloomington, IN 47404

Executive Summary

Contract Provisions

We, as Responsible Respondent, have reviewed Section 6.2 and accept the terms and conditions in the RFP as they currently stand.

Iowa's Need

As the educational impacts of COVID-19 make themselves clear, states around the country are leveraging innovative approaches to fund education efficiently and equitably. As reported in Director Ann Lebo's 2022 Condition of Education Report, 2022 saw nearly 490,000 students enrolled in Iowa's public schools and just over 33,000 in nonpublic. Students of color make up 26.8% of public school student enrollment and 16.9% of nonpublic. Over 40% of Iowa students are eligible for free and reduced lunch.¹ This illuminates the scope of the opportunity in Iowa and the great need to prepare all students for success.

2023's Students First Act, or HF 68, outlines a program that has a strong vision for educational access for every Iowa student and a policy design that has been described as "the most expansive and inclusive in the country."² This is no small feat, and the alignment of the IA DOE and Governor Reynolds in the fact that "educational freedom belongs to all, not just those who can afford it" completely coincides with the motivating force behind Student First Technologies' work over the last decade.³

Strong implementation of Iowa's ESA program, including a flawless and fraud-free administration, sets the stage for the policy's effective expansion to universal student eligibility in 2026.

¹ Source: https://educateiowa.gov/sites/default/files/2022-12/2022ConditionOfEducation12_2_22_0.pdf

² Source: <https://alec.org/article/iowa-passes-the-nations-most-expansive-and-inclusive-esa-program/>

³ Source:

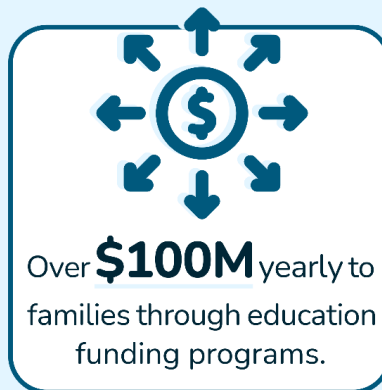
<https://governor.iowa.gov/press-release/2023-01-23/gov-reynolds-statement-students-first-act-passing-iowa-house-and-senate>

Student First Technologies

Student First Technologies (Student First) aims to connect families to meaningful programs and opportunities by closing the digital divide on education funding programs. We put the end user first, by increasing parent access and creating efficiencies for high-quality schools and providers.

Student First has more than a decade of experience operating within education funding programs of all types and has supported organizations across 15 states in their implementation since 2013. Our deep understanding of program mechanics – not only of the critical technical and security elements needed for a strong launch, but the national best practices and policy implications have increasingly put us at the forefront of program implementation in partnership with state and non-profit entities.

Our Impact



We are driven by the desire to support families with the greatest need for these funds, helping them access high-quality education experiences and services for their children. We know on a very personal level the difference that a compelling, quality academic experience makes for a student and their outcomes. Too often outcomes are determined by a child's zip code or background, and it is our belief that programs such as the one outlined by the State of Iowa have the power to change that reality.



We know this work doesn't happen in a vacuum, and we strive to serve as thought partners with our clients to support sustainable implementations that operate above reproach, are free from fraud and misuse, and build the momentum needed for year-over-year buy-in. This is achieved through close client relationships where we are partners in problem-solving through excellent communication, rigorous development and user testing, and continuous process improvement.

Student First has had the true pleasure of building technical management systems for scholarships, tax credits, microgrants, ESAs, and other education funding programs across the country.

Our Strategy

The Student First Technologies team's role is to add demonstrable value at every project stage and to serve families and program administrators. We live this value through excellent communication, rigorous development and user testing, and continuous process improvement. Our team thoughtfully supports implementation with a structured discovery phase, thoughtful user-focused design, and robust project management systems.

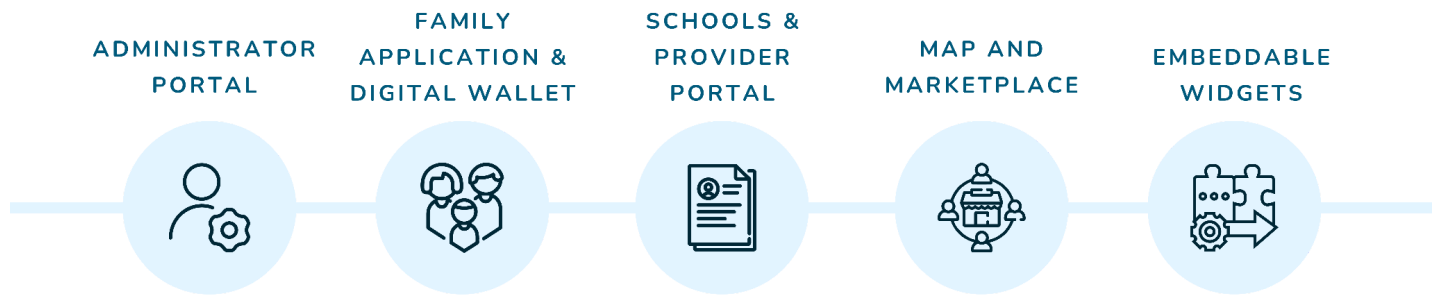
The *Theodore* platform is our multi-tenant "portal"-based system designed to support all end users of an Education Savings Account program. End users include:

Administrators, whose program tasks include school, provider, and parent enrollment review and qualification, acceptance and rejection of educational products and services, and ultimately disbursement of funds to approved schools and providers for approved services.

Approved schools and program providers, whose tasks include submitting tuition and fees for payment, providing qualified products and services to approved families, verifying enrollment or attendance, and invoicing for approved services.

Most importantly, the family users, who can view their usable funds in their digital wallet, browse approved schools and eligible providers in their area, and submit education expenses for review by administrators.

This design supports families and gives them optimal autonomy and agency in the use and selection of schools and services while protecting the fidelity of the fund's intention.



The family experience is critical in ESA implementation, and while the majority of Iowa students speak English, Spanish is the second most populous language. Student First proudly partners with native speakers to perform a full, true translation of all platform elements. This is truly unique in a landscape of technology companies that rely on “out of the box” solutions to translate web-based systems, resulting in inconsistent quality and meaning. Furthermore, we thoughtfully support marketing and family engagement efforts to target student populations at the highest eligibility levels, maximizing IA DOE’s impact.

Because Student First has been at the forefront of education funding program implementations across the country for the last decade, we understand the sustainability challenges these programs can face as well as the emergent best practices. Thus, we have taken a firm stance that we will follow the national best practice of implementing support strategies whose cost does not exceed 5% of programmatic funds. This includes the technical design and development of the platform product, as well as ongoing security and maintenance costs. In addition to this, we voluntarily assume a fiduciary role, meaning we have taken steps to distance ourselves from any interest or conflict with education service providers and have no investors or shareholders who invest in education service companies. This further distinguishes us in the market of providers and is a stance based on our internal company values.

Best-in-class, sustainable, program design does not cap the number of user seat accounts, and does not structure pricing on per user or solely flat fee structures. Our dynamic flat fee pricing strategy provides a sustainable answer to impact driven programs that will grow over time.



Further distinguishing us is our pricing strategy which explicitly abstains from per user pricing and flat fee structures. What many program administrators don't know is that the incremental cost per user in technology is less than \$0.001 per user seat. We believe that per user seat cost structures are a poor fit for impact-focused programs that aim to serve a growing number of users over time. Similarly, flat fee pricing does not service a program well as it creates misaligned incentives between program administrators and policymakers seeking to grow program participation.

We believe all of this uniquely positions us to provide Iowa with the service solution it needs to fulfill its goal of quickly providing eligible students and their parents with high-quality services while creating a sustainable practice that is free from the perception of conflicts of interest, fraud, or other misuse.

Conclusion

Thank you, again, for the opportunity to share why Student First is the best-in-class solution for Iowa's Education Savings Account administration. We look forward to building a long-term partnership together and to exceeding your expectations at every opportunity.

Firm Proposal Terms

As Respondent, Student First Technologies guarantees that the goods and services outlined in this proposal are available and will remain firm for 120 days after the February 14, 2023 submission date outlined in 005-RFP-0317-2023.

Respondent Background Information

Indiana Instate Contractor Preference

Indiana has an Indiana Business preference for in-state contractors awarded by state agencies. Indiana Code 5-22-15-20.5 outlines the criteria and exceptions for this preference, including a 5% price preference for supplies purchased that are less than \$500,000.

Responsible Respondent Contact Information

Please contact Mark Duran, Co-Founder and CEO of Student First Technologies, for any communication or contractual matters regarding this proposal.

Responsible Respondent	Mark Duran, Co-Founder & CEO
Street Address	304 W Kirkwood Ave., Suite 101, Bloomington, IN 47404
Phone Number	231-881-8922
Email Address	mark@studentfirsttech.com

Company Background Information

SID3CAR CO DBA Student First Technologies is an Indiana S corporation.

Student First is a small team of seven, with long-term contractors on standby for additional needs, and multiple offers to additional full-time employees pending, dependent on continued company growth.



We are a profitable, founder-owned company, with zero outside capital interests. This means that we answer solely to our customers and are not subject to changes in capital markets or widespread economic turmoil.

Our commitment to sustainable, revenue-led growth and relentless focus on efficient technology and processes means that we grow alongside our partners. We maintain an extensive network of willing future employees through our participation in and thought leadership in the education sector.

Request for Taxpayer Identification Number and Certification

**Give Form to the
 requester. Do not
 send to the IRS.**

▶ Go to www.irs.gov/FormW9 for instructions and the latest information.

See Specific Instructions on page 3.	1	Name (as shown on your income tax return). Name is required on this line; do not leave this line blank. SID3CAR CO			
	2	Business name/disregarded entity name, if different from above DBA Student First Technologies			
	3	Check appropriate box for federal tax classification of the person whose name is entered on line 1. Check only one of the following seven boxes. <input type="checkbox"/> Individual/sole proprietor or single-member LLC <input type="checkbox"/> Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=Partnership) ▶ _____ Note: Check the appropriate box in the line above for the tax classification of the single-member owner. Do not check LLC if the LLC is classified as a single-member LLC that is disregarded from the owner unless the owner of the LLC is another LLC that is not disregarded from the owner for U.S. federal tax purposes. Otherwise, a single-member LLC that is disregarded from the owner should check the appropriate box for the tax classification of its owner. <input type="checkbox"/> Other (see instructions) ▶ _____ <input type="checkbox"/> C Corporation <input checked="" type="checkbox"/> S Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Trust/estate		4 Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3): Exempt payee code (if any) _____ Exemption from FATCA reporting code (if any) _____ <i>(Applies to accounts maintained outside the U.S.)</i>	
	5	Address (number, street, and apt. or suite no.) See instructions. 304 West Kirkwood Ave Suite 101	Requester's name and address (optional)		
	6	City, state, and ZIP code Bloomington, Indiana 47404			
	7	List account number(s) here (optional)			

Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN*, later.

Note: If the account is in more than one name, see the instructions for line 1. Also see *What Name and Number To Give the Requester* for guidelines on whose number to enter.

Social security number									
or									
Employer identification number									
8	2	-	1	7	6	0	9	2	8

Part II Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
3. I am a U.S. citizen or other U.S. person (defined below); and
4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.

Sign Here	Signature of U.S. person ▶	Date ▶ 02.14.23
------------------	----------------------------	-----------------

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Future developments. For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to www.irs.gov/FormW9.

Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) which may be your social security number (SSN), individual taxpayer identification number (ITIN), adoption taxpayer identification number (ATIN), or employer identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not limited to, the following.

- Form 1099-INT (interest earned or paid)

- Form 1099-DIV (dividends, including those from stocks or mutual funds)
- Form 1099-MISC (various types of income, prizes, awards, or gross proceeds)
- Form 1099-B (stock or mutual fund sales and certain other transactions by brokers)
- Form 1099-S (proceeds from real estate transactions)
- Form 1099-K (merchant card and third party network transactions)
- Form 1098 (home mortgage interest), 1098-E (student loan interest), 1098-T (tuition)
- Form 1099-C (canceled debt)
- Form 1099-A (acquisition or abandonment of secured property)

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN.

If you do not return Form W-9 to the requester with a TIN, you might be subject to backup withholding. See What is backup withholding, later.

Company Accounting

Student First uses Root Advisors accounting firm based in Bloomington, IN. We've included their phone number and address below.

Accounting Firm	Root Advisors
Address	1516 South Walnut Street; Bloomington, Indiana 47401
Phone Number	812-332-7200

Subcontracting

Student First Technologies intends to work with the following subcontractors on this project in service of adding maximum value to IA DOE.

Subcontractor	Operations Advising – Michael Lindell	Audrain Advising – Amber Audrain
Contact Information	mike@lindell.la 317-679-0018 Indianapolis, IN	amber@audrainadvising.com 417-522-4198 Greenwood, IN
Qualifications	Over 25 years of experience in multiple education funding roles including student loan origination and choice program administration, including completely digitizing the family and provider ESA experience in Indiana and positioning it as a model for other state implementations.	Nearly 15 years designing and implementing high-impact social programs with a particular focus on model policy implementation, digital transformation, and change management.
Services Performed	<ul style="list-style-type: none"> • Program Design & Implementation • Fiscal Reporting & Fund Management 	<ul style="list-style-type: none"> • Project Management • Program Design & Implementation • Consulting Systems & Management



Iowa Business Registration

Student First Technologies will complete Iowa's business registration process before the contract award for the ESA program.



Experience

Founded in 2017, Student First Technologies has been at the forefront of building and implementing education funding programs across the country in partnerships with state-affiliated and non-profit entities. Furthermore, they serve as thought partners on education choice technology solutions with national leaders like ExcellnEd and EdChoice and deeply understand not only the technical elements needed to support these programs but also the best practices and policy implications in such implementations. As you peruse our team’s experience and technical solutions, you will discover that a few key elements set Student First apart from other education funding platform providers.

Cofounder Expertise – Student First was built by co-founders Mark Duran and Forrest Fowler, who gained extensive experience in business and technology companies prior to founding Student First Technologies. Both were raised in entrepreneurial homes with alternative K-12 education experiences. This dynamic background provides the foundation and combined leadership skills necessary for responsible and effective company management and growth.

Team – The Student First team is composed of individuals with extensive technical backgrounds in education, state policy, finance, software engineering, project management, product development and service experience, as well as programmatic risk mitigation and compliance.

Education Focused – Our systems are unapologetically focused on supporting families in accessing high-quality education options and education funding opportunities, and every element of our systems supports this goal.

