

AI Transparency Disclosure

MOSAIC · WIDA-aligned English Language Development Assessment

This document discloses how **MOSAIC by LERNO Co.** uses artificial intelligence across the MOSAIC product line, aligned to the **NYCPS SY 2026-27 AI and Screen Time Policy**, NYS Education Law §2-d, Chancellor's Regulation A-820, FERPA, and COPPA.

NYCPS SY 2026-27 AI Policy Compliance

The NYCPS AI & Screen Time Policy for the 2026-27 school year (a) imposes a one-year moratorium on student-facing **generative** AI tools for grades 2K–8, (b) restricts high-school AI use to five centrally approved pilots, and (c) grants explicit exemptions for **assessments**, **English Language Learners (ELLs)**, and **assistive technology mandated by IEP/504 plans**. MOSAIC's compliance posture, product-line by product-line:

- **LERNO Print CO (product on sale today):** Printed WIDA-aligned instructional materials shipped as PDF/booklets. **No student-facing AI. Zero screen time.** No AI runs on any NYCPS device, server, or account. Fully outside the scope of the NYCPS AI Policy. Also independently qualifies for three exemptions: assessment, ELL, and IEP/504.
- **MOSAIC Digital Platform (future — not yet released):** Should LERNO Co. release a digital administration mode, it will operate under the AI Policy's three exemptions (assessment · ELL · IEP/504) and will use only **non-generative speech recognition** for transcription — never generative chatbots or virtual tutors. Any digital release will complete full ERMA vetting prior to school access.
- **Content generation (internal, build-time only):** AI models used to draft stimulus artwork run inside the MOSAIC engineering pipeline before content ships. They never run on an NYCPS device, network, or during instruction. Analogous to a textbook publisher using AI illustration during manuscript preparation.

Where AI is used (by MOSAIC surface)

- **Content generation (build-time only):** Google Gemini 3.1 Flash Image ("Nano Banana") generates culturally-inclusive stimulus images for reading and listening prompts. Content is reviewed and approved by MOSAIC content editors before publication. **Runs pre-shipment on LERNO Co. infrastructure; no student data ever reaches Gemini; no NYCPS device or account interacts with Gemini.**
- **Speaking-response transcription (Digital MOSAIC, future):** OpenAI Whisper is a **non-generative** speech-recognition model. When a student completes a speaking task in a future digital release, audio may be transcribed to assist teachers in scoring. Whisper does not chat, tutor, or generate content; it converts audio to text. Transcripts are stored in the district-scoped MongoDB cluster (not with OpenAI) and are auto-deleted after the district-elected retention window (default 90 days).
- **Report narrative summaries (opt-in, teacher-only):** Anthropic Claude may draft plain-language parent letter summaries from a student's proficiency profile **for teacher editing before delivery**. Feature is **opt-in per district**, defaults OFF, and every AI-drafted sentence is teacher-reviewed. Never runs on a student device. Categorized as teacher instructional-planning use, which is permitted under the NYCPS AI Policy (excluding grading, behavior monitoring, or IEP/mental-health planning — none of which MOSAIC does).

Where AI is NOT used

- **Scoring:** All WIDA proficiency scores are computed from deterministic rubrics — no AI grading, no black-box scoring model. Complies with NYCPS AI Policy's prohibition on AI for grading.
- **Placement decisions:** Composite MOSAIC Level 1–5 assignment is 100% deterministic (L 17.5% · S 17.5% · R 32.5% · W 32.5%).
- **Behavior monitoring, IEP planning, mental-health plans:** MOSAIC does not use AI for any of these — explicitly prohibited categories under the NYCPS AI Policy.
- **Student-facing chatbots or virtual tutors:** MOSAIC contains no generative AI students interact with. The one-year 2K–8 moratorium does not apply to MOSAIC.

- **Automated denial of services:** MOSAIC does not use AI to deny, restrict, or gate any student's access to instruction or accommodations.

Safeguards

- **FERPA / §2-d compliant:** Signed Data Privacy Agreement (see companion **MOSAIC_NYS_Section_2d_DPA.pdf**) available for every district. No PII shared with any third-party AI vendor.
- **Human-in-the-loop:** Every AI-generated artifact (images, transcripts, narratives) requires human review before reaching a student or parent.
- **Bias audits:** WIDA-alignment audits + NYS ALD alignment review are run on every assessment window release.
- **Opt-out:** Districts may disable all AI-adjacent features (Whisper transcription, Claude narrative drafts) via a single toggle. Screening and scoring continue to work without any AI features enabled.
- **ERMA-ready:** Full ERMA vendor assessment, DPA, IT Security Review, and OTI Cloud Review artifacts are pre-drafted and available on request — see companion **MOSAIC ERMA Compliance White Paper**.

Vendor contacts

Data Protection Officer: **compliance@mosaicassessmentco.com** · Public site: **mosaicassessmentco.com** ·
Companion DPA: **MOSAIC_NYS_Section_2d_DPA.pdf** · ERMA Whitepaper:
MOSAIC_ERMA_Compliance_White_Paper.pdf