

User Manual

AMIRA TUTOR / TUTORA

ABSTRACT

The Amira Tutor/Tutora User Manual serves as a comprehensive guide for educators, administrators, and stakeholders to understand, implement, and optimize the use of Amira Tutor/Tutora—an AI-powered, research-backed reading coach within the Amira Reading Suite. This manual outlines the design, features, and instructional strategies behind Amira Tutor/Tutora, which delivers one-on-one, adaptive reading support for students across diverse learning needs and grade levels. This edition reflects product updates introduced for Back to School 2026, including changes to Tutora Spanish interventions, story recommendations, Amira’s voice, Placement Manager, Tutor Language Settings, and a change to the reading cursor experience.

DATE

2026–2027 School Year

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Part 1: Overview of Amira Tutor/Tutora

1.1 Purpose of Tutor/Tutora in the Amira Reading Suite

Amira Tutor/Tutora is an AI-powered reading coach that provides one-on-one tutoring support for students across all reading levels in either English (Tutor) or Spanish (Tutora). Built on advanced speech recognition and natural language processing technology developed at Carnegie Mellon University, Amira Tutor/Tutora serves as a patient, encouraging virtual tutor that listens to students read, provides real-time feedback, and adapts instruction to meet individual learning needs.

The tutoring system represents a revolutionary approach to reading instruction by combining the latest in artificial intelligence, the Science of Reading, and neuroscience research. Students engage with texts appropriate for their reading level while receiving immediate support for word recognition, fluency development, and comprehension strategies through natural conversation and adaptive micro-interventions.

Amira Tutor and Amira Tutora: Two Licensed Products

English and Spanish reading practice are offered as two separate, independently licensed products. Amira Tutor provides AI-powered reading practice and tutoring in English. Amira Tutora provides the equivalent experience for reading practice in Spanish, including the Spanish-specific intervention model described in Section 1.4. A district may license Tutor only, Tutora only, or both. Districts that license both can give a student access to English reading practice, Spanish reading practice, or both, depending on how the student is configured in Tutor Language Settings (see Section 3.3). Throughout this manual, "Tutor" refers to the English product and "Tutora" refers to the Spanish product unless otherwise noted; where a feature applies to both, it's called out explicitly.

Key Components of Amira Tutor/Tutora

- **AI-Powered Reading Support:** Advanced speech recognition technology that achieves 96% agreement with human expert judgment—equivalent to the inter-rater agreement between two expertly trained teachers scoring the same reading.
- **Real-Time Micro-Interventions:** Immediate assistance with unfamiliar words, pronunciation guidance, and reading strategy prompts delivered through natural conversation and targeted support based on reading science principles.
- **Text Sets:** Thousands of leveled texts organized around Core Knowledge topics and background knowledge themes, automatically updated based on progress and assessment data, and aligned with district curriculum.

- **Adaptive Instruction:** Dynamic adjustment of support levels, text complexity, and instructional focus based on student performance patterns and individual learning needs.
- **Comprehensive Progress Monitoring:** Continuous tracking of reading growth, engagement metrics, and skill development across all tutoring sessions
- **Motivational Elements:** Badging system and celebration of milestones to maintain student engagement and build reading confidence.
- **English and Spanish Practice & Support:** Students can practice reading in English through Amira Tutor and in Spanish through Amira Tutora (licensed separately, or together for a combined experience), and can read in English while receiving instructions and tutoring in Spanish.
- **Comprehension Conversations:** Dynamic, AI-led Socratic dialogues that mirror authentic classroom discussion and strengthen understanding by prompting students explain, reflect, and connect ideas.
- **Badging:** Badging system rewards students with digital badges for demonstrating growth in reading skills, motivating continued practice and celebrating progress.

1.2 Research-Based Efficacy and Evidence

Amira (formerly Project LISTEN's Reading Tutor), is an advanced, AI-powered literacy assessment and tutoring platform designed to provide personalized reading practice and immediate feedback to improve literacy outcomes (Amira Learning, 2022, 2024; Instructure, 2024; Jeans, 2025; Korsah et al., 2010; Mathes et al., 2016; Poulsen et al., 2007). Amira Tutor/Tutora functions as a one-on-one digital tutor, leveraging voice recognition and machine learning to adapt to each student's needs (Poulsen et al., 2007).

Key Findings on Efficacy

The most recent efficacy studies indicate consistent positive impacts on student reading growth, particularly for English Language Learners (ELLs) and middle school students. For more information see our [Research site](#).

Consistent Growth and High Effect Sizes

Amira Learning's AI-powered tutoring capabilities have shown significant increases in reading performance [ND_2023_2024_Tutor_English_NDSA.pdf, LA_2023_2024_Tutor_English_Amira Learning in Louisiana Public schools.pdf].

Studies consistently report effect sizes comparable to high-quality one-on-one human tutoring [National_2025_Tutor_English_Amira Impact for Middle School Students.pdf, White

Paper_ AI Tutoring Powers Reading Growth For MLLs_ELLs In English & Spanish.pdf, TX_2024_Tutor_English_Texas Efficacy Research.pdf].

For example, the effect size for reading fluency in Savannah–Chatham Public Schools was measured at 0.45 [National_2022_Tutor_English_Meta-analysis of Amira Research.pdf], and for middle school students, effect sizes ranged from 0.35 to 0.40 across two consecutive years [National_2025_Tutor_English_Amira Impact for Middle School Students.pdf]. The Utah State Department of Education's analysis indicated a 0.45 effect size, representing 1.5 years of growth in a year with 30 minutes of weekly use [White Paper_ AI Tutoring Powers Reading Growth For MLLs_ELLs In English & Spanish.pdf].

Comparable to Human Tutoring

Research has consistently shown that the system's foundational technology is as effective as certified human tutors and can rival one-on-one human tutoring in driving reading growth (Amira Learning, 2019, 2024).

Impact Across Grade Levels and Subgroups

Kindergarten through Grade 3: Students using Amira have demonstrated higher spring DIBELS scores than non-users, with statistically significant results across all grade levels in Louisiana [LA_2023_2024_Tutor_English_Amira Learning in Louisiana Public schools.pdf].

Grades 3–5: In North Dakota, students in the highest usage quartile (approaching or exceeding 960 minutes per year) scored up to 15 points higher on the NDSA ELA than those with the lowest usage [ND_2023_2024_Tutor_English_NDSA.pdf].

Grades 4–5: Students in Louisiana who used Amira had higher spring LEAP ELA scores than non-users, also statistically significant. [LA_2023_2024_Tutor_English_Amira Learning in Louisiana Public schools.pdf].

Middle School (Grade 6): Consistent use of Amira (20–30+ minutes per week) led to 6–7 percentile point gains compared to low-usage peers over two consecutive years, even after controlling for initial reading levels [National_2025_Tutor_English_Amira Impact for Middle School Students.pdf].

English Language Learners (ELLs)/Multilingual Learners (MLLs): Research highlights large effect sizes for multilingual students, with one study showing a 0.68 effect size in oral reading fluency for ELLs [White Paper_ AI Tutoring Powers Reading Growth For MLLs_ELLs In English & Spanish.pdf]. Amira's ability to tutor in English, Spanish, and use Spanish as a scaffold for

English literacy supports diverse linguistic backgrounds [White Paper AI Tutoring Powers Reading Growth For MLLs_ELLs In English & Spanish.pdf].

Importance of Usage Dosage

The studies consistently emphasize that adherence to recommended usage thresholds (typically 30 minutes per week) is crucial for maximizing the platform's impact [ND_2023_2024_Tutor_English_NDSA.pdf, National_2025_Tutor_English_Amira Impact for Middle School Students.pdf, White Paper_ AI Tutoring Powers Reading Growth For MLLs_ELLs In English & Spanish.pdf]. Higher usage is consistently associated with stronger literacy development across various outcomes [GA_2020_2021_Tutor_English_The Consortium for Policy Research in Education (CPRE).pdf, National_2022_Tutor_English_Meta-analysis of Amira Research.pdf].

For instance, students meeting or exceeding 20 minutes of Amira usage per week demonstrated approximately double the percentile rank improvement compared to minimal users in middle school [National_2025_Tutor_English_Amira Impact for Middle School Students.pdf].

Evidence and Reliability

The efficacy of this tutoring system is supported by a robust body of research. It meets the Every Student Succeeds Act (ESSA) criteria for Level 2 "Moderate" evidence (Instructure, 2024) and "[Level 3 "Promising"](#)". Its effectiveness has been demonstrated in gold-standard randomized controlled trial studies across various geographies, grade levels, and student populations, and its findings are consistent with meta-analyses on intelligent tutoring systems (Amira Learning, 2019, 2022, 2024).