“Full Stack” – Student First Technologies’ platforms feature both complete front and back-end solutions, giving all users customized and consistent account experiences from when they create their account, to when they apply for programs, to how they leverage and interact with the platform day-to-day.

- **Administrator Functionality** – Our experience across multiple states and program types means our administrative & reporting solutions are well constructed and “battle tested” by the hundreds of administrators that sign into the *Theodore* platform every day, multiple times per day.

As demand continued to grow and new program designs emerged, the need for a more robust platform emerged. Our online, “cloud-based” platform, *Theodore*, is an end-to-end solution that is capable of handling any education funding program type, including ESAs, microgrants, and tax credit scholarships. Because each program is different, and the context for education funding differs depending on regional context and policy, *Theodore* is fully customizable for unique programmatic needs and requirements.

Student First's Theodore platform became the top national platform for the implementation and management of tax-credit scholarships in 2019. It's completely customizable design, and the team's deep education funding expertise, make it the perfect tool for ESAs as well.

For example, Student First recently supported the Indiana DOE and program administrators in launching a \$20M+ microgrant program, called Indiana Learns, for students experiencing learning loss as a result of COVID-19. The Indiana context called for a system that is simultaneously a family and provider platform and a digital wallet. In order to lower the barrier to entry for parents, having a single stop for accessing and leveraging services was critical.

We've prepared a brief overview of the custom components below, all of which can be customized for an ESA context.



Family Application and Digital Wallet

Families have one location to access the program from applying and submitting evidence of eligibility to checking their available awarded funds and finding high-quality providers and services. This singular, mobile-friendly, browser-based experience provides complete and easy access to families.



Provider Application and Portal

Providers submit their applications in the portal, where program administrators can either review the application or build system logic to automate the review process. Once approved, providers and program administrators can sign the agreement for service provision, post available sessions/services, take attendance, and submit invoices for payment right in the portal.



Provider Map and Marketplace

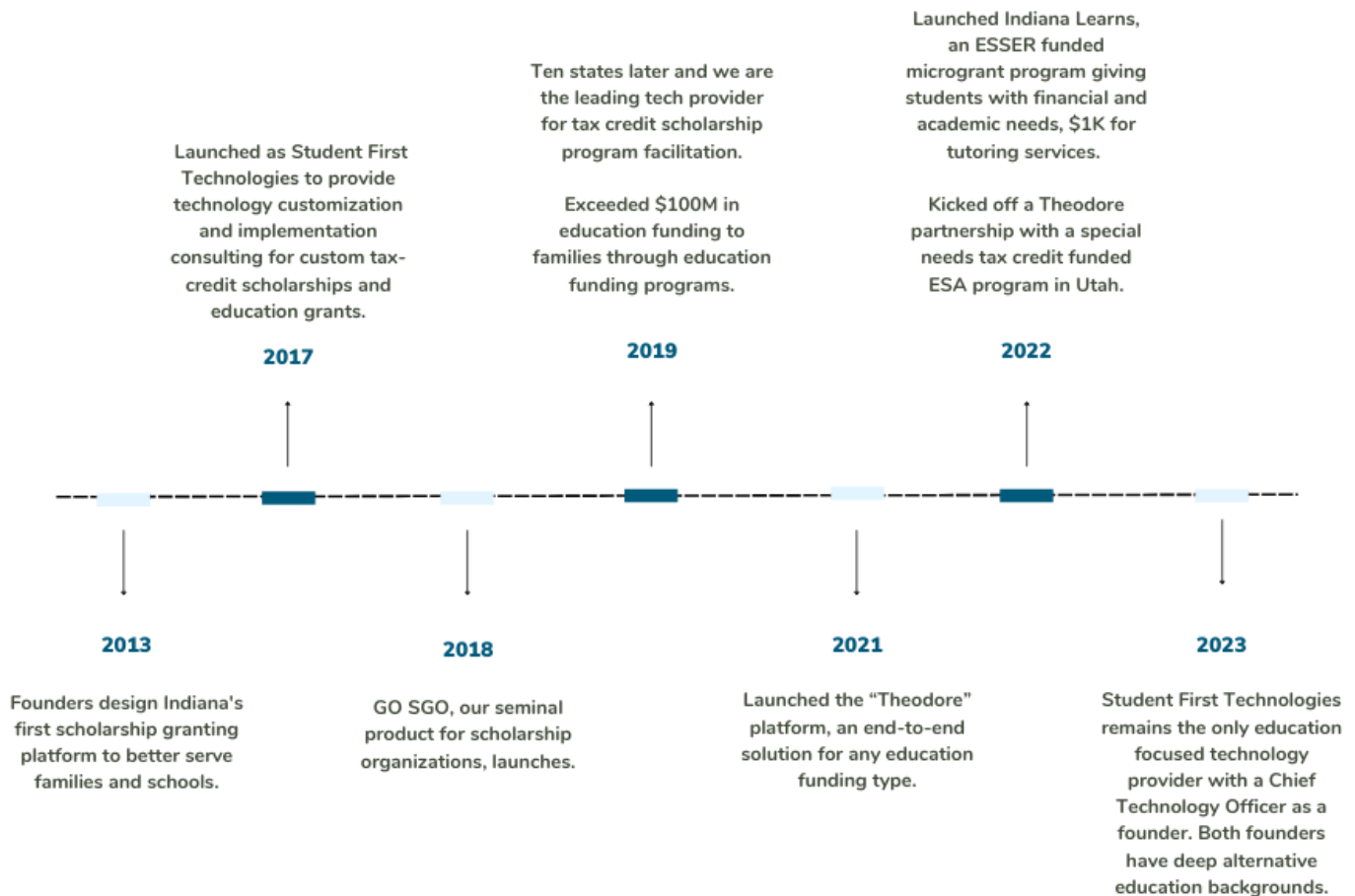
Approved providers will each have a profile outlining their services. They will appear on a searchable map and directory, where families can filter their results and find providers in their region. When selecting a provider, families can schedule available sessions and services.



Embeddable Widgets

Effective communication of available services and clearly defined paths for family access are critically important. Program administrators can choose embeddable widgets for both program eligibility and a map of providers. Both can be leveraged to promote action on external websites. To read more about the Indiana Learns implementation, please review the Indiana Learns Case Study in Appendix A.

We are humbled to see that demand continues to grow for education funding technology as states and non-profits make intentional steps to empower families to serve their children's education needs in innovative and equitable ways.



Student First Technologies has developed deep technical expertise in our first decade while elevating clients that have a heart for using digital-first tools to redesign systems of education funding to better serve families. The Student First team is composed of individuals with deep technical backgrounds in education, state policy, finance, software engineering, project management, product development/user experience, programmatic risk mitigation, and compliance.

Our mission to be the country's most trusted technology name for families navigating their K-12 education options stems from our founders' own unique experiences with non-traditional education.

Mark Duran: Mark was raised in an entrepreneurial family and was homeschooled for his K-12 education experience. This gave him a personal understanding of the alternative schooling space and early lessons in leadership and business management. This, paired with his business acumen,



extensive understanding of education funding systems, and clear vision for growth and impact emboldens Student First Technologies' business strategy.

Forrest Fowler: Forrest was also raised in an entrepreneurial family that values diverse alternative education experiences. His first experience in a classroom is now defined as a “learning pod” where parents rotated as instructors, before attending public school, and graduating from the Indiana University Kelley School of Business. Along the way, he attached himself to highly qualified mentors and taught himself software engineering before working in software design and various financial technology (“fintech”) roles. His robust technical expertise and leadership make him a strong CTO to set Student First Technologies' technical vision.

Our Vision

Student First Technologies aims to connect families to meaningful programs and opportunities by closing the digital divide on education funding programs. We put the end user first by increasing parent access and creating efficiencies for high-quality schools and providers. We did not start, nor do we run, as a venture capital-backed company that by nature, is first responsible to create returns for shareholders. We started small, grew thoughtfully, and are debt free, well-capitalized, and profitable, making us beholden only to our clients, partners, and users. We continue to grow thoughtfully, centering on our founding DNA of always putting students first.

Client Relationships

Our clients receive direct access to Student First Technologies' CTO and CEO during the contract life of the project, and we value partnering closely with program administrators to serve as thought partners for a scalable program design based on our experience in diverse education funding landscapes. Your project team will also include a product owner, a project manager, and a project coordinator to directly support all day-to-day work, keeping deliverables on target and communication channels transparent and efficient, while marshaling internal technical capacity.

Our role is to add demonstrable value at every project stage, and we do this through excellent communication, rigorous development and user testing, and continuous process improvement.

Letters of Reference

We submit a letter of recommendation in Appendix B from the clients listed in the table below. For more information about our experience and similar projects, please review the case study in Appendix A and the client references and testimonials in Appendix C.

Client	Contact Information	Service Context
Betsy Wiley: Institute of Quality Education	betsy.wiley@h4qed.org 317-870-2532	Largest Tax Credit Scholarship Granting Organization in Indiana.
Brandon Brown: The Mind Trust	bbrown@themindtrust.org 317-946-3644	Indiana Learns Department of Education ESSER funded microgrant education funding program.
Sarah Guardiola: Opportunity Scholarship Fund	sarah@osfkids.org 918-877-2710	Largest non-parochial Tax Credit Scholarship Granting Organization in Oklahoma.
Marylin Hicks: Arete Scholars	mhicks@aretescholars.org 404-445-7262	A leading Student Scholarship Organization in Georgia.
Ronnie Daniel: Children First Education Fund	ronnied@childrenfirsteducationfund.org 801-616-7848	Utah's first and only Tax Credit Scholarship & Tax Credit funded ESA program.



Termination, Litigation, and Debarment

Student First Technologies hereby guarantees that we do not, and have never had, any terminated contracts, any damages or penalties assessed, or any pending or actual litigation of any kind.

Criminal History and Background Investigation

As Respondent, Student First Technologies hereby explicitly authorizes the Agency to conduct criminal history and background investigations on its officers, directors, shareholders, partners, and managerial and supervisory personnel in service of the submission of 005-RFP-0317-2023.

Acceptance of Terms and Conditions

Student First Technologies accepts the General Terms and Conditions of 005-RFP-0317-2023. Student First has no exceptions or revisions at the time of response submission.

Mandatory Specifications

Student First Technologies acknowledges the mandatory specifications outlined in Section 4 of 005-RFP-0317-2023. We've outlined each specification and our plan for compliance below.

Respondent Requirements

<p>4.1.1 Respondent must have ability to administer funds for all Qualified Educational Expenses.</p>	<p>Yes</p>	<p>Student First Technologies can administer funds for all qualified expense categories and looks forward to developing control processes in partnership with IA DOE.</p>
<p>4.1.2 Respondent must be familiar with and comply with the applicable aspects of the following requirements regarding pupil's personally identifying including but not limited to:</p> <ul style="list-style-type: none"> • Family Educational Rights and Privacy Act (FERPA) 	<p>Yes</p>	<p>To comply with the Family Educational Rights and Privacy Act (FERPA) and Health Insurance Portability and Accountability Act (HIPAA), our systems implement best practices around student data. We do not solicit any information from students under the age of 13, however, we do implement best practices to comply with the</p>



<ul style="list-style-type: none"> • Health Insurance Portability and Accountability Act (HIPAA) • Iowa laws, rules, and regulations applicable to State’s current and published privacy and security policies and procedures 		<p>Children’s Online Privacy Protection Rule (COPPA) as outlined by the Federal Trade Commission (FTC).</p> <p>We are committed to working with the State of Iowa to ensure the platform complies with all state-specific laws and policies related to data security by launch date.</p>
<p>4.1.3 Respondent must be liable and bear all the responsibility of and resolve any complaints or issues a student’s representative may have towards the conduct of the evaluation and/or any privacy or data breaches under state or federal law.</p>	<p>Yes</p>	<p>We understand that we are responsible for the security of all data under our control. We understand that we are fully liable and bear all responsibility to resolve related complaints and issues.</p>

Service Requirements

<p>4.2.1 Services shall comply with HF68.</p>	<p>Yes</p>	<p>We have developed this proposal based on our current best understanding of HF68. We look forward to partnering with IA DOE on the full program design to ensure full compliance.</p>
<p>4.2.2 Services must be operational to allow a minimum of 30 days, and preferably 60 days or more, for parents or guardians of eligible pupils to submit an application to meet the June 30 deadline for the 2023-2024 school year.</p>	<p>Yes</p>	<p>It would be our internal deadline to make the family application operational by May 1, 2023, to give families the optimal 60 days for completion.</p> <p>This priority is grounded in the knowledge that families need optimized access and time when implementing new programs and that IA DOE needs an effective first application window to show early momentum.</p>



4.2.3 Families are to be notified of acceptance or denial within 30 days of submitting an application.	Yes	We will work with program administrators to create as many data and eligibility efficiencies for family applications as possible and then build clear workflows for application approval and subsequent digital wallet funding.
4.2.4 Respondent must allocate funds from each pupil's account for the payment of Qualified Educational Expenses incurred by the pupil's parent or guardian.	Yes	Upon program approval and parental acceptance of the terms of service, the student's digital wallet will be funded, and families will receive in-portal directions for the next steps for leveraging their ESA funds.
4.2.5 Respondent must have procedures in place to prevent waste, fraud, and abuse.	Yes	<p>We look forward to designing program control processes alongside IA DOE to approve expense categories at a service or expense level, as opposed to a provider or vendor level. Further, leveraging our in-system provider scheduling mechanism renders the misuse of funds on unallowable education service expenses unlikely.</p> <p>Additionally, we maintain a partnership with Modern Treasury and leverage their robust systems for compliance, fraud detection, and prevention. Their multitude of secure, encrypted payment options allow Student First Technologies to focus on delivering a best-in-class educational experience for families, providers, and administrators while leveraging the resources of Modern Treasury's expansive operation for payment processing and compliance.</p>
4.2.6 Upon determination of a false claim for an ESA, or improper payment from an ESA, respondent shall close the pupil's ESA. If improperly obtained amounts	Yes	We start by building system protocols and financial controls with program administrators to eliminate as much risk for fraud and misuse as possible. Upon launching an approved account, families must accept the terms of

<p>have been disbursed, respondent shall recover such amounts from the parent or guardian, including initiating legal proceedings to recover such amounts, if necessary.</p>		<p>service, consenting to spend funds appropriately.</p> <p>Upon suspicion of fund misuse or fraud, our team can at any time freeze user accounts, rendering scheduling and purchases temporarily infeasible.</p> <p>Student First Technologies will comply with the state's request for information and/or data related to legal proceedings initiated by the state.</p>
<p>4.2.7 Respondent must establish an individual account for that pupil in the education savings account fund. The amount of the pupil's education savings account payment shall be deposited into the pupil's individual account on July 15 or thirty days following submission of the application, whichever is later, and such amount shall be immediately available for the payment of qualified educational expenses incurred by the parent or guardian for the pupil during that school budget year.</p>	<p>Yes</p>	<p>Upon program approval and parental acceptance of terms of service, the student's digital wallet will be funded, and families will receive in-portal directions for the next steps for leveraging their ESA funds. This will occur within the 30-day window of their application submission.</p>
<p>4.2.8 Respondent must hold funds remaining in a pupil's individual account upon conclusion of the school budget year, and funds shall remain in the pupil's individual account for the payment of qualified educational expenses in future fiscal years during which the pupil participates in the program until the</p>	<p>Yes</p>	<p>A family's digital wallet will be held year-over-year, with annual ESA credits clearly logged for family clarity and audit tracking purposes.</p>

pupil becomes ineligible under the program or until the remaining amounts are transferred to the state general fund.		
4.2.9 Offshore performance of work is prohibited. Any services included in the resulting contract that directly serve the State or its clients and involve access to secure or sensitive data or personal client data shall be performed within the United States. This provision applies to work performed by subcontractors at all tiers.	Yes	No offshore work will be performed by Respondent nor by any of Respondent's subcontractors for the work outlined in this RFP. All data resides inside the continental United States.

