Frequently Asked Questions (FAQs)
Regarding Student Data Privacy Protection
and Overall Participation in the *Cali* AI Chatbot Pilot

Cali is an innovative, two-way chatbot engagement platform, to help students apply for financial aid. *Cali* proactively engages students via text message to increase engagement, drive action, build connection and gain insights into the barriers and challenges students face when completing the Free Application for Federal Student Aid (FAFSA) or California Dream Act Application (CADAA).

1. **What are the steps to having my district sign up to participate in the *Cali* Chatbot Pilot?** If you are a school district personnel interested in an opportunity to join the Pilot, you can contact aichatbot@csac.ca.gov for your questions or interests.

   The process for a school district to join the *Cali* Program includes a meeting with Mainstay, the service provider, who will provide a comprehensive overview and answer all of your questions. Following the meeting, school districts will have an opportunity to review and sign a contract to officially join the Pilot. And then, move on to the onboarding process.

2. **What is the purpose of *Cali* the AI Chatbot Pilot project?** This pilot was launched as an effort to maximize the number of high school seniors who complete financial aid applications across the state of California. The strongest predictor of college enrollment is the completion of financial aid forms, and students are more likely to pursue higher education when they are aware of the resources available to them. We believe *Cali* can provide the help needed to apply for financial aid!

3. **What personal information is needed for a student to participate in *Cali*?** To proactively communicate with students by text, *Cali* requires the student's first name, last name, cell phone number and the name of the student's high school. This information will be supplied directly by the parents during the opt-in process and is not required to be supplied by the district. Additionally, as part of the data sharing agreement, Districts will be asked to supply FAFSA/CADAA completion information (and other optional data fields) to help personalize information to students (please see below). A copy of the *Cali* Chatbot Consent form can be accessed: https://mainstay.com/fafsa-service-consent/

4. **How will *Cali* use my student's personal information?** *Cali* will use the student's cell phone number to send text messages designed to keep them

informed about the importance of filling out a FAFSA or a CADAA and *Cali* will provide guidance on how to complete their financial aid application. Other directory information may be used to personalize the communication to the student. Students will receive messages that are relevant to them. For example, *Cali* will send reminders to students to complete the FAFSA or CADAA, but will exclude messages to students who have already completed their application. If a student has not yet completed their application, *Cali* will remind them of the submission deadline and ask if they need any assistance.

5. **How is my student's personal information protected and kept confidential? Where is the personal data housed and who has access to it?** The student data will be stored and protected in databases managed by Mainstay, the service provider, which are on Amazon Web Services (AWS), a comprehensive cloud platform. Mainstay is SOC 2 Type II compliance certified, a significant designation that showcases their commitment to data security and privacy. This achievement demonstrates our dedication to safeguarding district partners' sensitive information and upholding the highest standards of security and compliance. Mainstay is bound to utilize personal information only as stipulated in the Mainstay-District contract's terms and conditions. Student data privacy protections are built into the terms and conditions and in compliance with all state and federal privacy requirements. Only authorized personnel, such as administrators or designated staff members, are granted access to the personal data based on their roles and responsibilities.

6. **What happens with the information *Cali* learns about the student through their general texting conversations and interactions?** Some information can be intentionally captured, such as responses to surveys or check-ins, and used to personalize future messages. For example, if a student indicates that they're interested in a topic (i.e. scholarships), then you can use that to make sure they get proactive messages about that topic. It is important to remember that *Cali* will be asking and responding to questions dealing with the FAFSA, the CADAA, and general financial aid questions. Questions beyond these topics will be redirected to school counselors or staff.

7. **What happens if a student tells *Cali* something concerning or asks a question *Cali* cannot answer?** *Cali* is trained to pick up on sensitive terms like "kill" or "die" or various phrases associated with such terms. If a student's response triggers one of *Cali*'s "sensitive topics", the message will be escalated to the designated contact at that student's high school. The student will always get a response from *Cali* at the time the message is sent indicating when the conversation will be handed off to a human for help.

8. **How often will the student interact with *Cali*?** Students will be able to interact with the *Cali* on a 24/7 basis if they choose to text into *Cali* and receive answers. Some of the messages that *Cali* sends to them will also ask them questions to check in on the status of some of the requirements to successfully complete financial aid applications. Some students may actively

engage with *Cali* (answer questions, ask questions, etc.) which we call "active engagement". Other students may decide to receive messages from *Cali*, but not respond in any fashion, which we call "passive engagement". The student's interaction with *Cali* is at their discretion.

9. **Will *Cali* be accessible in other languages?** Mainstay, the service provider, translation is powered by the Google Translate API. You can find detailed information about the quality of automated translation here: https://ai.googleblog.com/2020/06/recent-advances-in-google-translate.html

   For the most common languages, you can see that this model achieves a BLEU score above 50, which is *"very high quality, adequate, and fluent translations."*

10. **What personal data requirements are placed if the student is 17 years of age or younger? What if the student is 18 or older?** The data needed for students will be the same no matter what the age. Mainstay, the service provider, complies with FERPA regulations and afford parents of students under 18 the right to access their child's records, the right to seek to have the records amended, and the right to have some control over the disclosure of personally identifiable information.

11. **Who do I contact if I have any questions regarding the use of personal student data?** Students and parents should contact their high school administration. Administrators from any participating high school can contact Mainstay, the service provider, via support@mainstay.com.

12. **How does the *Cali* AI Chatbot know whether a student has completed a FAFSA or a CADAA?** The California Student Aid Commission currently provides a weekly download of FAFSA and California completion data to school districts as part of the *Race to Submit Dashboard:* https://www.csac.ca.gov/data-dashboards. This helps districts target which students have yet to complete their financial forms. Like Race to Submit, the district will make this data available to Mainstay to ensure that *Cali* is informed on whether a student has completed their FAFSA or CADAA.

13. **What is the difference between this two-way AI platform and ChatGPT?** *Cali* sends proactive reminders and guidance to students to help keep them on track over SMS text. *Cali* can also respond to student questions using a pre-built knowledge base of questions and answers, based on millions of questions previously asked by students. While ChatGPT generates responses that replicate human conversation, *Cali*'s knowledge base has been vetted to ensure accuracy, and coordinated by a team of experts to deliver timely intervention (before it's too late).

14. **How is this Pilot funded and much will it cost district to participate? Will this be more work for school district staff?** This pilot is funded

philanthropically, and there is no cost for invited school districts to participate. *Cali* can guide students in completing a FAFSA or CADAA. It is very likely that *Cali* will address students' questions without ever needing to engage school staff. Historically, similar chatbot initiatives have decreased staff workload by answering most basic and intermediate questions automatically, allowing the human staff to focus on the more pressing needs of students. Each participating district will be asked to provide a primary point of contact to work alongside Mainstay to onboard their schools, which is a minimal commitment since Mainstay will manage the day-to-day operations of the chatbot pilot.

15. **How will we know if the *Cali* AI Chatbot pilot is making a difference?** *Cali*'s impact is evidenced by increased FAFSA and CADAA completion rates. Using the weekly downloads of FAFSA and California data provided to school districts via The California Student Aid Commission's Data Dashboards: https://www.csac.ca.gov/data-dashboards, we can determine whether or not *Cali*'s proactive messaging drives more students to complete their applications, as compared to previous financial aid cycles.