Alignment with Science of Reading

Amira's design and success are attributed to its alignment with Science of Reading principles, including explicit phonics, guided oral reading, and adaptive practice [National_2025_Tutor_English_Amira Impact for Middle School Students.pdf]. It incorporates foundational literacy skills like phonological awareness, phonics, decoding, oral reading fluency, and vocabulary acquisition [ND_2023_2024_Tutor_English_NDSA.pdf].

1.3 Understanding Amira's AI Tutoring System

Amira Tutor/Tutora employs cutting-edge artificial intelligence to transform how we support children's reading development. The AI system consists of two interconnected components working together to provide responsive, individualized reading instruction that adapts in real-time to student needs.

Core AI Technologies

Reading Error Detection (RED) Model: When a student reads aloud to Amira, the RED model analyzes their speech patterns to identify specific reading challenges. Unlike generic speech recognition systems, Amira's RED model is specifically designed to evaluate reading skill, distinguishing between genuine reading errors and natural speech variation due to developmental factors, accent, dialect, or other factors unrelated to reading ability. This specialized AI was developed over 5 years by a highly experienced AI team in collaboration with experts from Carnegie Mellon and Johns Hopkins Universities, achieving 96% agreement with human expert judgment.

Micro-Intervention Selection Model: Working in tandem with the RED model, this sophisticated system:

- Analyzes detected reading errors in real-time
- Evaluates the specific context of the student's struggle
- Considers the student's historical performance and skill mastery profile
- Examines linguistic properties of the text and words being read
- Selects the most appropriate micro-intervention based on reading science principles

Placement Manager: Real-Time Word Tracking

As a student reads aloud, Amira's Placement Manager tracks their position in the text in real time, driving the on-screen reading cursor and detecting when the student has finished a phrase so Amira can respond or advance to the next one.

For Chromebook users reading English content, Placement Manager runs a small AI model directly in the student's browser instead of sending every word to a server and waiting for a response. This removes the network round-trip that previously caused the cursor to lag or jump, especially on slower internet connections, so word tracking feels faster and more in sync with what the student is saying. Audio is still sent to the server for deeper analysis, such as deciding whether and what kind of intervention to give. This improvement is available for Chromebooks and English content as of Back to School 2026; support for additional devices and Spanish is planned for a future release. All other devices and languages continue to use the previous server-based tracking, with the same experience as before.

Amira's Voice

Amira speaks to students using natural, AI-generated speech to give directions, model reading, and deliver interventions.

Amira's Spanish voice provides authentic pronunciation and cadence for young Spanish readers and listeners. All of Amira's Spanish spoken scripts were also reviewed and revised by native Spanish speakers for accuracy and natural phrasing. This update applies to Amira Direct customers across Tutora, Enseñar, and Evaluar. HMH customers will continue to use the previous Spanish voice at this time.

How the AI System Works

Comprehensive Data Capture: Amira's AI approach captures hundreds of data points during a single reading session, creating a comprehensive picture of each student's reading abilities and providing targeted support at the moment of need.

Expert-Guided Training: The AI system is trained on extensive data including:

- Expert annotation of over 10,000 hours of children's reading by trained specialists
- Rigorous annotation rubrics aligned with reading science
- Over 5 years of accumulated feedback from educators in real classrooms
- Thousands of expert-labeled examples of appropriate reading interventions
- Deep analysis of which interventions work best for specific error types and student profiles

Intelligent Decision Making: For example, when a student successfully sounds out a word but cannot produce the full word, Amira might deliver a micro-intervention to help the student blend sounds. If a different student has shown evidence of mastering most decoding skills but makes miscues on unfamiliar vocabulary, Amira might deliver vocabulary or background knowledge oriented micro-interventions.

Ensuring Fairness and Effectiveness:

- Amira's AI systems are designed to be fair, accurate, and effective for every child, regardless of background or speech patterns.
- The systems:
 - Recognize and accept diverse accents and dialects
 - Accommodate developmental speech patterns
 - Show equivalent accuracy across gender, racial and ethnic groups, and for English language learners
 - Undergo continuous testing to ensure no bias against any student population
 - Adapt intervention strategies to individual learning styles and needs

Regular evaluations show that Amira performs consistently across all demographic groups, with accuracy rates exceeding 95% for each subgroup.

1.4 Tutor/Tutora Features and Capabilities

Amira Tutor/Tutora offers a comprehensive suite of features designed to support reading development across all skill levels and learning needs, grounded in the Science of Reading and aligned with Scarborough's Reading Rope framework.

Text Sets

Amira is designed to deliver text sets that align with the district's sequence of Core-Knowledge Topics. Amira text sets are derived specifically from and totally aligned to a district's chosen curriculum. Amira's AI ingests and absorbs districts' lesson plans and calendar, and offers text sets to match.

What makes an Amira Text Set?

Each text set is anchored to a key text within the district's chosen curriculum. Each has a set of 4 to 9 supporting texts, and texts may be leveled to different degrees of text complexity. Each set has a "hook text" that is typically used as the introductory passage.

Components of High-Quality Text Sets

Component	Description	Rationale/Research Support
Input: Anchor Text	A complex, grade-level text that serves as the central focus of the unit. This text likely comes from the core curriculum. The anchor text is provided to Amira, not generated by Amira.	Provides a shared, challenging text that grounds the unit and serves as a target for comprehension. The surrounding texts build knowledge to support access to this text. ³
Amira Output: Supporting Texts	A collection of texts gleaned from Amira's library or generated by Amira that are appropriate given the CK Topic and the Anchor Text. Each supporting text is leveled by AI to various complexity levels (below, at, and above grade level).	Ensures all students, regardless of their current reading level, can access the core knowledge and vocabulary of the unit, scaffolding them toward grade-level material. ²
Amira Output: Hook Text	A compelling, high-interest passage used to introduce the topic and spark student curiosity at the beginning of a unit.	Captures student attention from the outset, leading to higher engagement and motivation throughout the unit of study. ³

Amira Output: Background Knowledge Skill Sequence	A sequence of CK Topics that mirrors the district's plan for instruction over the course of the school calendar.	Enables Amira to flow text sets to students in lock step with the teacher's instruction.
Either Core Input or Amira Output: Vocabulary List	A list of key vocabulary that a student should learn.	Vocabulary lists are sometimes built into the core and sometimes not. Amira text sets use the core's vocabulary when it exists.

Text Maturity Filtering

All Tutor and Tutora stories are tagged with a minimum grade level based on content appropriateness—this is separate from a story's reading difficulty level. Amira's recommendation engine uses this tagging to avoid serving mature-themed content to younger students who read at a higher level (for example, a 1st grader reading at a 4th-grade level will not be served content intended for older students). Multi-part stories use the most restrictive grade rating across all parts so a sequence doesn't break partway through. This filtering does not apply to students in the Early Reader Skills Scaffold (ERSS) or to decodable text content packs.

Story Rereading

Once a student's pool of unread eligible stories drops below five, Amira begins filling remaining story selection slots with stories the student has already read in the last two months, oldest-read first, so students always have something to read. All of the usual story rules (reading level, language, and licensed content) still apply to reused stories, and students aren't shown any indication that a story is a repeat. If a teacher reports a student seeing a story again, that's this feature working as intended; if a student or teacher ever sees "No stories available," that should be reported to the Amira team as a bug.

Early Reader Skills Scaffold

The Early Reader Skills Scaffold (ERSS), developed in collaboration with Dr. Katie Pace Miles, offers a structured set of research-based practice activities tailored for Early Readers and Pre-Readers. When Amira or a teacher identifies a student in one of these categories, the student receives targeted support through the ERSS. Kindergarten and First Graders are automatically placed in ERSS. Students can also be placed in ERSS via an Amira assessment. These highly scaffolded activities are designed to build foundational literacy skills and foster early reading development.

This structure is crafted to foster early literacy growth, ensuring that each learner receives the necessary support to build foundational reading skills. ERSS is available in both Tutor and Tutora. A video demonstration and full details can be found [here](#).

English and Spanish Reading Practice: Tutor and Tutora

Amira Tutor (English) and Amira Tutora (Spanish) together offer a seamless experience for districts that license both. The AI listens to students read aloud in either language and provides real-time, responsive tutoring tailored to the student's needs, with each language's reading practice and intervention model built specifically for how literacy develops in that language. Amira's Tutora intervention experience has been completely rebuilt for the 2026–27 school year, including a new selection system specifically designed to support Spanish literacy development and brand new Spanish-only syllable-based interventions. For a complete description of Amira's intervention types, please see the [Intervention Encyclopedia](#).

Additionally, within Amira Tutor, English Learners can read in English while receiving scaffolding, directions, and tutoring in Spanish (an English–tutor setting, available without a Tutora license)—helping English Learners access reading practice with linguistic support. Full Spanish reading practice, where the student reads Spanish text, requires an Amira Tutora license.