System Requirements

4.3.1 Keep data secure. Any technology platform used for the program meets the State's highest security requirements, including compliance.	Yes	<p>Student First Technologies is diligent about platform security protocols. The team performs a weekly assessment of security, backup, and restore procedures to ensure our systems and code (versions, libraries, and tools) are up-to-date and secure.</p> <p>The Technology section below more deeply explains our approach to security, including certifications.</p>
4.3.1.1 If Respondent evaluates their organization and produce a System and Organization Controls 1 (SOC-1) and System and Organization Controls 2 (SOC-2) report or similar, the Respondent shall provide this	Yes	<p>Student First Technologies does not currently evaluate our organization with a System and Organization Controls audit but will produce a SOC-1 audit for the period ending March 31, 2023, when available.</p>

annually to the State of Iowa.		
4.3.1.2 The Respondent shall immediately report within five (5) business days to the Department of Education any use or disclosure of Confidential Information not provided for by this Contract, of which it becomes aware. Respondent shall cooperate with the State of Iowa's investigation, analysis, notification and mitigation activities, and shall be responsible for all costs incurred by the Department of Education for those activities.	Yes	<p>Because all sensitive client information (student identifiers, SSNs, etc.) is securely encrypted using a robust encryption algorithm, in the event of a database breach, sensitive fields are obfuscated and unreadable to an attacker.</p> <p>Student First will immediately report any such breach and fully cooperate with all resulting investigations and related mitigations and costs.</p>
4.3.1.3 Ensure that Respondent or its employees and subcontractors will not reuse, sell, make available, or make use in any format the data researched or compiled for this Contract for any venture, profitable or not, outside this Contract.	Yes	Neither Student First, as Respondent, nor our employees or contractors will in any way leverage the data for this contract for any venture outside of this contract.
4.3.1.4 The Respondent shall encrypt all data at rest and in transit at minimum at 256 AES.	Yes	All sensitive data is encrypted at rest using at least a 256-bit Advanced Encryption Standard and transmitted securely via Secure Sockets Layer (SSL) encryption.
4.3.1.5 Storage of data at rest shall be located solely in data centers in the continental United States.	Yes	All data is stored at rest in Amazon Web Services (AWS) data centers located in Virginia, USA, with redundant backups that may exist in Ohio and elsewhere in the continental United States per Student First's discretion.
4.3.2 Must offer the Department of	Yes	The <i>Theodore</i> platform supports automated



<p>Education the capability of automated clearinghouse transactions, electronic commerce transactions, reimbursement transactions, and debit card payments in order to meet the diverse needs of participating parents and guardians to pay for qualified educational expenses.</p>		<p>clearinghouse transactions, electronic commerce transactions, and reimbursement transactions.</p> <p>We do not offer debit card transactions at this time.</p>
4.3.3 Application system must:		
<p>4.3.3.1 Allow for secure transmission of applications, to include any required supporting documents, such as tax returns, applicable nontaxable income documents, and documents verifying school enrollment.</p>	<p>Yes</p>	<p>Student First Technologies custom configures secure, custom applications based on program requirements and administrator preferences.</p> <p>To verify program eligibility or income status, files can be securely uploaded to the application, even on mobile devices.</p> <p>We support schools in verifying student enrollment and adjusting student rosters, tuition, and fees through their portal.</p>
<p>4.3.3.2 Have the ability for applicants to input personal information for multiple students in household on same application.</p>	<p>Yes</p>	<p><i>Theodore's</i> application feature allows for multiple applications to be submitted under a single family account, with the functionality to pull over any necessary information between sibling applications.</p> <p>This efficiency works year-to-year for students needing to reapply so that previous information is prefilled to speed up the process.</p>
<p>4.3.3.3 Provide review based on income data inputted by the applicant and identify any need for additional document submissions from the</p>	<p>Yes</p>	<p>Student First Technologies' and program administrators can review applications and request additional information and documentation from families as needed.</p>



applicants.		
4.3.3.4 Compare Applicant reported income to income thresholds defined by the Client to determine whether Applicant meets Client's eligibility requirements.	Yes	Income guidelines are configured inside the <i>Theodore</i> platform to make the analysis of student eligibility straight-forward for program administrators.
4.3.3.5 Allow electronic verification and acknowledgment by the Applicant of required assurances and rules.	Yes	After approval, and before full account access, families must consent to the appropriate use of funds and any other program specifications.
4.3.3.6 Allow Applicant to start and stop an application mid-stream and save information to be able to resume later.	Yes	Families can begin their applications and save them to return and complete later. Administrators can filter to see applications that have not been completed if they wish to engage families for higher rates of completion and submission.
4.3.3.7 Provide status of application within application reporting. This may include: Submitted, Documents in Process, Does Not File, and Verified.	Yes	Student First will configure custom statuses based on program administrator needs. These statuses can be used to filter results by administrators for additional action or ad hoc reporting.
4.3.3.8 Allow a Client administrator to view application data, including reporting fields related to eligibility criteria.	Yes	Administrators can view applications, assess additional needs for verifications, and specify actions that need to be performed by applicants.
4.3.3.9 Generate an acceptance or denial email to Applicants.	Yes	Student First will configure custom auto-responses to be delivered to families upon application review and confirmation of a family's eligibility or ineligibility.
4.3.3.10 Bundle siblings into the same Applicant user account.	Yes	Families will have a single sign-on from which they can see each child's digital wallet and

		transactions.
4.3.3.11 Provide a two-week document processing turn-around once all required documentation is received from applicant(s).	Yes	Student First Technologies can meet the two-week document processing expectation for files loaded directly into the <i>Theodore</i> platform.
4.3.3.12 Provide Client access to perform student level eligible school verification and existing ESA program participation status.	Yes	Program Administrators will have full access to perform verification tasks and adjust applicant statuses as needed.

Implementation Requirement

4.4 Upon award of a Contract for services the Agency shall negotiate an implementation schedule with the successful Respondent.	Yes	As outlined in the Implementation Plan below, Student First is prepared to negotiate all completion dates and deliverables in partnership with IA DOE to best serve the goals of the program and Iowa families.
--	-----	---

Software Platform Details

Student First Technologies is honored by the potential opportunity to provide all labor, services, and resources to create a software platform service that meets all IA DOE criteria for the Education Savings Account as created by House File 68. The proposed service will provide a fully customizable online application, payment processing, standard and ad hoc reporting applications, and customer services for program administrators, schools, and families. As the creator of the proposed managed service solution, Student First will also provide agile, responsive, and efficient administration, training, and ongoing support for program users and IA DOE personnel.

Using the proprietary cloud-based application, *Theodore*, Student First will create and maintain an IA DOE-specific managed service solution for use by applicants, awardees, program administrators, schools, and providers. As an end-to-end education finance and provider marketplace platform,

Theodore can be configured to meet IA DOE needs while also providing robust management and comprehensive reporting capabilities with secure firewalls and safeguards around all users and program data. Furthermore, since we prioritize our clients' promotion of their impactful education programs – the *Theodore* platform can be completely co-branded so it is abundantly clear that families and providers are interacting with a state-led program.

Theodore offers all users an easy-to-use interface for secure user interactions and a robust provider marketplace with service scheduling, and item or service level pre-approvals, combined with easy-to-use applications for families and providers, application review, payment processing, and comprehensive reporting capabilities.

The *Theodore* platform can be configured to leverage existing state data to streamline the confirmation of student and family program eligibility. Using existing data, the *Theodore* platform can cross-reference existing state databases to expedite the approval of families and students. In the absence of existing data, users can add supplemental documentation to their application to provide additional context for eligibility review.

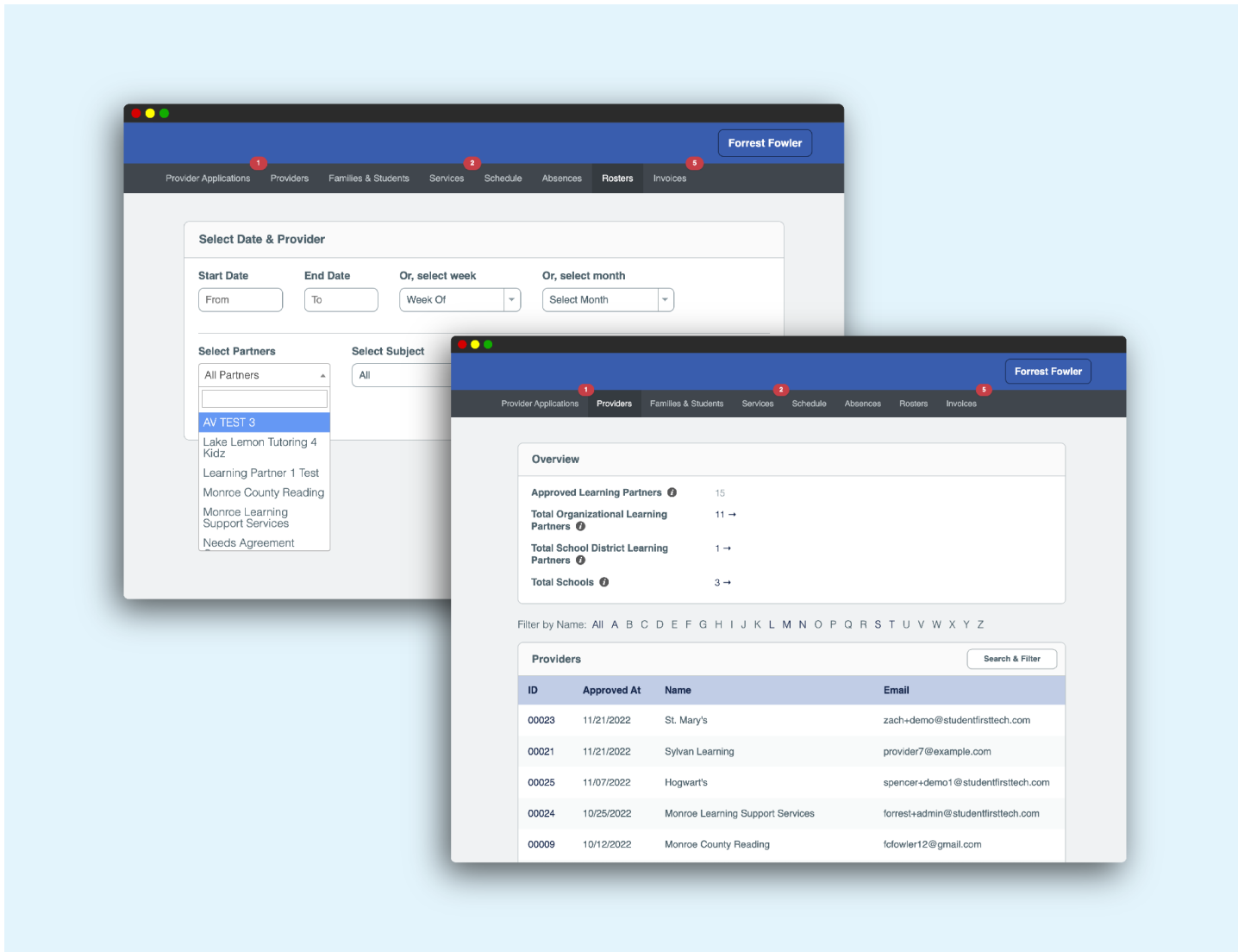
To prevent the misuse of funds, all products & services must be pre-approved by administrators and the purchase of these products is only available through the *Theodore* platform. This eliminates the potential for fraudulent purchases that may occur outside the platform.



Administrator Portal

The *Theodore* platform offers a robust system for administrators to qualify families, schools, and providers for program eligibility through discreet application processes detailed below. Administrators can manage all financial elements of the program management in the portal as well, including pre-approving services and expenses, reviewing fee requests from schools, and reviewing and paying invoices as needed. Program administrators can choose between integrating the platform with third-party accounting systems for traditional check disbursements or setting up ACH processes as outlined in the Approach to Accountability section. Administrators also have customized data and reporting opportunities as outlined below and in greater detail in the Reporting section.

To the right and below, screenshots demonstrate administrator portal views in *Theodore*. These views can be customized to meet IA DOE needs and reporting requirements.



Eligibility Data

Student First configures student applications based on program requirements and administrator preferences. To verify program eligibility or income status, files (including screenshots, PDFs, and sensitive documents) can be securely uploaded alongside the application.

Our goal is to provide program administrators with the tools for strong due diligence, while lowering the bar for entry for families when possible. We, therefore, highly value data-sharing collaboration



to verify family program eligibility when state systems and policy permit this approach, and we can accomplish this through manual data file uploads or automated Application Programming Interface (API) requests. This strategy allows eligible families who already receive other state benefits to enter their student's identifying information and then simply activate their account instead of submitting a full application for processing and review. Data sharing collaboration can be leveraged to verify state of birth, income, and supplemental income, to name a few. This allows for greater efficiency for both family application completion and submissions that are pre-certified previous to administrator review. While it is useful to collaborate for high-quality data across state agencies, our security protocols typically prioritize the administering agency as the sole state account holder.

Data & Reporting

We know that strong data empowers administrators and supports the case that education funding programs have an immense impact on families and on student outcomes, and we are committed to partnering to build this strategy. We will configure the *Theodore* platform to provide IA DOE with comprehensive reporting capabilities with secure firewalls and insurance around all users and program data.