Comprehension Conversations

Comprehension Conversations are interactive, oral discussions designed to build students' understanding of what they've read. After completing a story, Amira engages students in a conversation using open-ended, text-based questions that prompt critical thinking and verbal expression. These AI-led discussions are aligned to research-based comprehension strategies and allow students to demonstrate their understanding through spoken responses. By capturing and analyzing student answers in real time, Amira provides insights into comprehension growth while helping students practice essential skills like making inferences, summarizing, and citing evidence.

Comprehension Conversations are available in some stories at the 3rd grade reading level and higher.

Reading Support Features

Word-Level Assistance:

- Immediate pronunciation support for unfamiliar words
- Context-based vocabulary instruction with visual associations
- Morphology and word structure guidance

- High-frequency word practice and reinforcement
- Strategic decoding support with sound-it-out prompts

Fluency Development:

- Paced reading practice with adjustable speed
- Prosody modeling and feedback
- Repeated reading opportunities with progress tracking
- Expression and intonation guidance
- Building independence in reading flow

Comprehension Support:

- Comprehension Conversations: AI-led Socratic dialogues that prompt students to engage more deeply with text by making inferences, summarizing key ideas, and articulating their thinking
- Strategic questioning during and after reading
- Summarization prompts and guidance
- Connection-making opportunities (text-to-self, text-to-text, text-to-world)

1.5 Integration with Assessment Data

Amira Tutor/Tutora creates a seamless connection between assessment and instruction by utilizing data from Amira Assess to inform and personalize the tutoring experience. This integration ensures that tutoring directly addresses identified learning needs and supports targeted skill development.

Assessment-Informed Tutoring

Diagnostic Integration:

- Automatic text level placement based on Amira Reading Mastery (ARM) scores
- Vocabulary instruction aligned with assessed word knowledge gaps
- Standards-aligned comprehension instruction

Ongoing Progress Monitoring:

- Continuous tracking of Words Correct Per Minute (WCPM) during tutoring
- Real-time updates to Estimated Mastery
- Integration with ARM score development
- Dynamic progress line calculations using sophisticated algorithms

Responsive Instruction:

- Dynamic adjustment of text complexity based on session performance

- Automatic skill focus changes as mastery develops
- Intervention intensity modification based on progress patterns
- Alert systems for concerning trends or accelerated growth

Data Flow Integration

The tutoring system both receives and contributes to formative assessment data:

Receives from Assessments:

- Individual skill gap identification through Skills Diagnostic reports
- Current reading level placements using ARM scores
- Risk indicators and intervention needs from dyslexia screening

Contributes to Assessment Profile:

- Session-by-session reading performance data
- Skill practice and mastery progression tracking
- Engagement and motivation indicators
- Response to intervention effectiveness measures
- Estimated Mastery calculations for progress monitoring

Amira Core Metrics

Read an overview of Amira's Core Metrics [here](#).

Amira Core Metric	Definition	Purpose
Amira Reading Mastery (ARM)	The Amira Reading Mastery (ARM) score serves as the anchor metric, providing a comprehensive measure of oral reading development that synthesizes WCPM and accuracy into a psychometrically valid measure. The ARM score is expressed relative to grade level; for example, an ARM score of 2.4 indicates that the student is reading at the level typically expected of a 2nd grader in the 4th month of the school year.	ARM scores are produced for every student who completes the screening process, even if they are unable to read connected text and are still building foundational skills.
Oral Reading Fluency (ORF)	The speed, accuracy, and expression with which a student reads connected text.	An effective combination of speed, accuracy, and proper expression (prosody), is

		considered a critical component of reading proficiency and provides diagnostic insights.
Dimensions of Reading Ability	A student's relative strength in the core components of the Reading Rope model: Decoding, Phonological Awareness, High Frequency Words, Background Knowledge, Structures & Reasoning, and Vocabulary	Provides a nuanced, diagnostic profile of a student's reading abilities.
Mastery of Academic Standards and Targets (MAST)	The Mastery of Academic Standards & Targets score tracks student mastery of state-specific, grade-level standards, reflecting the percentage of standards likely mastered on a 0-100% scale.	The MAST helps educators understand how much progress a student or group of students has made towards grade-level mastery based on specific state standards.

1.6 Supporting Multi-Tiered Systems of Support (MTSS)

Amira Tutor/Tutora is specifically designed to enhance MTSS implementation by providing scalable, individualized reading support that complements classroom instruction and targeted interventions. The tutoring system addresses key MTSS challenges while supporting all three tiers of instruction.

MTSS Supports

Tier 1 Universal Support:

- Differentiated practice aligned with core curriculum through text sets
- Independent reading support that extends classroom instruction
- Progress monitoring data using ARM scores to inform whole-class instruction
- Student engagement maintenance between teacher-led lessons
- Access to high-quality texts spanning multiple complexity levels

Tier 2 Targeted Intervention:

- Intensive practice targeting specific skill deficits identified through Skills Diagnostic reports
- Increased instructional time without additional teacher burden
- Consistent intervention delivery regardless of staffing constraints

- Progress monitoring data using Estimated Mastery to evaluate intervention effectiveness
- Automated skill-based grouping recommendations

Tier 3 Intensive Support:

- Highly individualized instruction matching intensive intervention goals
- Frequent progress monitoring using multiple data sources
- Supplemental practice supporting specialized intervention programs
- Comprehensive data collection for compliance and documentation requirements
- Integration with IEP goals and specialized instruction plans

Part 2: Teacher Experience

2.1 Getting Started with Tutor/Tutora

Successfully implementing Amira Tutor/Tutora in your classroom begins with understanding how the system works and preparing both your environment and students for optimal tutoring experiences. This section provides step-by-step guidance for initial setup and implementation using research-based practices.

Resources

[Click here](#) for a comprehensive Implementation Guide for launching Amira, a Launch Checklist for Teachers or follow, and additional resources for getting started with Amira Tutor/Tutora.

Steps for Launching Amira

Step 1: Complete Amira Training

- Attend a [live webinar](#) or complete the self-paced [Getting Started with Amira course](#).

Step 2: Build Your Plan

- Build your tech plan: [Tech Prep Guide](#)
- Decide when and how you will use Amira: [Sample Schedules](#)
- Set weekly usage goals: [Goal Setting & Tracking Resources](#)
- Set up your classroom: [Classroom Resources](#)
- Inform families that students will use Amira: [Family Communication Tools](#)

Step 3: Adjust Tutoring Settings

- Ensure Tutor settings are personalized and appropriate for each student
- [How to: Adjust Tutor Settings](#)

Step 4: Introduce Amira to Students

- Use intro slides and videos to help students learn to read with Amira
- [Introducing Amira Resources](#)

Classroom Integration Strategies

Independent Reading Time:

- Incorporate tutoring sessions into daily independent reading blocks, whether whole group, small group, or individual times.
- Use tutoring as a station in reading workshop rotations

- Provide tutoring access during early finisher activities
- Teach clear systems for headphone use and device management

Targeted Intervention:

- Assign specific students to daily tutoring based on intervention needs
- Use tutoring to supplement small group instruction
- Provide additional practice for students receiving Tier 2 or Tier 3 support
- Monitor progress using ARM scores and Estimated Mastery to inform intervention intensity decisions
- Coordinate with intervention specialists and support staff

2.2 Monitoring Student Progress

Effective implementation of Amira Tutor/Tutora requires ongoing monitoring of student engagement, progress, and outcomes using the comprehensive data sources and reporting tools available through the Growth Dashboard and administrative reports.

Click [here](#) to access a walkthrough of the Growth Dashboard.

Tutor/Tutora Usage Tracking:

- Track progress toward weekly usage goals (~30 minutes per week recommended) through the Tutor/Tutora Weekly Goal widget
- Review which students completed tutoring sessions using Usage Reports
 - Monitor Total Time vs. High Quality Time metrics
 - Total Time = Includes all minutes spent reading with Amira
 - High Quality Time = Includes minutes only from finished stories
- Identify students who may need additional support or motivation
- Click on the Tutor/Tutora Weekly Goal widget to view a more detailed breakdown of usage in the Usage Report
- Click [here](#) to see a walkthrough of the Usage Report

Skills Development Tracking:

- Monitor mastery progression using the Standards Mastery and Skills Status reports
- Track movement from red (not developed) to yellow (developing) to green (likely mastered)
- Identify skills requiring additional focus or instruction using color-coded indicators
- Celebrate student achievements and milestone completion
- Communicate progress with students and families using comprehensive reports

Standards-Based Progress:

- Connection between daily reading practice and grade-level standards
- MAST score tracking showing mastery of academic standards and targets
- Integration with classroom curriculum through text sets and topics
- Alignment with district assessment and accountability systems
- Communication of progress in terms familiar to teachers and families

Long-Term Growth Tracking:

- ARM score progression showing comprehensive reading development
- Skills mastery progression using research-based developmental sequences
- Predictive analytics showing projected end-of-year performance

Intervention Decision Making:

- Use the Reading Risk Report or Benchmark Report to identify students needing additional support
- Use the Skills Diagnostic Report to identify specific skills a student needs additional intervention and instruction with
- Monitor response to Tier 2 and Tier 3 interventions through Estimated Mastery
- Adjust intervention intensity based on progress monitoring data
- Coordinate with support staff using shared progress reports
- Document growth for IEP meetings and parent conferences

2.3 Best Practices for Implementation

Successful implementation of Amira Tutor/Tutora requires thoughtful planning, consistent routines, and ongoing refinement based on student needs and classroom dynamics. These evidence-based practices support optimal outcomes.

Establishing Routines**Daily Implementation:**

- Consistently scheduled time for tutoring sessions embedded into the daily schedule (research shows 10–15 minutes in a day is optimal)
- Clear expectations for session completion and effort
- Established protocols for [device set up](#) and [troubleshooting](#)
- Access Amira support for technical issues: chat with Amira on the Growth Dashboard, ask to speak with a live agent, or email support@amiralearning.com.
- Regular celebration of progress and achievements through Growth Dashboard data
- Integration with existing classroom management systems

Weekly Planning:

- Review usage and progress data regularly using the Growth Dashboard
- Analyze Skills Diagnostic updates and MAST score progressions weekly
- Communicate progress with students and families using comprehensive reports

Monthly Evaluation:

- Comprehensive review of ARM score growth and trajectory analysis
- Assessment of program effectiveness and student engagement patterns
- Adjustments to implementation strategies based on outcome data
- Professional learning and development planning based on classroom needs
- Coordination with intervention specialists and support staff

Creating Supportive Environments

Physical Environment:

- Quiet spaces that minimize distractions during reading sessions
- Comfortable seating and appropriate device positioning for optimal microphone use – space students out, or turn devices so that students are not sitting directly next to each other.
- Headphone availability for focused listening and privacy (headsets with a microphone support optimal use but are not required.)

Social Environment:

- Celebration of reading growth and effort using motivational elements
- Integration of tutoring achievements into classroom community recognition

Part 3: Student Experience

3.1 Overview of Student Tutoring Experience

Students experience Amira as a patient, encouraging reading coach who provides personalized support and celebrates their reading journey. The tutoring interface is designed to be intuitive, engaging, and supportive while maintaining focus on reading skill development through research-based practices.

Typical Tutoring Session Flow

Welcome and Introduction:

When students first access Amira Tutor/Tutora, they are greeted by the Amira avatar who:

- Introduces herself as their personal reading tutor and learning partner
- Explains how the tutoring sessions will work using clear, age-appropriate language
- Sets positive expectations for the reading experience and growth journey

Reading and Support:

- Student reads aloud while Amira listens attentively using advanced speech recognition
- Amira provides real-time assistance with challenging words through micro-interventions
- Amira offers strategic questioning to support comprehension and deeper thinking
- Positive reinforcement for effort and progress using research-based motivation techniques

Session Wrap-up:

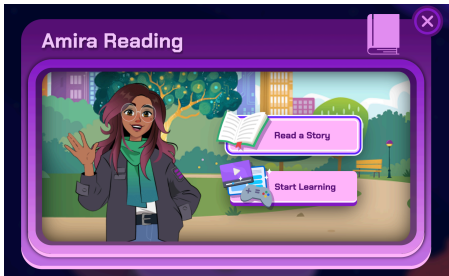
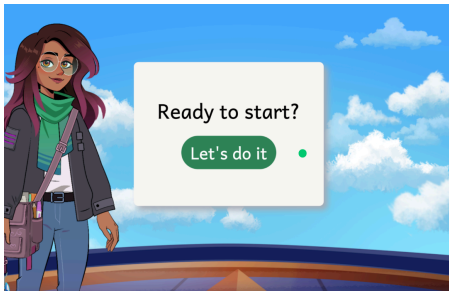
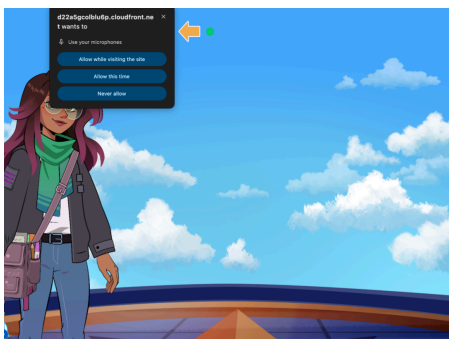
- Celebration of reading accomplishments and skill demonstrations

Reading Cursor and Independent Pace

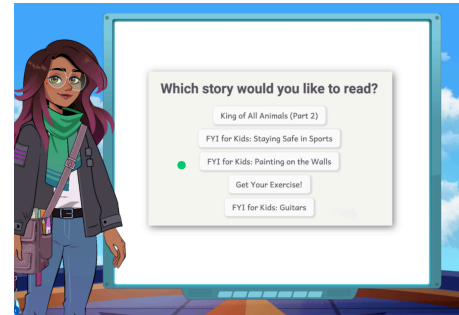
For students reading at or above 75 Words Correct Per Minute (WCPM), Amira will change the on-screen reading cursor. Once a student reaches this fluency level, the real-time word-tracking cursor is removed permanently for that student, and completed phrases gray out instead to show reading progress. In most cases, Amira still automatically advances to the next phrase once the student finishes reading it aloud. If Amira doesn't detect that the student has finished, a "Next" button appears so the student can advance manually. Students below 75 WCPM will see the cursor underline the words as they read. The first time a student

crosses this threshold, they will see a short, one-time message explaining the new experience.

3.2 Step by Step Student Tutoring Experience

Step	Image
When students log in, they will arrive at their Student Inbox. This screen may appear differently depending on the student's grade level. If your students access Amira through HMH Ed, they will bypass the Student Inbox and go directly to Amira's "Ready to Start?" screen. Students will see either a "Reading" panel, a "Lectura" panel, or both depending on their license access and teacher language settings.	
If your district subscribes to Amira Instruct, students may see the options to "Read a story" / "Leer una historia" or "Start Learning" / "Empieza a aprender." To read with Amira Tutor/Tutora, they should click "Read a story" or "Leer una historia." If your district does not use Amira Instruct, students will skip this screen and proceed directly to the next step.	
Students click "Let's do it" or "Vamos."	
Amira will greet the student and prompt them to enable the microphone if it isn't already turned on and connected. For Amira to function properly, microphone access must be granted and the correct microphone must be selected.	

Amira will present the student with a selection of five stories tailored to their instructional level. The student can choose the story they would like to read. For students in the Early Reader Skills Scaffold, students start a phonics activity instead of selecting a story.



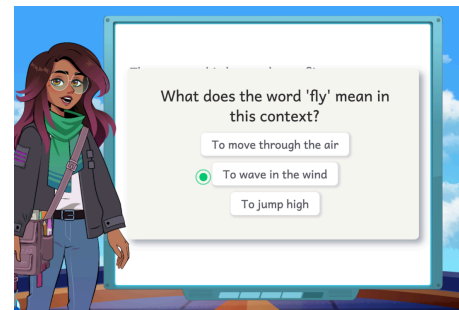
Amira will say “Ready, Set, Go!” / “En sus marcas, Listos, Fuera!” to cue the student to begin reading aloud. The story will show on the screen, and the student can begin reading. Students should wait for the microphone at the bottom of Amira’s screen to turn green before starting to read. Students can read smoothly; they do not need to try to follow the underline. It’s there to support students in case they’re not sure which word they’re on. (Note: students consistently reading at or above 75 WCPM will not see an underline—see Section 3.1.)



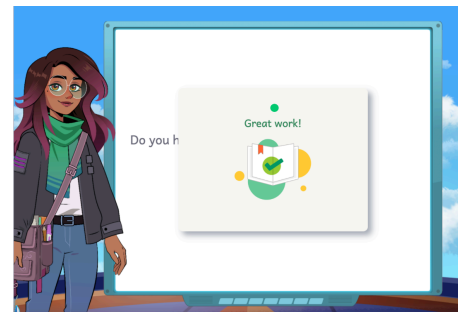
Throughout the reading session, Amira will provide interventions to support and coach the student if they make an error or get stuck. Amira does not intervene for every single miscue; she selects the highest leverage miscues to address in the moment or once the student finishes the sentence.



Amira may offer comprehension questions during or at the end of the story. In stories at third-grade reading level and above, students may encounter open-ended comprehension questions that they are prompted to answer either verbally or by typing their responses.



When the story is complete, Amira will tell the student “Great Work!” and share their speed and accuracy. Students must get to this screen to fully finish the story and in order for their data to save as High Quality Time in teacher reports.



3.3 Accommodations and Accessibility

At Amira, we believe all students deserve access to equitable instructional materials, regardless of culture, background, learning needs, or disability. We are dedicated to providing a program that supports and is accessible to as many students as possible.