To ensure that program administrators can monitor trends in real-time, the dashboard provides reports—on an ongoing basis—on student and family accounts, approved schools, total tuition and service expenses, total invoices received, and disbursements waiting for approval, to name a few.

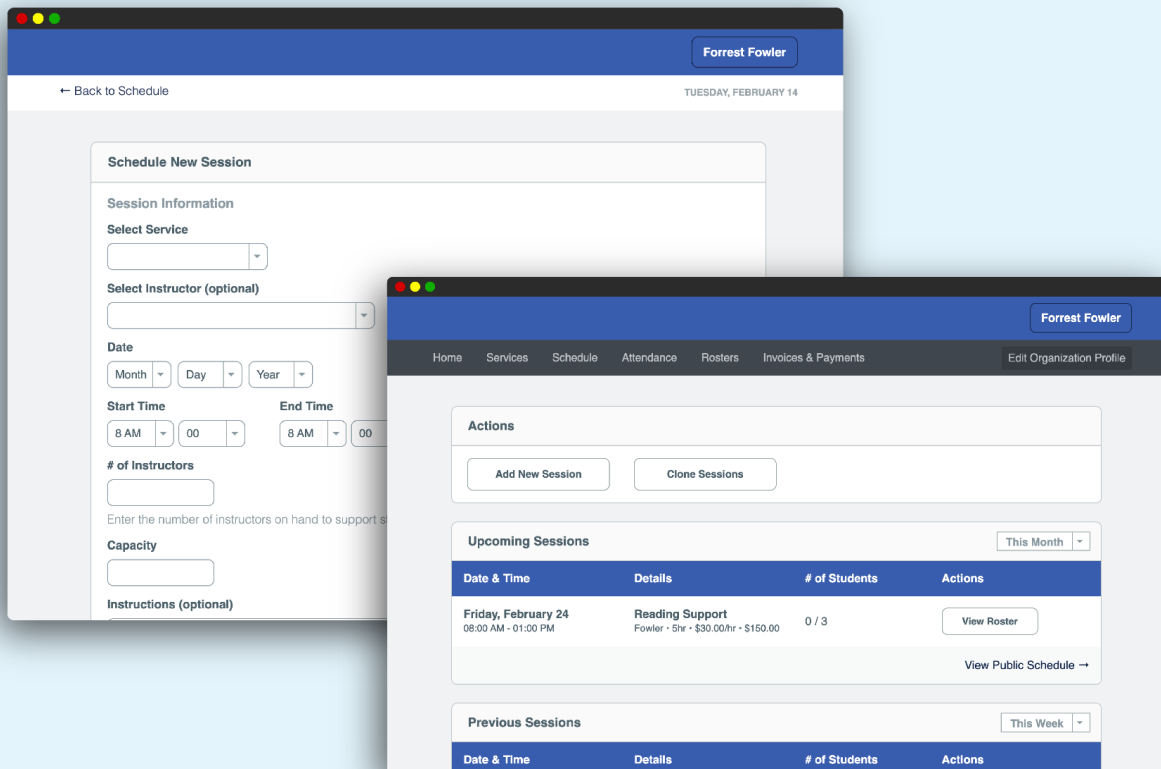
Tuition & Services Expenses Management

In our experience, monthly disbursements support schools in their best faith efforts and establish the program as a trusted partner supporting schools who are reliant on this funding for their operations, and reduces the opportunity for overpayment. While monthly payment processes can produce administrative lift in theory, school-level logins, and enrollment verification within the platform, produce audit trails and due-diligence processes that lower the lift for all users.

Participating schools will submit their annual tuition and fees upon activation of their account and will certify student enrollment monthly or quarterly, depending on program requirements. Administrators can choose to auto-approve monthly invoices for tuition and fee disbursements that have not changed and have already been approved, or they can manually approve each payment

period. New school-level fees can be submitted for administrator approval for a school's full enrollment portfolio or for individual students, depending on the need.

Expense reimbursement requests can be reviewed individually, as well as by entire product or service categories that can be pre-approved for immediate payment eligibility. Any request outside of the pre-approved categories would trigger administrator action and approval, resulting in an invoice or rejection. Additionally, Student First's unique capacity to support families through our in-system provider portal, allows approved providers to upload available approved services and sessions, and for families to schedule without leaving their ESA account. This limits the opportunity for falsification of services or attendance by vendors and renders the misuse of funds on unallowable expenses unlikely while lowering the lift for families, all within one cohesive system.





Schools and Provider Map and Marketplace

Theodore provides approved schools an easy location to certify and adjust student enrollment rosters and dates and submit education fees for program approval, and monthly or quarterly invoices for tuition and fees disbursement.

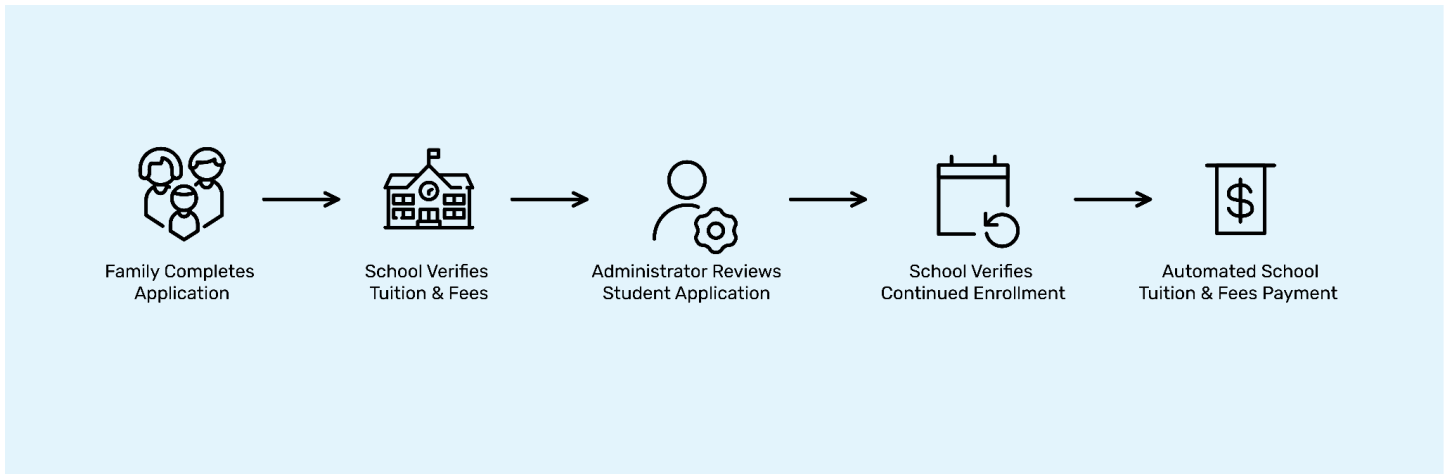
In Arkansas, the modernization of school enrollment assertion, invoicing, and tuition payment processing decreased school administrators' monthly lift from approximately five hours a month per 100 students, to one hour a month, per 100 students.

Approved education providers have complete access to their service and account history, pending expenses, payment statuses, and critical information related to program rules and requirements. Providers can submit products and services for approval by program administrators, and then integrate them into their own accounting processes, or generate invoices directly inside the system. Furthermore, the ability for providers to bulk upload receipts or attendance verification

within the system creates needed accounting efficiencies and reduces the lift on all users.

Student First supports administrators in customizing the schools and education provider approval processes. For example, in Indiana, we facilitated a system build that included a rigorous provider application review—augmented by a Review Committee made up of education leaders from across the state—before specific service level approval to ensure quality service delivery to students and to bar fraudulent actors. You can read more about this in Appendix A.

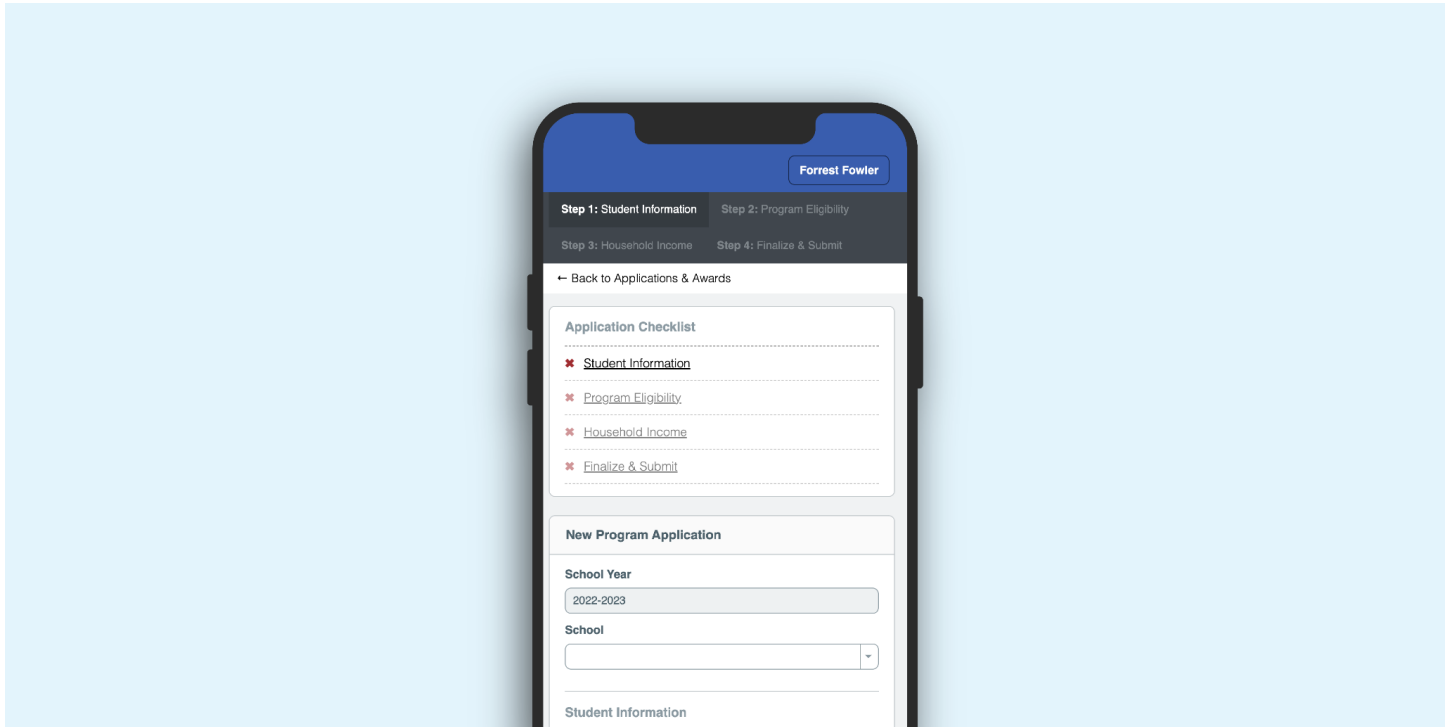
School User Flow



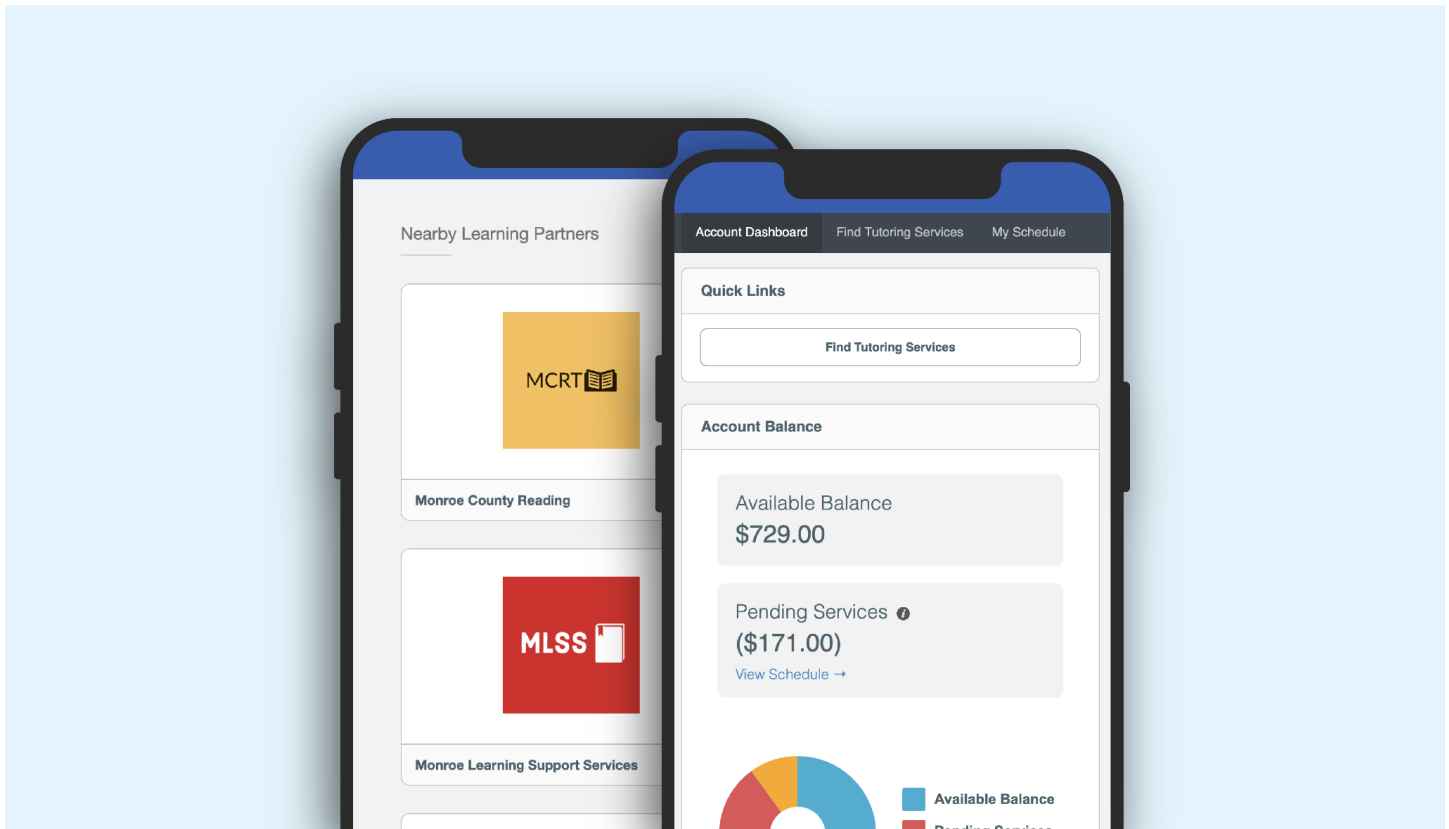
Family Portal: Application and Digital Wallet

Through a mobile-friendly and fully customizable application process, families can easily apply for participation and income verification for the ESA program. To verify program eligibility or income status, files can be securely uploaded to the application. The application is mobile-friendly, and families can complete it—including the upload of required documents—directly from their mobile devices. As stated above, we are eager to partner with state agencies for efficient use of existing data to simplify the application process where possible for both families and administrators.

Once an application is submitted, it is updated immediately to reflect any status changes from administrators, allowing families to see the real-time status of their application inside their portal and to receive updates from administrators on additional needs for program qualification and enrollment. Families are able to save their application and return to complete it later or to add additional documentation. Administrators are able to apply search filters to see applications that have been started but not submitted if they wish to engage families to increase successful completion. Student First's application feature allows for multiple applications to be submitted under a single family account, with functionality to pull over any necessary information between sibling applications.

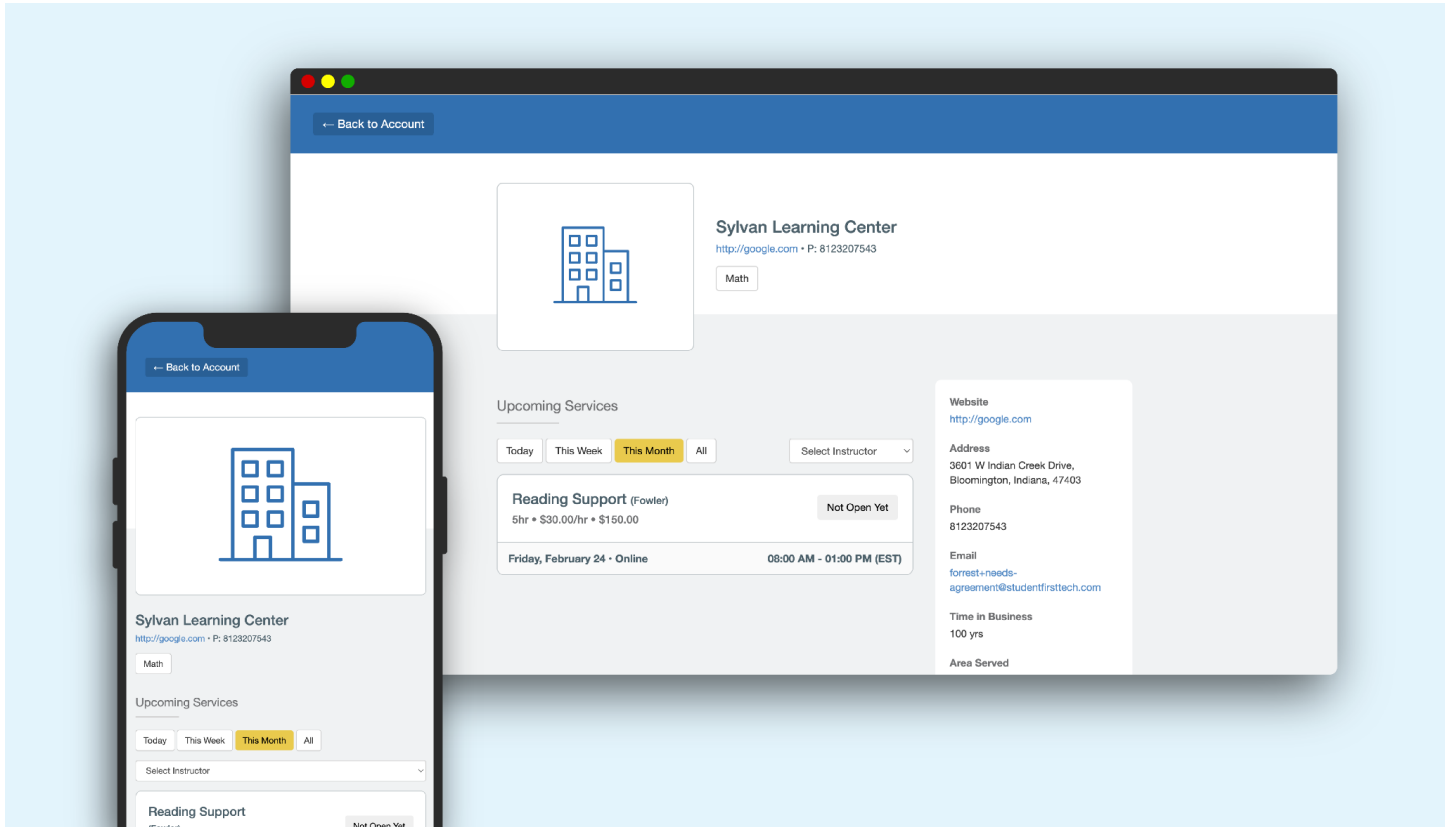


Once approved for participation by administrators, families add a password to create their user account. They will then see their funded digital wallet and have complete, mobile-friendly access to their account at all times, including a balance summary and complete breakdown of their historical expenses. If the program design permits, Student First can customize the system to allow families to add funds to their digital wallet. In this case, families that have added funds would be able to leverage those once their programmatic funds were depleted. When reapplying in subsequent years, families can simply update personal information and required verification without needing to resubmit repetitive information.



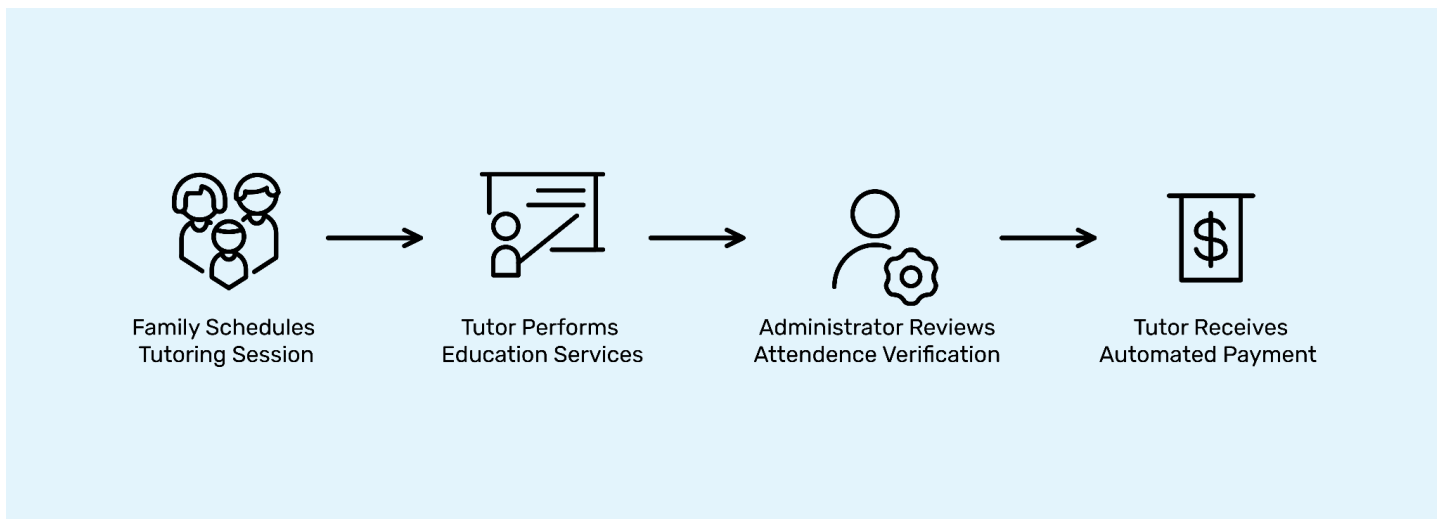
In the spirit of the 2026 program expansion to universal eligibility, if desired, Student First is prepared to support IA DOE in creating family accounts for currently ineligible students, that would allow families to fund their own digital wallet, and leverage the marketplace of high-quality services and products, including in-system scheduling access.

Depending on program priorities, families can be prompted to take action in the portal to browse education providers and services or the list of approved schools. Upon entering the marketplace, families can narrow their searches using filters for school, service type, address, or grade level. Once they select a school or provider, they can view their service offerings and available sessions and even schedule within the platform. Optimized for busy parents on the go using a mobile device, the Theodore provider map is a rigorous interactive tool featuring approved schools and eligible education providers, their hours, services provided, and contact information.



Because families can schedule education services within the platform, an invoice—with the provider’s information, service specifications, and verification of student session attendance—is automatically generated after each session. Providers must include attendance verification for service sessions or receipts for other approved expenses. Administration can either auto-approve invoices for pre-approved services or receive alerts to review each provider invoice.

Family User Flow



Technology

Insurance

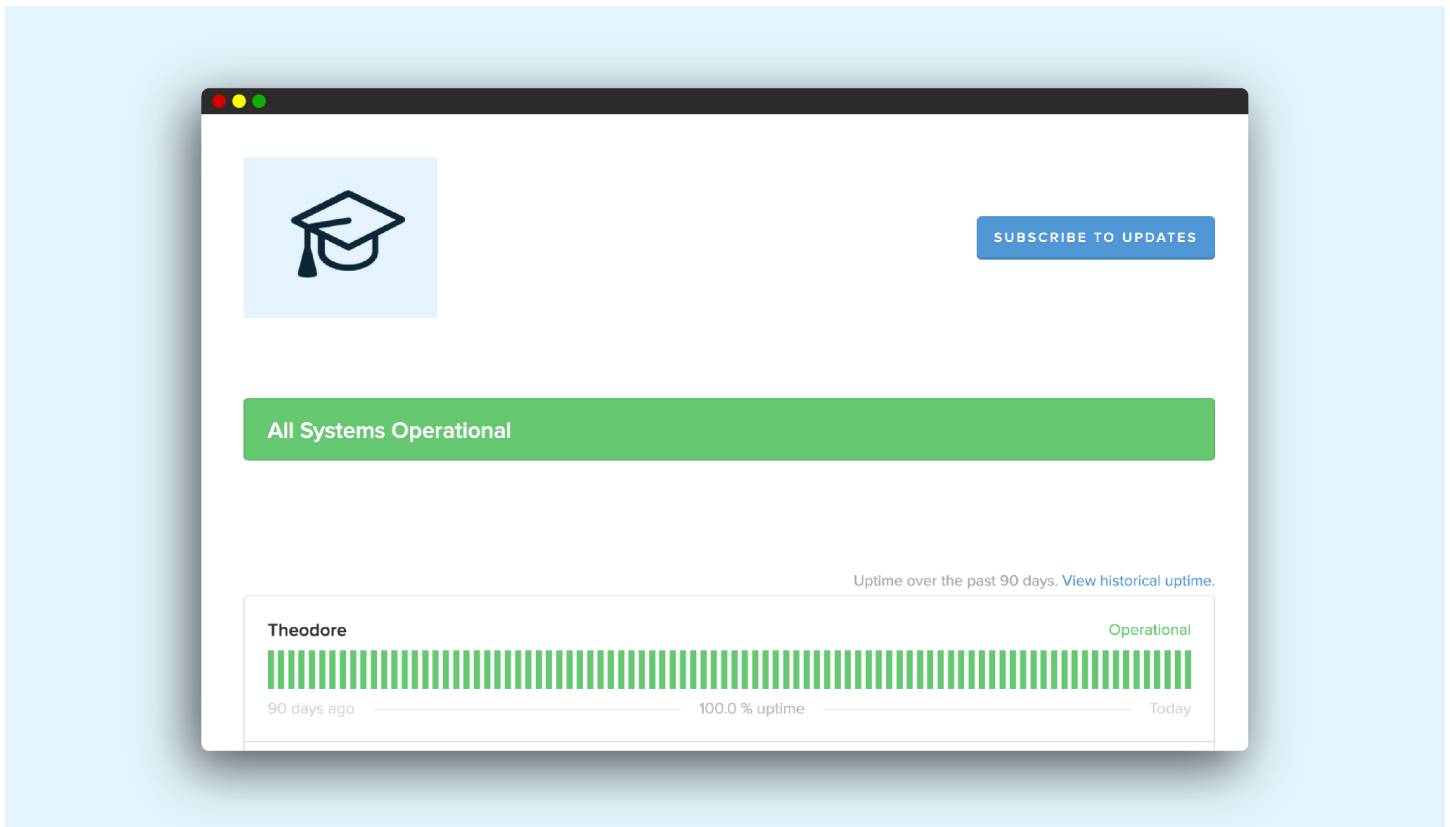
Student First Technologies holds an “insurance + cyber” policy with Embroker Insurance Services LLC. A certificate of liability insurance is included on the next page. Upon award, Student First Technologies will automatically audit and match its insurance policy to IA DOE requirements.

System Access and Architecture

All user portals in the *Theodore* platform are accessible from any Internet-enabled device including but not limited to, desktop computers and any brand of consumer “smartphone” that includes a mobile browser such as Safari, Google Chrome, Firefox, or Microsoft Edge. Parent and service provider portals are optimized for use on mobile devices including smartphones while administrator portal access is best displayed on a desktop device.

The *Theodore* platform maintains a historical 99.999% uptime availability, and can be updated at scheduled, planned maintenance windows whenever needed. Additionally, with our portal segmentation for each user, the system can also be updated at any time directly without affecting the delivery of a user's current session. We utilize a user acceptance testing (UAT) instance for all builds where testing and quality assurance (QA) can be completed before going live to all active

users. This UAT environment acts as a clone of the system for all settings and configurations, without user data being included. This means that during testing we are not modifying or manipulating live accounts and without accessing personal identifying information that the live system contains.