Amira adheres to the principles of universal design. The company’s development processes revolve around UDL and Agile/Lean.

Universal design for learning (UDL) works to accommodate the needs and abilities of all learners via eliminating the unnecessary hurdles in the learning process. UDL centers on developing a flexible learning environment in which information is presented in multiple ways, students engage in learning in a variety of ways, and students are provided options when demonstrating their learning. Amira’s UDL process aims for accessible and inclusive instructional approaches that meet the needs and abilities of all learners. The specific goals at the heart of Amira’s design approach are:

- Incorporating universal design principles enhances an [inclusive learning environment](#).
- Designing a course to accommodate a wider variety of needs may eliminate potential learning barriers or unnecessary learning obstacles.
- Providing students with multiple means of perceiving, comprehending, and expressing their learning allows students to engage with the material in a way that most benefits them, and also encourages students to engage with material to improve in areas in which their skills are not as strong.

UDL is about providing options. Optionality supports diversity. Optionality provides pathways to innovation. From the Center For Teaching Innovation:

- Provide Options for Perception – Based on the premise that learners access information differently, this principle means providing flexible and multiple ways to present information.
- Provide Options for Expression – Since learners vary in their abilities to demonstrate their learning in different ways, this principle means providing flexible and multiple ways to allow students to express their knowledge or demonstrate their skills.

- Provide Options for Comprehension – Students are motivated to learn for different reasons and vary in the types of learning activities that keep them engaged. This third principle means providing multiple ways for engaging in course activities.

Built-in Universal Accommodations

Visual Accommodations:

- Highlighting of current reading position for tracking support
- Visual progress indicators and achievement displays for motivation
- Clean, uncluttered interface design to minimize distractions

Auditory Accommodations:

- Clear, natural speech from AI tutor
- Noise filtering and background sound management for focus
- Multiple opportunities to hear instructions or support as needed

Processing Accommodations:

- Repeated instructions and support as needed for understanding
- Chunking of complex texts into manageable sections
- Wait time for student processing and response without rushing

Support for English Language Learners

Language Development Support:

- Vocabulary pre-teaching for key concepts before reading
- Cognate recognition and instruction for Spanish-English connections
- Cultural context explanations for background knowledge building
- Encouragement of bilingual thinking and metalinguistic awareness
- Connection between languages for deeper understanding and transfer

Tutor and Tutora Language Features:

- Spanish-language tutoring through Amira Tutora, licensed separately from Amira Tutor, with culturally responsive content
 - Tutor Language Settings (redesigned for SY 2026–27, Amira Direct customers only—see below)
 - Click [here](#) for a walkthrough of the Tutor Language Settings.

Tutor Language Settings

The Tutor Settings page in the teacher dashboard has been designed for customers to reflect Tutor (English) and Tutora (Spanish) as separately licensed products. This does not apply to HMH districts, which keep their SY25–26 settings.

- "Practice Reading In" is the primary setting for each student and controls which tutor experience(s) they see. Teachers can choose English, Spanish, or English and Spanish, depending on whether the student is licensed for Tutor, Tutora, or both.
- Options the student's license doesn't support appear grayed out. If a student's license changes after a teacher makes a selection, the teacher will see a clear warning in the dashboard.
- "Practice Reading In" controls whether other row settings are editable: Tutor Practice Mode and Tutor Amira Speaks In (both English-product settings) are only interactive if "Practice Reading In" includes English (otherwise they show "N/A"); Tutora Practice Mode is only interactive if "Practice Reading In" includes Spanish (otherwise "N/A"). Seeing "N/A" in these fields is expected, not an error.
- If a student has no Tutor or Tutora license, every field shows "No license enabled" and the dropdowns are disabled. If an entire class has no license, the Tutor Settings tab won't appear for that class at all.
- Students only see the tutor button(s) that match their teacher's "Practice Reading In" setting. If there's a mismatch between that setting and the student's actual license (for example, a teacher selects "English and Spanish" but the student only holds a Tutora license), the student will see a banner noting the mismatch but can still use whichever tutor language their license supports. The banner clears once the teacher updates the setting. A tutor mismatch does not affect the student's access to Assess or Instruct.

Common scenarios:

- "My Spanish student is seeing an English button" — Check the student's "Practice Reading In" setting; if it's already set correctly, contact support@amiralearning.com.
- "The Spanish option is grayed out" — The student isn't licensed for Amira Tutora; check with your account team about licensing.
- "There used to be a 'Student Language' field here" — That field was replaced by "Practice Reading In."
- "Some fields show N/A" — this means that language isn't part of the student's current "Practice Reading In" setting.
- "Why can't I find a combined bilingual license?" — English and Spanish are now licensed separately as Amira Tutor and Amira Tutora. A district that wants both languages licenses both products; contact your account team to add one language or another.

3.4 Student Engagement and Motivation

Amira Tutor/Tutora maintains student engagement through meaningful progress tracking, achievement recognition, and motivational elements that celebrate growth and effort rather than just final outcomes, supporting intrinsic motivation development.

Click [here](#) to access Classroom Resources for Progress Tracking and Motivation

Motivational Elements

Badging:

Amira's Badging system is designed to motivate and celebrate student progress through positive reinforcement. As students read with Amira and demonstrate growth in key areas—such as accuracy, fluency, stamina, and comprehension—they earn digital badges that mark their achievements. These badges are thoughtfully aligned with research-based reading milestones and provide students with a sense of accomplishment and purpose. [Learn more about badging here.](#)

Achievement Recognition:

- Immediate celebration of reading successes and effort demonstration at the end of every story
- Badging systems for various accomplishments including persistence and growth
- Personal best recognition and encouragement for continuous improvement

Growth Mindset Development:

- Emphasis on learning and improvement rather than fixed ability
- Celebration of mistakes as learning opportunities
- Recognition of different types of progress and achievement
- Encouragement of challenge-seeking and persistence
- Connection between effort and outcomes for motivation

Student Agency and Choice

Reading Autonomy:

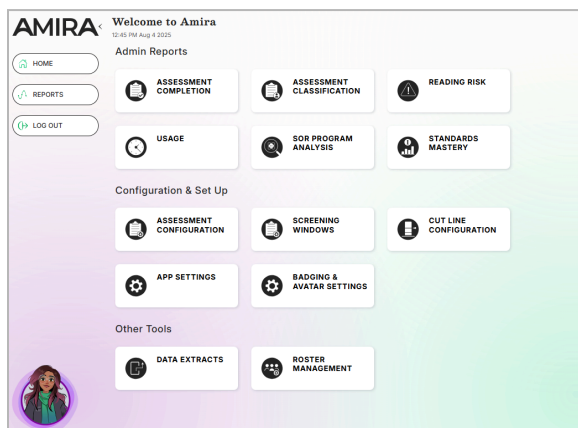
- Choice in text selection within appropriate levels based on interests
- Opportunities to express reading preferences and goals
- Ownership of personal reading journey and goal-setting

Part 4: District Configuration Settings and Administration Experience

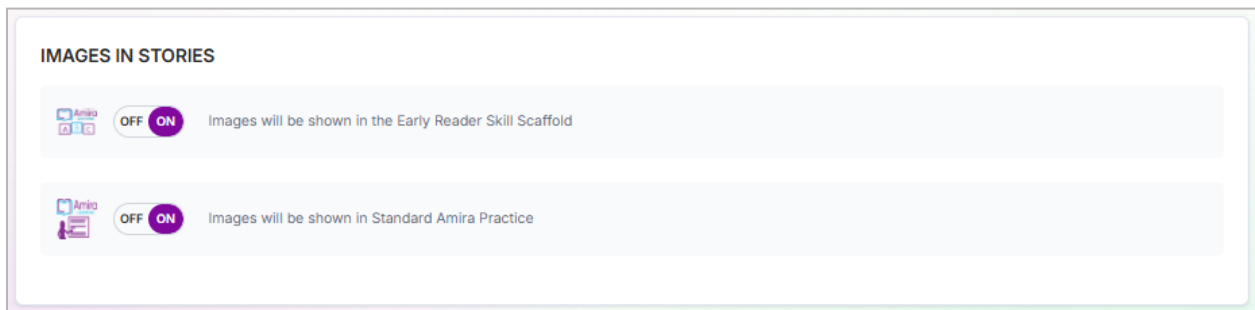
4.1 Tutor/Tutora App Configuration Settings

Amira's Tutor/Tutora features can be customized to meet district needs. District and School administrators have the ability to configure the Tutor/Tutora App settings. Use this [walkthrough](#) or follow these steps.

1. From the Amira Admin Dashboard, click **App Settings**.



2. **Images in Stories:** Turn images in stories on or off for students in the Early Reading Skills Scaffold and Standard Amira Practice. Settings will apply to both the Tutor and Tutora experiences.