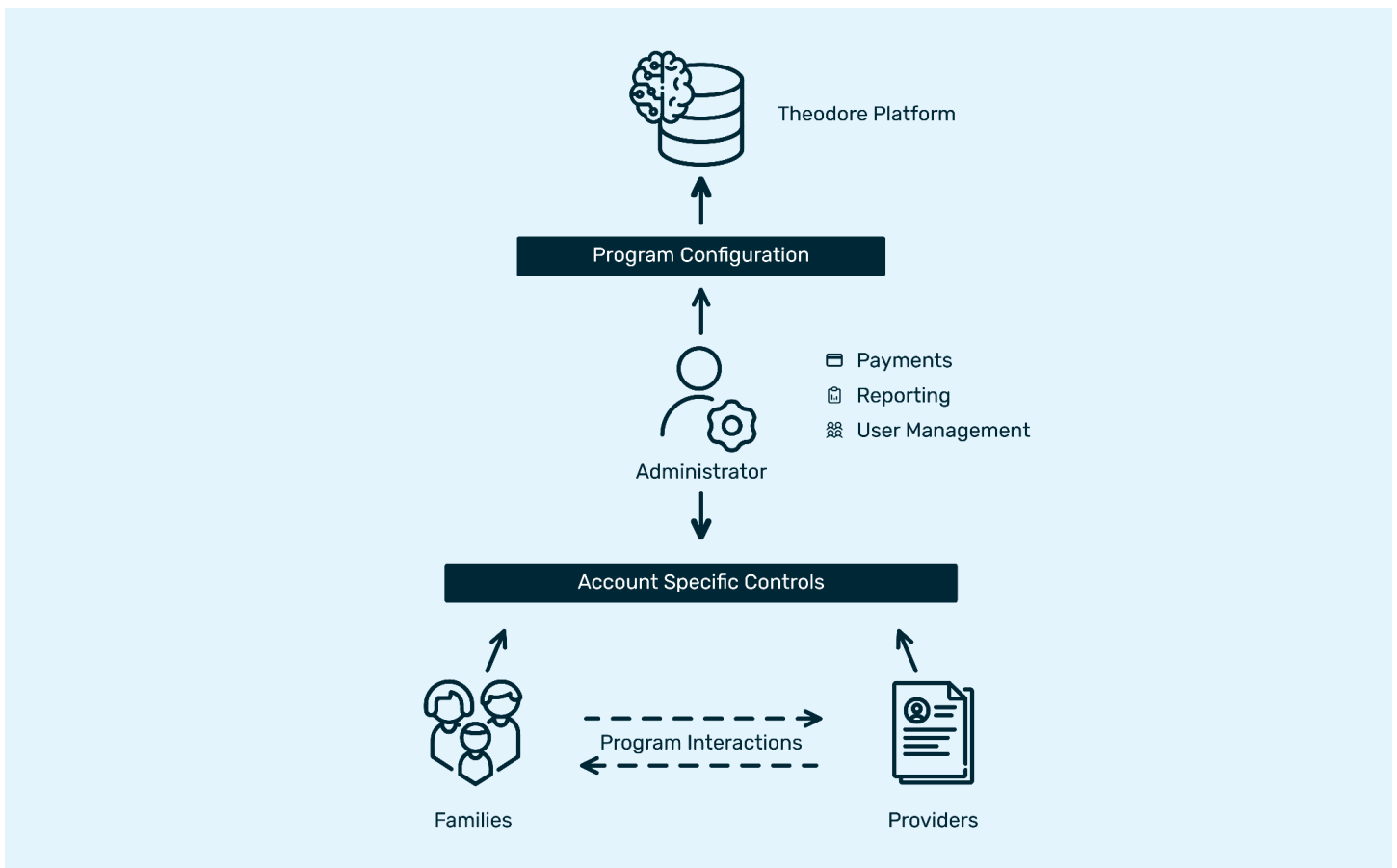


Theodore offers the following performance capacity:

- The proposed service solution has the capacity to serve an unlimited number of users. Currently, Student First uses *Theodore* to administer over \$100 million annually in 15 states. For IA DOE, *Theodore* is ready to serve all possible eligible students for the ESA program. *Theodore* is tested, and proven and can readily handle the anticipated transaction volume and simultaneous user access.

- An end-to-end education finance and provider marketplace platform, *Theodore* can be configured to meet IA DOE’s needs while also providing robust management and reporting capabilities backed up with secure firewalls and insurance around all users and program data.
- The *Theodore* platform is a multi-tenant “portal”-based system designed to support all anticipated end users of IA DOE’s ESA program.

Theodore offers unlimited user accounts for families, schools, and providers. This includes digital wallets, school and provider searching in an unlimited marketplace, scheduling tools, and a robust administrative dashboard with unlimited logins, permission settings, and reporting features.



Further, the *Theodore* platform is compliant with all state and federal requirements relating to accessibility. Our accessibility features include:

- Via an ongoing partnership with accessiBe, and ongoing audits with real-time support, the *Theodore* platform is compliant with all federal and state accessibility standards.
- Leveraging accessiBe’s infrastructure and tools for monitoring compliance with accessibility standards allows Student First Technologies to focus on delivering the best-in-class educational funding platform while meeting the following standards:
 - Web Content Accessibility Guidelines (WCAG)
 - The Americans with Disabilities Act (ADA) Website Compliance Standards
- While the majority of IA DOE students speak English, Spanish is the second most populous language. In a landscape where companies relying on Google Translate to translate web services deliver inconsistent quality and meaning, Student First proudly partners with native speakers to perform a full true translation of all platform elements.

Data Safety, Availability, and Controls

All data in the *Theodore* platform is backed up via 24/7 rolling backups which maintain a complete snapshot of system data at any point in the last 7 days. Security audits are performed weekly and all internal systems and data are secured with Two Factor Authentication (2FA). All internal systems are IP restricted and only available to on-site employees & contractors. Documents are encrypted and stored in a high-availability siloed document store, with access restricted using links that expire after 15 seconds and must be re-authenticated by authorized users.

Student First Technologies maintains an active data security and compliance partnership with Cloudflare, a global company serving 17% of the Fortune 500, and offers “a global network designed to make everything you connect to the Internet secure, private, fast, and reliable”. Leveraging Cloudflare’s expertise allows Student First to stay at the cutting edge of industry standards. Additionally, we maintain an active cyber-liability insurance policy including “ransomware” coverage, and are committed to pursuing financial or contractual remedies in the event of a data breach resulting from our negligence.

All data inside the system is configured with search capability and filters based on required fields. This allows program administrators to easily refine the data they view to meet their ad hoc reporting



needs. Program administrators can export any data in the system to CSV/Excel for additional analysis and reporting. This could, for example, include insight into savings account usage, private and homeschool invoicing statuses and totals, available services and service types, and zip codes with the most and least ESA utilization.

Upon request, Student First will provide a backup (export) of the program's data within thirty (30) days of the request. Student First knows that data backup is critical, and partners with Heroku (a Salesforce company) to perform rolling backups.

To comply with the Family Educational Rights and Privacy Act (FERPA), our systems implement best practices around student data. Although we do not solicit any information from students under the age of 13 directly, we do implement best practices to comply with the Children's Online Privacy Protection Rule (COPPA) as outlined by the Federal Trade Commission (FTC).

Platform Security and Accessibility

Student First maintains a partnership with [Modern Treasury](#), a financial services company serving hundreds of integrated payment-flow customers. Modern Treasury's robust systems for compliance, fraud detection and prevention, and a multitude of secure, encrypted payment options allow Student First to focus on delivering a "best-in-class" educational experience for families, providers, and administrators while leveraging the resources of Modern Treasury's expansive operation for payment processing and compliance. Student First Technologies maintains no sensitive payment information on its own servers. All payment information is encrypted inside the Modern Treasury ecosystem and securely accessible only for the explicit payment functions allowed by its partners and their eligible providers and families.

Student First Technologies is diligent about system security protocols. The team performs a weekly assessment of security, backup, and restore procedures to ensure our systems and code (versions, libraries, and tools) are up-to-date and secure. Further, we prioritize the following industry security best practices.

Industry standard password encryption: Student First uses industry-standard hashing and salting of user passwords to prevent unauthorized access.



Industry standard sensitive data encryption: All sensitive user information (SSNs, etc.) is securely encrypted using OpenSSL and a robust encryption algorithm. In the event of a database breach, sensitive fields are obfuscated and unreadable to an attacker.

Session duration limiting: All user sessions in the Student First platform are limited to four hours, after which users are required to re-authenticate their accounts. This prevents unattended sessions from being accessed by unauthorized users.

Secure offsite backups: All data in the Student First system is backed up offsite, on a rolling basis via Heroku's PostgreSQL Continuous Backup Systems.

Third-party financial processing: Student First utilizes established third-party vendors (Modern Treasury, WePay, et. al.), to generate tokens for payment processing and funds management. We do not see or store account information, card numbers, expiration dates, or CVV codes. Instead, we rely on third-party vendors to secure and manage payment compliance. All partners are Level 1 PCI Compliant Service Providers.

Platform as a Service (PaaS): For infrastructure management and deployments, we utilize Heroku, a third-party vendor owned by Salesforce. (Heroku's security practices are outlined at <https://www.heroku.com/policy/security>.) As a customer of Heroku, our systems benefit from the policies and infrastructure management they provide.

FERPA/COPPA compliance: To comply with the Family Educational Rights and Privacy Act (FERPA), our systems implement best practices around student data. Although we do not solicit any information from students under the age of 13 directly, we also implement best practices to comply with the Children's Online Privacy Protection Rule (COPPA) as outlined by the Federal Trade Commission (FTC).

Approach to Accountability

Through the *Theodore* platform, will create, maintain, and operate – on behalf of the State of Iowa – a fiscal management and payment system for use by families, schools, vendors, and program administrators. Eligible families can only spend awarded funds as tuition and fees to approved schools, and with providers that are approved according to IA DOE's program standards. We outline this business process below. If desired, we can also customize the platform to allow families to add

funds to their own digital wallets, increasing the overall services and products they are able to access.

Terms of service for families are included in the account management workflow, requiring families to consent to appropriate spending and documentation before accessing their accounts.

Fiscal Management and Payment

Through the *Theodore* platform, Student First will create, maintain, and operate – on behalf of the State of Iowa – a fiscal management and payment system for use by families, schools, vendors, and program administrators. Eligible families can only spend awarded funds as tuition and fees to approved schools, and with providers that are approved according to IA DOE’s program standards. We outline this business process below. If desired, Student First can also customize the platform to allow families to add funds to their own digital wallets, increasing the overall services and products they are able to access.

If a family is approved, the Theodore system loads a digital wallet in the family’s account with the balance of approved funds allocated to the family.

Payments can then be submitted to pay for tuition and fees at a student’s school or requested as reimbursement from families for approved providers.

If an administrator approves a submitted expense, the payment flows through a disbursement mechanism for provider payment.

Theodore connects with any existing bank through the use of NACHA file generation for the automation of ACH payments to providers.

Terms of service for families are included in the account management workflow, requiring families to consent to appropriate spending and documentation before accessing their accounts.

Funds Distribution

Program administrators can choose between two fund distribution strategies, both of which have been executed by education funding programs in other states.

ACH or Wire Transfer: This option requires schools and providers to enter their bank credentials into their secured user account. Once an invoice or reimbursement request has been approved, an administrator can trigger an automated disbursement. This is tracked in both the school/provider account, in the corresponding family wallet, and creates an administrative system record for reporting.

Checks: Administrators can integrate third party accounting systems with the administrator portal, and upon approving an invoice or reimbursement request, can trigger a disbursement. This is tracked on both the school or provider account, in the corresponding family wallet, and creates an administrative system record for reporting.

Security

Student First maintains a partnership with Modern Treasury, a financial services company serving hundreds of integrated payment-flow customers. Modern Treasury's robust systems for compliance, fraud detection and prevention, and a multitude of secure, encrypted payment options allow Student First to focus on delivering a "best-in-class" educational experience for families, providers, and administrators while leveraging the resources of Modern Treasury's expansive operation for payment processing and compliance. Student First Technologies maintains no sensitive payment information on its own servers. All payment information is encrypted inside the Modern Treasury ecosystem and securely accessible only for the explicit payment functions allowed by its partners and their eligible providers and families.

We build system protocols and financial controls with program administrators to eliminate as much possible risk for fraud and misuse as possible. Upon launching an approved account, families must accept the terms of service, consenting to spend funds appropriately. In the case of suspected fund misuse or fraud, Student First can at any time freeze user accounts, rendering scheduling and purchases temporarily infeasible as the investigation is conducted.



Student First Technologies maintains no sensitive payment information on its own servers. All payment information is encrypted inside the Modern Treasury ecosystem and securely accessible only for the explicit payment functions allowed by its partners and their providers. We rely exclusively on third-party vendors to secure and manage payment compliance. All partners are Level 1 PCI Compliant Service Providers.

Reporting

Student First Technologies has extensive experience supporting state and non-profit clients with their data strategy and reporting needs, and is the only education funding provider that can provide this service at the level and scope that we do. We know that strong data support the case that these programs have an immense impact on families and on student outcomes, and we are committed to being a strong partner in the design and execution of this strategy. Therefore, we will configure the *Theodore* platform to provide IA DOE with comprehensive reporting capabilities backed up with secure firewalls and insurance around all users and program data.

We require that administrators have accounts and sign into the platform, in order to create robust audit trails and to ensure that administrators can access ad hoc reporting mechanisms through filtering and export capabilities. This empowers administrators to monitor trends in real-time, and to interact with the dashboard's reports on student and family accounts, approved schools, total tuition and service expenses, total invoices received, and disbursements waiting for approval, to name a few.

All data inside the system is configured with search capability and filters based on required fields. This allows program administrators to easily refine the data they view to meet their ad hoc reporting needs. Program administrators can export any data in the system to CSV/Excel for additional analysis and reporting. This could, for example, include insight into savings account usage, private and homeschool invoicing statuses and totals, available services and service types, and zip codes with the most and least ESA utilization.

Theodore's reporting system is entirely customizable. Clients have leveraged its capacity for the following reporting needs, to name only a few:

- To disaggregate account information by student, by assigned school, and by assigned district.

We partner with every client to build strong data and reporting strategies to meet their goals.

Whether the strategic focus is on financial oversight, program impact, or closing gaps between subgroups, we're excited to design an appropriate plan.



- To gain insight into global student account activation and active use, including at subgroup levels.
- To assess types of services and products most in demand from families, and provider capacity to meet the expected need.
- To report on the number of funds disbursed to schools and providers, and to analyze this against monthly and annual targets, as well as against zip codes with the highest levels of need.
- To present a year-over-year picture of the program’s impact on student academic outcomes compared to similar students not leveraging the program.

A strong strategy for data and reporting is a powerful tool to support IA DOE in leveraging its full programmatic potential, and Student First Technologies looks forward to designing a customized solution together.

Customer Service

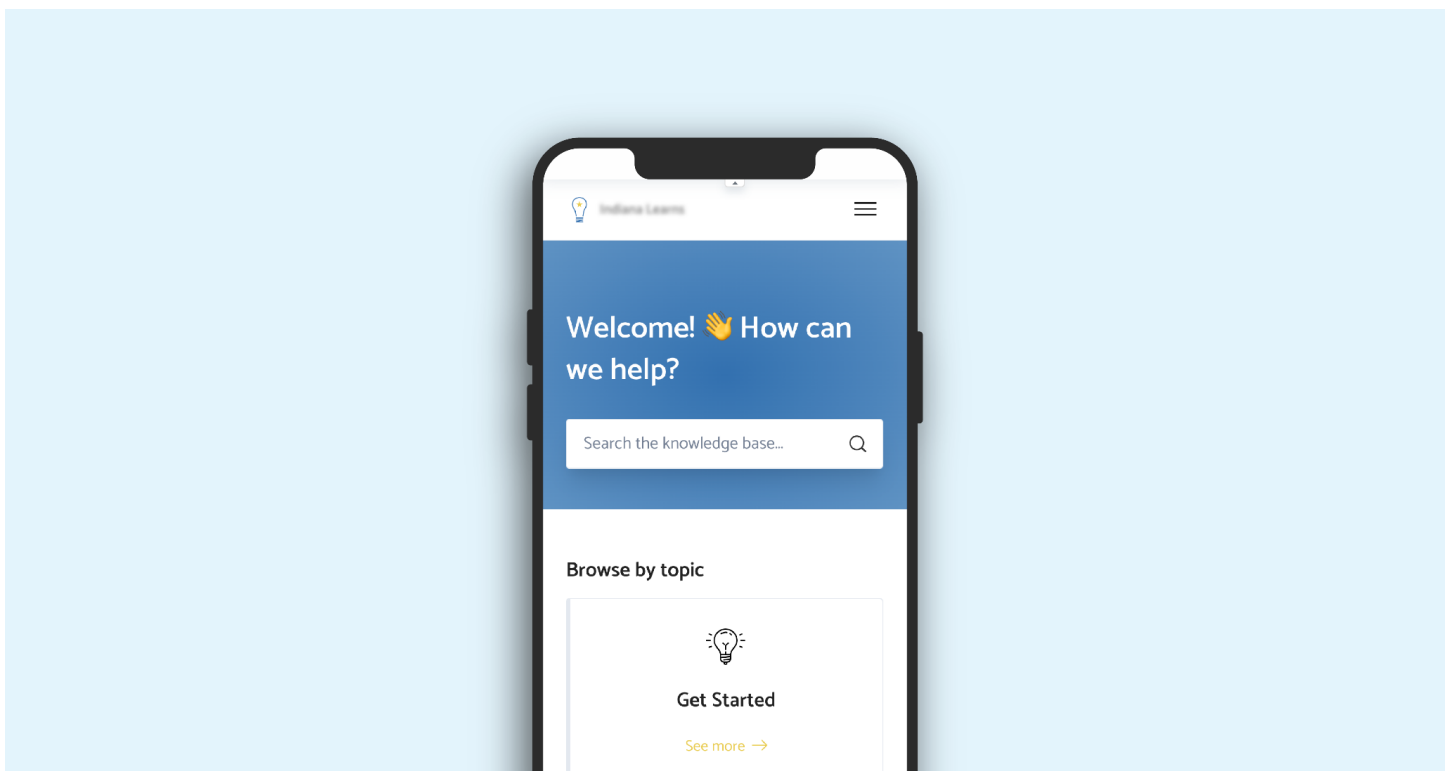
Program Administrator Support

IA DOE program administrators will receive direct access to Student First’s CTO and CEO during the contract life of this project. Our team partners closely with program administrators to address needs as they arise, but also to serve as thought partners for a scalable and sustainable program design based on our experience in diverse education funding landscapes. Your project team will also include a product owner, a project manager, and a project coordinator to directly support all day-to-day work, keep deliverables on target and keep communication channels transparent and efficient.

Helpdesk Support

Families, schools, and providers will utilize an integrated support system throughout the platform via a fully integrated help desk support “widget”. Additionally, users can email the support-specific email built for this program that will interface with users requesting support. These email communications will be logged as helpdesk tickets to keep communication and reporting streamlined. Phone customer support will be available by U.S.-based support staff during all business hours.

Incoming tickets are categorized and sorted so that all user and request types can be answered and logged in a timely manner by the individual that can best support their request. A user at any time can also reference the program-branded help center to read help articles and watch step-by-step videos. By providing this content, we are empowering users to get answers to their questions as quickly as possible. The entry point of the help desk is a search box that queries all written content within the help articles, actively directing families to the most relevant content as they type their requests.



Upon contract award, discussion with IA DOE will determine the preferred communication formats desired, which can include phone, email, online chat, and direct shared screen video. Program users will be provided with customer service options that include standard business day coverage for application functionality assistance and after-business hours and weekends for financial management and payment assistance.

Support Design

Student First has significant experience supporting clients with the customer service experience of our technical platforms, including any challenges that arise with account management, password resets, scheduling services, invoicing, or submission of receipts or enrollment verification documentation. Further, we are well-positioned to support IA DOE in programmatic-related questions for the ESA if desired, including supporting families through the application and eligibility verification process and supporting providers in understanding the quality expectations and approval process.

During the implementation phase, we will design workflows for each customer service question type, in order to best collaborate with IA DOE to align on the process for addressing requests, the protocol for escalating a request, and how new questions are documented in FAQs and other support content. We foresee three likely scenarios for partnership on customer service customization and are happy to design a scenario that best leverages IA DOE and Student First to the benefit of all users:

- Student First customizes a program helpdesk for IA DOE program administrators to leverage, with Student First automatically addressing all technical requests, including account management, financial management, and payment assistance.
- Student First designs a customized helpdesk and addresses all requests, including program-related requests from schools, families, and providers, as well as technical requests.
- IA DOE leverages its agency ticketing system, sharing technical tickets with Student First for a response.

Our customized helpdesk leverages tools to monitor every incoming system error to control for any issues not caused by users. Any system error that blocks family access to funds creates an instant tier 1 support ticket and is handled immediately. Upon a user requesting support, the resulting ticket is reviewed by the Student First team and if it results from a system error, a priority level is assigned before it is assigned to the appropriate team for resolution.

Client Support Portfolio

Student First leverages the [Zendesk](#) customer support platform to create custom, program-specific helpdesk and user flows that seamlessly match the family and provider platform experiences. Leveraging Zendesk’s robust client support and reporting capabilities allows the Student First team to deliver a best-in-class experience for families and educators – ensuring their questions are answered in a straightforward and timely manner.

The *Theodore* platform also implements “soft deletes” for all database records, such that data can be recovered nearly immediately if an unintentional deletion occurs inside the platform.

The entire platform is continuously monitored by [New Relic](#), an application service monitoring tool that immediately reports error messages and system slowness to the appropriate technical staff, if it occurs. Continuous monitoring ensures the platform is always available, fast, and error-free for users.

These elements, combined, allow us and our partners to support thousands of individual requests for support each week.

Training

As the creator of the proposed ESA platform, Student First will provide agile, responsive, and efficient administration, training, and ongoing support for families, schools, providers, and IA DOE personnel.

Student First will provide the training needed to onboard users to the *Theodore* platform and is able to assist with ongoing training needs. Additionally, Student First will develop a formalized training manual and related materials, including a slide deck, talking points, and FAQ for each user type for program administrators to leverage as needed.

At the launch of each user type’s portal, Student First will host an interactive Zoom session for user onboarding covering an overview of the system, related user functionality, and a walkthrough of all major user actions. In our experience, these sessions are effective in supporting schools and providers in understanding their program responsibilities, as well as the approval process they can



expect before serving students with the available funds. At the end of the call, all attendees will be given the opportunity to ask questions and gain further insights into the portal. The demo portion of the video call will be recorded and that video will be uploaded to the help center for future reference. Student First will update the help center after each training session including step-by-step instructions for all major actions.

The training sessions and materials are further enforced by Student First's full-service technical support experience, including demo videos. Once in the portal, this includes a built-in messaging and ticketing system that allows users to directly contact us for targeted support. We customize program support on a project-to-project basis that includes, phone, email, and direct shared screen video to work through any specific user requests.

Based on our experience in 15 states, Student First recommends a user onboarding plan that includes the following elements:

Interactive Zoom Sessions: We recommend offering this training for schools once per year, and to providers quarterly as they become approved to serve students. For families, we recommend this annually for new participants and have found these to be less critical for programs that pay for tuition and fees exclusively, and more for those that reimburse other services and products, as the process and seeming ambiguity can be hard for families to navigate.

Eligibility Checklists: In particular, prospective providers and families benefit from checklists that outline eligibility requirements and specific documentation needed to apply for the program. While this will be included in the portal, this information should be included in the external marketing website as well as any promotional materials.

FAQs: Each user type will need targeted FAQs that are living documents, updated as trends in user questions are identified. This is best leveraged on the external marketing website, as well as in partner toolkits.

Partner Toolkits: Schools and community organizations are powerful partners in the implementation of education funding programs. We recommend that program administrators provide these entities with program toolkits they can leverage to share the opportunity with families and high-quality providers. Toolkits should include a one-page program overview, eligibility

checklists, and FAQs. If broader engagement is desired, we recommend including sample social media posts and newsletter blurbs in these toolkits.

Implementation Plan

Consulting and Professional Services

Student First's role is to offer demonstrable value at every project stage, and we do this through excellent communication, rigorous development and user testing, and continuous process improvement.

Our clients receive direct access to Student First's CTO and CEO during the contract life of the project, and we value partnering closely with program administrators to serve as thought partners for a scalable program design based on our experience in diverse education funding landscapes. Your project team will also include:

Product owner: The product owner's role is to align internal technical development priorities and ensure quality incremental delivery. They norm the team around the product vision and execute on the shared understanding of high-quality implementation. Further, they apply any system improvements from other client contexts to ensure IA DOE gets the highest functioning product possible.

Project manager: The project manager guides and supports the team toward the execution of the project's implementation plan. They work closely with all stakeholders and program administrators to identify project needs and align all capacity, priorities, timelines, and budgets to ensure on-time, efficient project completion.

Project Coordinator: The project coordinator directly supports the day-to-day work, and manages the documentation of critical project decisions and risks.

Our technical design starts with the end user's needs and works backward so that engineered products and projects provide the best experience possible to every stakeholder and user involved. We start new projects by identifying all program and technical requirements, and business processes leveraged by program administrators, schools, and providers, and by partnering closely with state agencies to identify opportunities to lower the barrier to entry to families.

Student First develops a discovery and implementation plan based on client preference. Program administrators can determine how simple or complex they prefer the discovery phase to be, and we've outlined below our typical processes in order to deliver an operational family application no later than May 1, 2023.

Weekly project meetings: We develop weekly project meetings in collaboration with clients and send them to the project team 24 hours before the meeting. Clients can expect notes and action items resulting from the meeting within 24 hours.

Biweekly status updates: At the end of every other week clients can expect an updated project timeline and deliverable status with a Gantt chart for their own tracking purposes.

Deep-dive meetings: As needed, Student First will hold deep-dive meetings of 60-90 minutes each to dig into specific programmatic requirements and design. Topics may include

- Family expense processes for reimbursement and provider payment,
- Provider quality bar and approval process,
- Qualified expense types, prioritization, and approval process, and
- Data and reporting strategy.

Process interviews: As needed, Student First will meet with owners of specific workflows to understand how they need to interact with the platform. This will likely need to occur with the program's operations manager to support efficient processes for expense management and financial controls, as well as with the ESA program manager as they plan for school and provider onboarding and management.

User flow and business process mapping: We will build our understanding of system requirements and user actions into flows and process maps to review with program administrators. This will result in a full list of technical requirements and business rules for client approval before the platform customization begins.

Multi-level user testing: Student First uses a rigorous internal user testing structure before engaging in iterative user testing with the client and stakeholders. Our user testing process starts with the program administrator giving initial feedback and requests before the broader program management team is engaged in user testing. We then recommend that a few key school or parent



users be leveraged in the final stages of user testing to ensure broad usability. Program administrators will receive a user testing protocol outlining the strategy, and each stage will include a testing checklist and feedback form to lower the lift for testers.

Website integration and support: We recommend that clients build an external marketing website for education funding programs to educate and engage all user types and direct them to take action by linking to the platform. (See client examples [here](#) and [here](#).) Student First will partner with the web developer to ensure strong code and design integration, and with program administrators to include embeddable widgets. Possible embeddable widgets include:

- An **approved schools widget**, enabling families to easily see what schools can receive ESA funds, and relieving program administrators of updating the approved schools' list in multiple locations.
- A **family eligibility widget** that can “fast track” users from the program website, directly into account creation.
- The **schools and providers map widget** allows families to see where schools and providers are physically located before engaging further.

IA DOE Program Administration

Our experience with education fund implementation shows optimal program success when state agencies partner deeply with a non-profit education partner that has experience serving families and schools to administer and support the program. Beyond their grassroots ties to communities, non-profit education fund administrators typically experience fewer barriers to navigate in order to adapt staffing or other strategic elements to best meet programmatic needs.

In cases where this is not feasible, we recommend one of two primary paths to implementation, requiring different levels of IA DOE staffing and capacity.

IA DOE as Administrator: In this option, state program administrators staff up to directly manage the program and awarded contractors. To perform these functions as needed, we recommend adding the following:

- a program manager and an
- dedicated operations manager.



These team members should report to an agency programmatic leader, or similar role, who has agency decision making authority over the use of resources and human capital. Existing agency systems for broader communications strategies should be a close partner over the life of the program. Ultimately this gives IA DOE very direct management over the program and has them deeply involved in day-to-day decision making, operations, and financial management, as well as stakeholder management.

Student First Technologies as Administrator: This path features the agency programmatic leader owning the ESA oversight and contractor management as one of the projects in their portfolio. In this scenario, Student First would staff up to directly run both the programmatic and technical elements of the program, adding a program director, an operations manager, and depending on the lift needed to recruit and select providers, a corresponding manager for that workflow. While IA DOE serves as an administrator and partner in this scenario, limited day-to-day capacity would be needed.

Subcontractors

Student First Technologies has developed strong subcontractor partnerships to offer holistic technical, consulting, and project management expertise to our clients across the country and intentionally partners with local nonprofits and small businesses when entering a new state. This grassroots approach is central to the Student First ethos, and has supported our success in new contexts over the years. We've outlined key relationships and expertise below.

Operations Advising

Michael Lindell is a seasoned executive with over 25 years of experience in multiple education funding roles including student loan origination and choice program administration. His past roles include the National Director of JPMorgan Chase Health's Student Loan Program, Chief Operating Officer of Sagamore Institute and Executive Director of Institute for Quality Education's Scholarship Granting Organization where he spearheaded the implementation of the statewide Tax Credit Scholarship program – completely digitizing the family and provider experience in Indiana and positioning it as a model for other state implementations. Michael's deep technical knowledge of program mechanics and proven track record of successful implementation make him a key asset to the Student First Technologies team.