3. **Intervention Frequency:** Select between the following options:

- High – Amira will intervene frequently
- Standard – Amira will intervene at a normal rate
- Low – Amira will intervene infrequently

Settings will apply to both the Tutor and Tutora experiences.

INTERVENTION FREQUENCY

Choose how often you'd like Amira to intervene during Standard Amira Practice

Standard - Amira will intervene at a normal rate during p... ▼

4. **Giveword Intervention:** Enable this option to allow Amira to use the Giveword intervention during practice in Tutor and Tutora. This tutoring technique simply provides the correct word to the student when needed.

GIVEWORD INTERVENTION

☐ OFF ☒ ON Enables the giveword intervention as a tutoring technique during practice, which gives the reader the word.

5. Under **Reporting Settings** select your state standards.

CONFIGURE REPORTING

CHOOSE STANDARD USED IN REPORTING

Common Core ▼

Amira will show Common Core standards associated with skills in reports.

6. Select your **curriculum for reports** in English and Spanish. For English, if you don't see your curriculum, select Amira Default. For Spanish, choose from Currículo General de Amira (Amira Default), Benchmark Adelante, or Aprendizaje Bluebonnet (Foundations or RLA)..

CHOOSE CURRICULUM AVAILABLE IN REPORTS

Amira will show the selected curriculum's scope and sequence in skills reports.

Choose Curriculum for English

Amira Default ▼

Choose Curriculum for Spanish

Amira Default ▼

7. Enable **DRA scales** to display in reports. Note: These levels are based on a concordance with the DRA scale and apply only to the Oral Reading Fluency (ORF) passage.

CHOOSE SCALES USED IN REPORTING

The following scales will be available in Amira reports:

☐ DRA

8. Enable **Fountas & Pinnell (F&P) reading levels** to display F\&P reading levels in the Benchmark Report. Note: These levels are based on a concordance with the F\&P scale and apply only to the Oral Reading Fluency (ORF) passage.

F&P READING LEVEL ON REPORTS

☒ OFF ☐ ON

Amira will show the F&P reading level on the Benchmark Report

9. Enable teachers to record self-corrections, skips, and mistakes in the **Review Activity** screen.

SHOW EXTENDED COLUMNS IN TRANSCRIPTS

☒ OFF ☐ ON

Amira will show the self-corrections, skips, and mistakes columns on the Review Activity screen

10. Remember to **Save Changes** at the bottom of the screen to save your configuration selections.

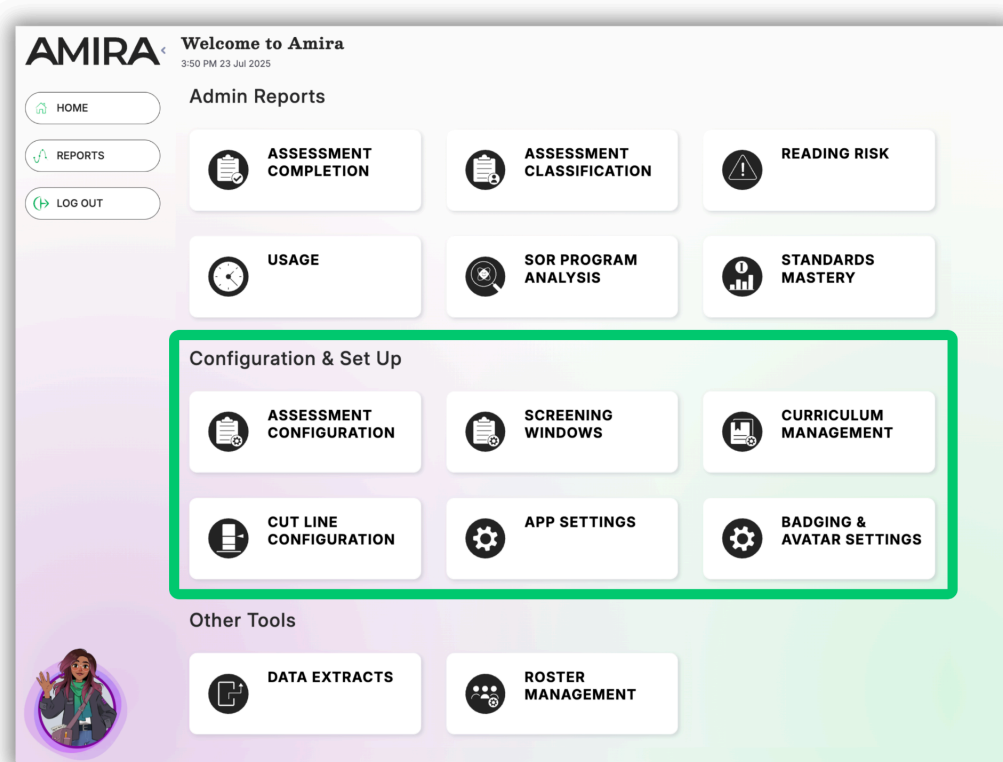
Syllable Intervention ARM Threshold (Tutora)

Districts that want Amira Tutora to lean more heavily toward syllable-based Spanish interventions (rather than the default mix of phoneme- and syllable-based support) can request an adjustment to the Syllable Intervention ARM Threshold, which defaults to 1.5. This is not a self-service Admin Dashboard setting—contact your Customer Success Manager to request a change; the threshold can be lowered to as low as -1. See Section 1.4 and the Intervention Encyclopedia for more on Amira Tutora's intervention experience.

4.2 District Configuration Tools

The Admin Dashboard is the central hub for district and school leaders to oversee reading progress, monitor usage, and ensure the effective implementation of Amira. From this

dashboard, administrators can configure settings at the district or school level and access comprehensive Amira data spanning districts, schools, classes, grades, and individual students.



View the [Admin Dashboard Setup Guide](#) for information on how to use each tile and to view step-by-step walkthroughs.

Cut Line Configuration

Administrators can select from multiple cutline models that define how proficiency levels appear in both administrator and teacher reports. These models vary in the number of tiers, the percentile ranges used to classify student performance, and the color schemes that visually represent student placement within the selected tiered framework. View a [step-by-step walkthrough](#).

Cut Line Configuration

6:07 PM Aug 2 2025

[Save Changes](#)

Intervention Tiers

[Turn On](#)

Label	Starting PR	Ending PR	Color
Tier 3	1	20	■ Red
Tier 2	21	40	■ Yellow
Tier 1	41	99	■ Green

Badging and Avatar Settings

Administrators can enable or disable student badges during Amira Tutor/Tutora sessions and can manage avatar customization options. Admins can choose which avatars are available and whether students can change them. View a [step-by-step walkthrough](#).

ENABLE/DISABLE BADGING

[OFF](#) [ON](#) Students will earn badges during practice with Amira. Teachers can award badges and create custom certificates using the Badging Report.

AVATAR SETTINGS

[OFF](#) [ON](#) Allow students to change their avatar during practice sessions.

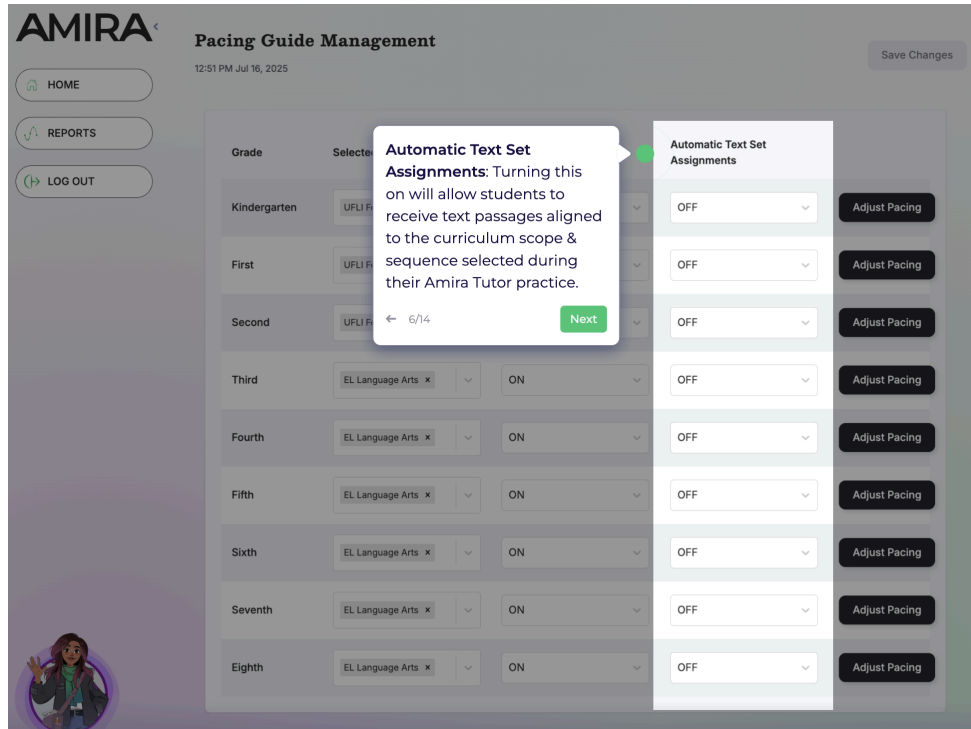
Available Avatars:

Amira Classic [x](#)
Amira New [x](#)

[Save Changes](#)

Curriculum Management

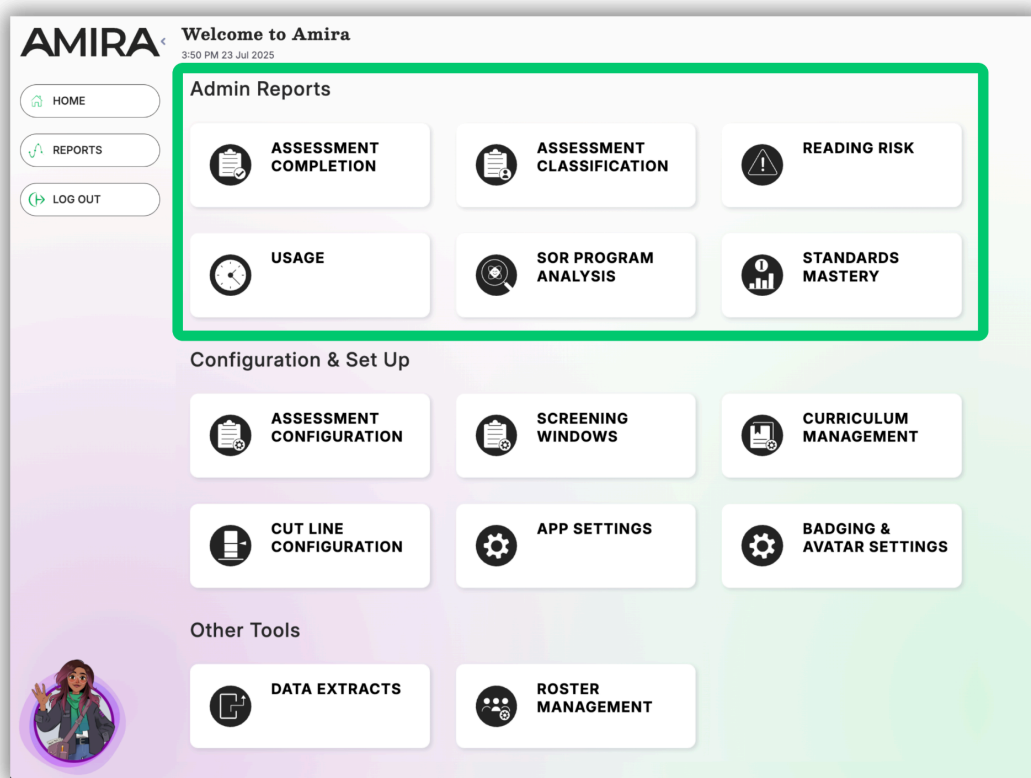
Administrators can enable text sets from the Curriculum Management tile. View a [step-by-step walkthrough](#).



4.3 District Reporting Tools

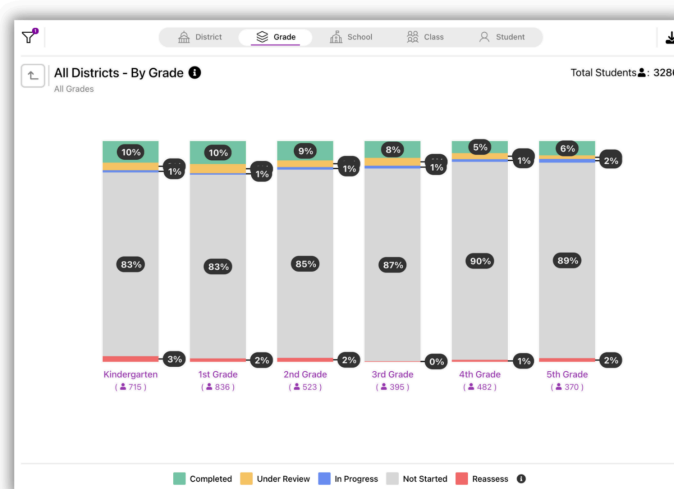
The Admin Dashboard hosts six key reports that enable administrators to monitor assessment completion, review results, evaluate reading risk district-wide, and analyze student performance and standards mastery.

View the [Administrator Reporting Guide](#) for information on how to use each tile and to view step-by-step walkthroughs.



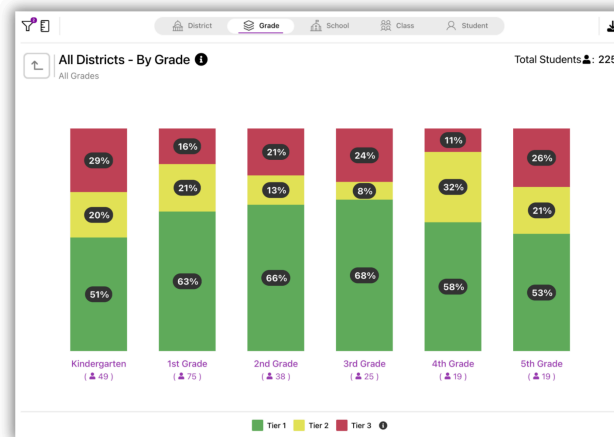
Assessment Completion Report

The Assessment Completion Report provides administrators with a clear overview of student assessment status. By tracking the status of benchmark and progress monitoring assessments across different time periods, this report helps educators quickly identify which students have completed their required assessments and who still needs to be assessed or reassessed.



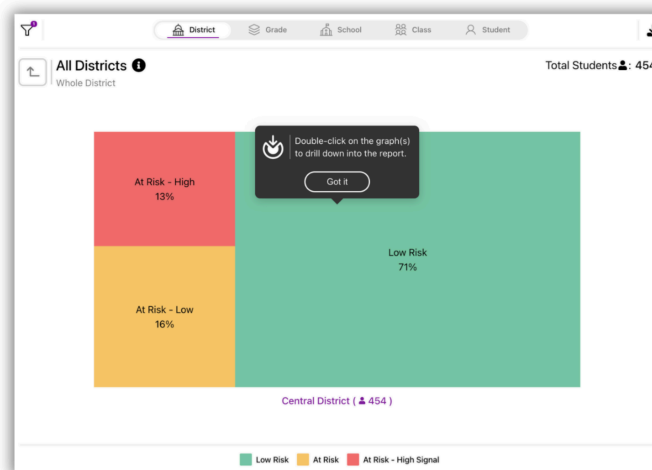
Assessment Classification Report

The Assessment Classification Report offers a comprehensive view of student performance across achievement tiers. The report includes flexible tiering options and allows administrators to select from multiple measures, such as ARM (overall reading mastery) and domain subscores. Educators can easily review classification outcomes at the district, school, and class levels, pinpoint areas for improvement, and analyze assessment results to support instruction and intervention.



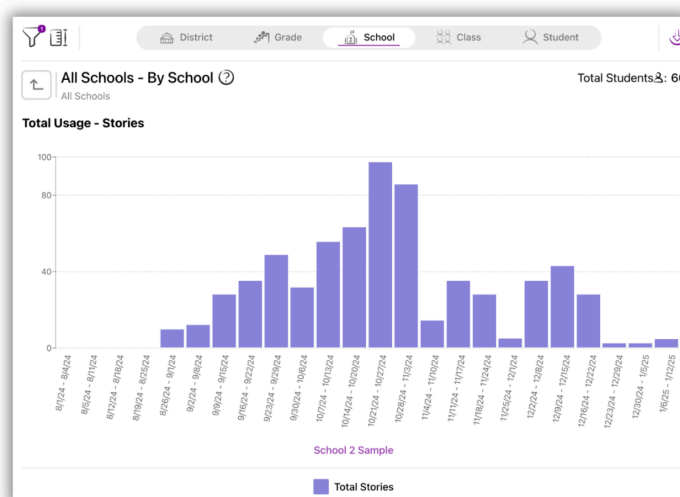
Reading Risk Report

The Reading Risk Report provides administrators with a district-wide overview of students' reading risk levels, helping to identify those who may be at risk for reading difficulty including dyslexia. The report equips school leaders with key data to assess students' need for early intervention, further testing, and additional support for at-risk readers.