Project Management and Consulting Systems

We partner with Audrain Advising, a woman-owned small business, for the setup and maintenance of project management and consulting services for our clients. Founder and Lead Advisor, Amber Audrain, has deep experience in education policy, program design, and implementation, as well as digital transformation and change management in both nonprofit and public sector contexts.

Audrain Advising has supported the implementation of our portfolio in multiple states, and we are excited to have their leadership on this exciting project as well.

Implementation Schedule

As requested in the RFP, Student First is prepared to deliver an operational product by May 1, 2023, allowing families no less than 60 days to apply to the ESA program.

All completion dates and deliverables will be negotiated in partnership with IA DOE upon contract approval to best serve the goals of the program and Iowa families.

Sample Timeline

Phase	Deliverable	Anticipated Completion Week
Planning & Discovery	Project Launch Meeting	Week 1
Planning & Discovery	Project Work Plan	Week 1
Planning & Discovery	Deep Dive Meetings (As needed)	Week 2 & 3
Build & User Testing	Approved Schools Portal Review & User Testing	Week 4
Build & User Testing	Family Application Review	Week 5
Build & User Testing	Family Portal Build	Week 5
Build & User Testing	Family Portal User Testing	Week 6
User Onboarding	Program Admin Onboarding	Week 7



User Onboarding	Approved Schools Zoom Onboarding	Week 8
User Onboarding	Approved Schools Portal Launch	Week 8
User Onboarding	Family Informational Webinar 1	Week 9
User Onboarding	Family Application & Portal Launch	Week 9
Build & User Testing	Provider Application & User Flow Review	Week 10
Build & User Testing	Provider Portal & Marketplace Review	Week 11
Build & User Testing	Provider Portal & Marketplace User Testing	Week 11 & 12
User Onboarding	Provider Application & Marketplace Launch	Week 13
User Onboarding	Approved Providers Zoom Onboarding	Week 14
	Family Application Closes	Week 15
User Onboarding	Approved Families Informational Webinar	Week 17

Optional Services

Embeddable Widgets

Student First has the ability to provide ESA programs with an embeddable widget for their external-facing program site so that visitors can receive critical program information for each user type, before taking programmatic action within the platform. This widget is not just a link but can directly communicate in both directions with the platform. You can view client examples [here](#) and [here](#).

Options include:

An approved schools widget, enabling families to easily see what schools can take ESA funds, and relieving program administrators of updating the approved schools' list in multiple locations.

A family eligibility widget can “fast track” users from the program website, directly into account creation.



The schools and providers map widget allows families to see where schools and providers are physically located before engaging.

Family Funded Digital Wallets

If IA DOE and the ESA program design permits, Student First can customize the system to allow families to add funds to their digital wallet. In this case, families that have added funds would be able to leverage those once their programmatic funds were depleted. When reapplying in subsequent years, families can simply update personal information and required verification without needing to resubmit repetitive information.

Further, in the spirit of the 2026 program expansion to universal eligibility, if desired, Student First is prepared to support IA DOE in creating family accounts for currently ineligible students, allowing families to fund their own digital wallet, and leverage the marketplace of high-quality services and products, including in-system scheduling access.

Family Engagement and Marketing

Student First has the ability to support IA DOE to address vendor marketing and outreach. On an ongoing basis, the Student First team monitors and engages with new vendors via direct sales to grow the service provider network available within the *Theodore* solution platform. Taking an “omni-channel” approach, Student First deploys state-specific branded media to grow provider enrollment. Further, we are able to provide IA DOE with an embeddable widget for the program’s marketing site so that visitors can engage with the program instead of immediately getting directed to the platform's website. This widget is not just a link but can directly communicate in both directions with the platform.

To grow awareness of the opportunities available through pandemic recovery funds, Student First benefits from organizational relationships and partnerships across the country. Our connections include ExcellnEd; EdChoice; The 50 State Afterschool Network; Yes.Every.Kid; The Reform Alliance; Home School Legal Defense Association; American Federation For Children; State Policy Network; and The Afterschool Alliance. In stand-alone campaigns, or in efforts with these strategic partners, Student First uses social media platforms (Facebook, Instagram, Twitter, etc.), podcasts, and PPC (pay-per-click) marketing to promote state-specific education funding programs. Full and custom marketing plans can be built and deployed upon IA DOE request and authorization.



Student First's *Theodore* database system has the ability to make an API (Application Programming Interface) call into IA DOE eligibility databases (i.e., families eligible for free and reduced lunch programs and other low-income programs). Through an API call, or through a provided dataset copy, Student First can create an automated, state-specific outreach and invitation campaign to eligible families.

Theodore's Provider Marketplace serves as a discovery platform for users inside and outside the program. We believe that a "rising tide lifts all ships" and that includes providing equity-based access to all for education provider discovery. We will vet all providers who apply based on IA DOE-specific standards and specifications. Families that receive program funding can only spend it with providers, and on services and products that are approved according to the program standards.

Depending on state law and IA DOE allotments families and providers have the ability to easily invite each other into applying through *Theodore* for the ESA program, this helps increase adoption and creates a network effect.

Appendix A – Indiana Learns Case Study

Overview

In 2021's legislative session, HB 1251 mandated the Indiana Department of Education to leverage a portion of their ESSER funds for student learning loss support. The Department contracted with a local nonprofit to manage the program, which then solicited proposals from technical providers across the country, ultimately awarding it to Student First Technologies.

The contract was awarded to Student First in August 2022.

The Challenge

Like many states, Indiana saw significant learning loss as a result of COVID-19. Particularly concerning were the widening of already dire achievement gaps, with the state's largest county showing Black and Latino state achievement pass rates at 8% and 10.5% respectively in 2021, compared to a 17.6% average pass rate.

This crisis elevated an already struggling state achievement, and the courageous leadership of The Indiana Department of Education and The Mind Trust saw an opportunity to leverage high-quality tutoring services to make a significant impact.

Our Solution

The stakes were high, with the program mandated to begin disbursing funds to families in Fall 2022.

Student First Technologies began with a discovery phase that sought answers for the following:

- What data-sharing collaboration with partnering state agencies could lower the eligibility verification lift for families?
- What was the vision for allowable services and expenses? What stakeholders needed to be included in the approval process for high-quality providers? What was the perceived risk of a process that was very open or too laborious?
- What data and reporting needs existed for both state and federal entities, as well as our client's non-profit leadership and board?



- What would make the first year of the program a success? Was there a vision for funds renewal even after the ESSER funds were depleted? What success measures would make that possible?
- What did our non-profit client, and the Indiana Department of Education IDOE, see as the largest program risks? How could we design to mitigate these risks on the front end?

We took our findings from process interviews, and deep-dive meetings with our client and stakeholders, built the first iteration of user flows and business process maps, and audited the technical systems we'd leveraged in 15 states to identify opportunities for customization for Indiana Learns.

Program requirements and goals made it clear that the following customizations would best serve Indiana users:

Student Eligibility: Due to state agency collaboration, the eligibility process could be customized to allow student account activation based on student STN (State Testing Number) and DOB (Date of Birth). This eliminated the need for a true application process and required that we build back-end verification systems based on data for income and academic eligibility.

Family Activation & Terms Agreement: Unique from other implementations the ability to activate families, as opposed to a traditional application process, led us to create a streamlined questionnaire. After its submission, families then agreed to the terms of service that outlined program responsibilities and appropriate use of microgrant funds before accessing their funded digital wallet.

Education Service Provider Application & Selection: IN DOE desired a rigorous provider selection process that would enforce a high-quality bar for services, while providing a clear explanation for providers that were denied. This led to an application process that included verification uploads, and very structured rubric scoring for each element. Program administrators then reviewed each application and made recommendations to a state-wide Review Committee for which providers should be approved. Upon approval, providers signed a contract in-system and began uploading their services for approval.



In-system Invoicing and Verification: There was a need for providers to invoice in-system in order to choose from pre-approved service types and from activated students. This also allowed providers to bulk upload receipts and attendance verification documents for program administrator review.

Data Management & Reporting: Student First served as the data manager for all programmatic data and worked closely with program administrators and IN DOE to build a strategy for ad hoc reporting needs and structured strategies for monthly and quarterly reporting requirements for ESSER dollars.

The Impact

Since families first accessed the portal on October 15, 2022, thousands of students have individually received multiple hours of high-impact tutoring from high-quality local and national tutoring providers across the entire state. Every day hundreds of hours of tutoring are delivered to students, with hundreds more scheduled daily.

Appendix B – Letter of Reference

Dear Iowa Selection Committee Members,

We would like to recommend Student First Technologies for the selection process regarding the administration and technology for the Iowa Educational Savings Account (ESA) program.

Here are some compelling reasons why:

Experience & Leadership: With extensive experience in working with education funding programs, Student First Technologies has a proven track record of delivering full-service high-quality solutions that meet the needs of students, families, and administrations.

Customization: Student First Technologies offers a highly customizable platform, Theodore, which will allow the program to meet the specific needs of the students/families in Iowa.

User-friendly platform: The Theodore platform is designed with ease of use in mind; therefore, making it simple for families, providers, and administrators to manage their accounts and interact with each other.

Strong security: Protecting sensitive student data is of utmost importance, and Student First Technologies takes security and privacy very seriously. Their platform is designed to ensure that all users' data is protected from unauthorized access and is supported by industry-leading cybersecurity protocols and insurance.

Efficient and cost-effective: The platform is designed to be efficient and cost-effective, which will help to minimize the costs associated with administering the ESA program and allow the program to grow long-term.

Customer support: Student First Technologies is committed to providing exceptional customer support, ensuring that families and providers receive the support they need to make the most of the program.

In conclusion, we believe Student First Technologies is a wise choice to administer the Iowa ESA program due to their experience and leadership, customization, user-friendly platform, strong security, efficiency, cost-effectiveness, and exceptional customer support. We encourage the committee to consider this recommendation and consider Student First Technologies for this important program.



We ask that the committee reach out for further information regarding our implementation experiences and why we believe Student First Technologies, as the only education-focused company providing education funding technology, should be selected to support Iowa in this way.

Sincerely,

Collectively witnessed and authorized by the following:

Betsy Wiley: President of [Institute for Quality Education](#)

E. betsy.wiley@h4qed.org

P. 317-870-2532

Program Info: Largest Tax Credit Scholarship Granting Organization in Indiana

Brandon Brown: CEO of [The Mind Trust](#)

E. bbrown@themindtrust.org

P. 317-946-3644

Program Info: [Indiana Learns](#) Department of Education ESSER funded microgrant education funding program

Sarah Guardiola: CEO of [Opportunity Scholarship Fund](#)

E. sarah@osfkids.org

P. 91--877-2710

Program Info: Tax Credit Scholarship Granting Organization in Oklahoma.

Marylin Hicks: Vice President of Operations of [Arete Scholars](#)

E. mhicks@aretescholars.org

P. 404-445-7262

Program Info: A leading Student Scholarship Organization in Georgia

Ronnie Daniel: Executive Director of [Children First Education Fund](#)

E. ronnied@childrenfirsteducationfund.org

P. 801-616-7848

Program Info: Utah's first and only Tax Credit scholarship & Tax Credit funded ESA education funding program

Appendix C – References

Student First Technologies has partnered with clients in 15 states to support the development of education funding programs. Below we submit client references, including contact information and project scope. We are happy to provide more references if needed.

Client Name	The Institute for Quality Education (IQE)		
Contact Name	Betsy Wiley; Mary Eaker	Title	President & CEO; Executive Director of SGO
Website	www.i4qed.org	Email	mary.eaker@i4qed.org betsy.wiley@h4qed.org
Project Overview	IQE is the largest non-governmental K-12 education funding program administrator in Indiana. They administer funds through tax credit scholarships to families. IQE was our first partner over 9 years ago. Student First Technologies now empowers IQEs entire program.		

“

“As the largest Scholarship Granting Organization in Indiana, we needed a software solution we could trust... Student First Technologies was able to customize the product to meet our specific needs, surpassing our expectations for software... The SFT team offers outstanding customer service, handling everything quickly and correctly.”

– Mary Eaker, The Institute for Quality Education

Client Name	Arete Scholars (Arete)		
Contact Name	Arthur Dupre	Title	CEO
Website	www.aretescholars.org	Email	adupre@aretescholars.org
Project Overview	Arete is an education funding program administrator in GA and LA. They administer funds through tax credit scholarships. Arete utilizes Theodore to manage their education funding programs.		

Client Name	The Mind Trust		
Contact Name	Brandon Brown	Title	CEO
Website	www.themindtrust.org	Email	bbrown@themindtrust.org
Project Overview	The Mind Trust is in charge of running the \$20 million plus Indiana DOE microgrant program 'Indiana Learns' which provides high-impact tutoring to 4th and 5th graders who experienced learning loss. In several months Student First configured a customized Theodore instance to fully meet the robust programmatic requirements set forth by The Mind Trust and the IN DOE.		

“

“Student First Technologies custom configured their innovative platform *Theodore* which met a critical need for Indiana's microgrant program *Indiana Learns*. We needed a tool that was both an application platform and a digital wallet coupled with an education provider marketplace, and one that would lower the lift for the thousands of families activating accounts and choosing services. Their close partnership shared a sense of urgency, and creative problem-solving resulted in the first families accessing *Indiana Learns* in October 2022. We couldn't be happier recommending states work with SFT to support families through this program.”

– Brandon Brown, The Mind Trust

Client Name	Opportunity Scholarship Fund (OSF)		
Contact Name	Sara Guardolia	Title	CEO
Website	www.osfkids.org	Email	sarah@osfkids.org
Project Overview	OFS is an education funding program administrator in OK. Student First Technologies took OFS from running on paper and spreadsheets with a \$5 million cap to fully automated and online via Theodore, this helped them expand with increased efficiencies. This helped		



	expand the cap to \$50 million.
--	---------------------------------

Client Name	Arizona Tuition Connection (AZTC)		
Contact Name	Tim Kuhn	Title	Executive Director
Website	www.arizonatuitionconnection.com	Email	tim@arizonatuitionconnection.com
Project Overview	AZTC is an education funding program administrator in AZ. They are the largest Tax Credit Scholarship organization in Arizona serving over 10k families. Student First Technologies provides end-to-end support through Theodore to run their organization.		

Client Name	The Reform Alliance (RA)		
Contact Name	Emmy Henley	Title	Managing Director
Website	www.thereformalliance.org	Email	emmy@thereformalliance.org
Project Overview	RA is an education funding program administrator in AR. We power all of The Reform Alliances education funding programs from application to fund disbursements through Theodore.		