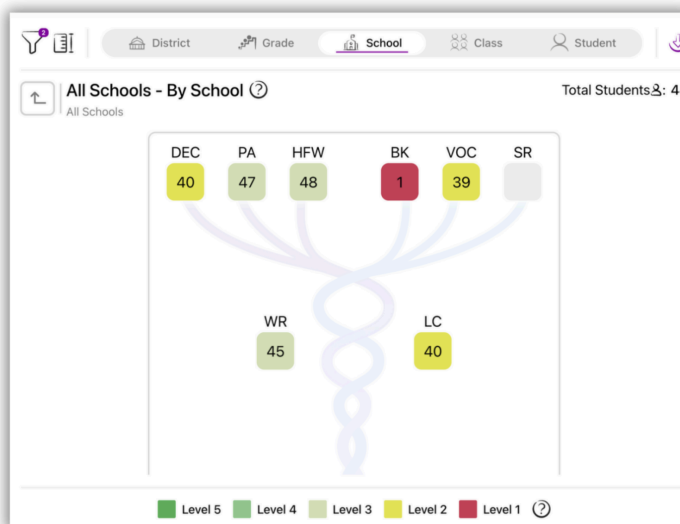
Usage Report

The Usage Report provides educators with a snapshot of students' weekly engagement with Amira, tracking progress towards recommended usage goals. This report displays the percentage of students meeting target usage along with total usage data to help administrators monitor implementation effectiveness.



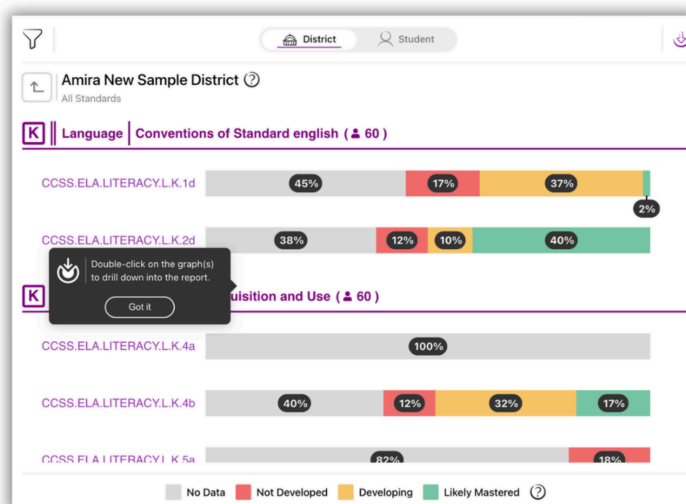
Science of Reading Program Analysis Report

This report helps administrators visualize district-wide reading proficiency using Scarborough's Reading Rope framework. It combines six core reading dimensions—phonological awareness, decoding, high frequency words, vocabulary, background knowledge, and reasoning—to produce word recognition, comprehension, and overall mastery scores. Educators can use the report to pinpoint strengths and target areas for instructional improvement.



Standards Mastery Report

The Standards Mastery Report offers administrators a detailed view of student proficiency across state reading standards at the district, school, class, and individual student levels by grade. Using a criterion-referenced approach, this report helps educators evaluate reading mastery, identify trends, and pinpoint areas requiring additional support.



Assessment Growth Report

(Configurable by Success Manager)

The Assessment Growth Report allows administrators to view growth between assessments by presenting ARM Scores, Percentile Ranking, Tier, and Estimated Mastery for every student in each assessment period. This report also offers “suspicious audio” alerts to aid administrators in flagging possible reassessment needs.

The screenshot displays the 'Assessment Growth Report' for 'Dahlberg Practice Demo District - By Student'. The table shows performance data for 10 students, including School, Class, Grade, Last Name, First Name, MOY Score, MOY PR, and MOY Date.

School	Class	Grade	Last Name	First Name	MOY Score	MOY PR	MOY Date
Dahlberg Practice Demo District	2nd	2nd Grade	Student	2nd1	2.54	45	02/11/2026
Dahlberg Practice Demo District	2nd	2nd Grade	Student	2nd12	3.92	88	12/02/2025
Dahlberg Practice Demo District	2nd	2nd Grade	Student	2nd2	4.47	93	02/16/2026
Dahlberg Practice Demo District	2nd	2nd Grade	Student	2nd3	4.78	98	02/18/2026
Dahlberg Practice Demo District	2nd	2nd Grade	Student	2nd30	3.9	85	01/05/2026
Dahlberg Practice Demo District	2nd	2nd Grade	Student	2nd31			
Dahlberg Practice Demo District	2nd	2nd Grade	Student	2nd32			
Dahlberg Practice Demo District	2nd	2nd Grade	Student	2nd33			
Dahlberg Practice Demo District	2nd	2nd Grade	Student	2nd36	3.4	74	01/05/2026
Dahlberg Practice Demo District	2nd	2nd Grade	Student	2nd39	2.47	46	01/13/2026

Impact Report

(Configurable by Success Manager)

The Impact Report graph compares reading growth (measured in weeks of ARM score improvement) between students who meet Amira's recommended usage targets and those who don't, showing whether higher engagement with Amira leads to faster reading development. Dotted lines project future growth if students continue on their current usage trajectory.



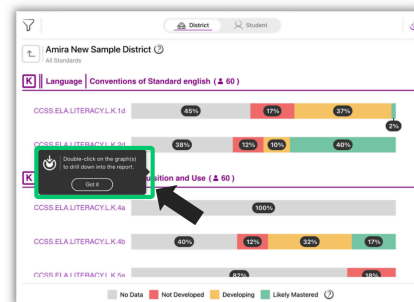
4.4 Navigating Administrator Reports

The administrative reports enable administrators to seamlessly explore student data. A consistent navigation approach including drilldowns, tabs, and filters allow for flexible movement from a district-wide overview to specific grade, school, or classroom insights. This clear, multi-level view helps educators quickly pinpoint areas of need, identify trends, and make timely, data-informed decisions to better support student success.

Feature	Image
---------	-------

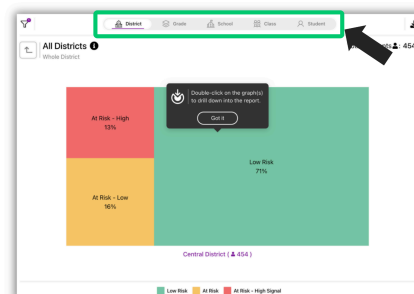
Drilldown

The drilldown feature offers quick access to three levels of data, beginning with the Whole District view. From there, administrators can double click on the graph to drill down to see all schools, and then double click again to explore all classes within a selected school.



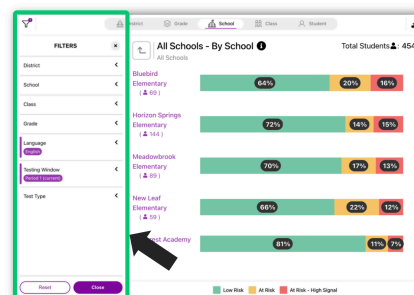
Tabs

The tabs serve as shortcuts, allowing administrators to jump directly to district, grade, school, class, or student views. From the district, grade, or school views, users can drill down further for school or class views.



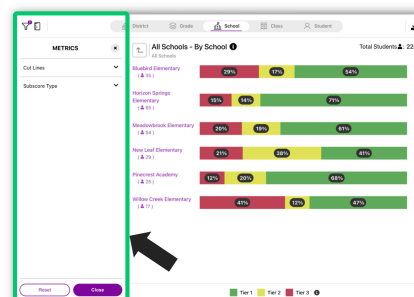
Filters Menu

The Filters Menu gives administrators control over how data is displayed, helping them quickly zero in on the information that's most relevant. Filters allow educators to narrow the data by specific groups such as school, class, grade level, language, test type, and testing window. For example, you can view results for one grade level across select schools or focus on a specific test period like the EOY Benchmark.



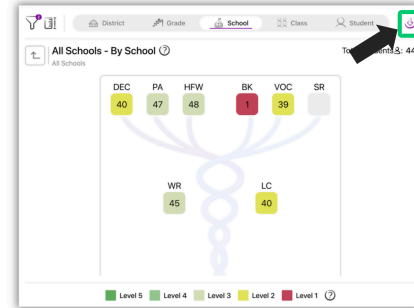
Metrics Menu

The Metrics Menu enables administrators to customize the metrics displayed in their reports. By selecting different cutline models or subscore types, they can focus on the data most relevant to their goals and priorities.



Export Data

Each report allows administrators to export the displayed data as a CSV file, enabling them to save, sort, and analyze the information in greater depth. This functionality supports a deeper understanding of large data sets and helps track progress toward school and district-wide goals.



Demographics Filter

The Demographics filter in Administrative Reports allows school and district leaders to monitor student performance and usage data through the lens of student subgroups. Administrators can apply these filters when exploring reports, allowing them to answer questions like:

- Are certain demographic groups making faster or slower progress than others?
- Are current instructional models serving specific groups effectively?

Demographic importing allows administrators to add student demographic information to existing student accounts. The import supports a variety of optional fields such as:

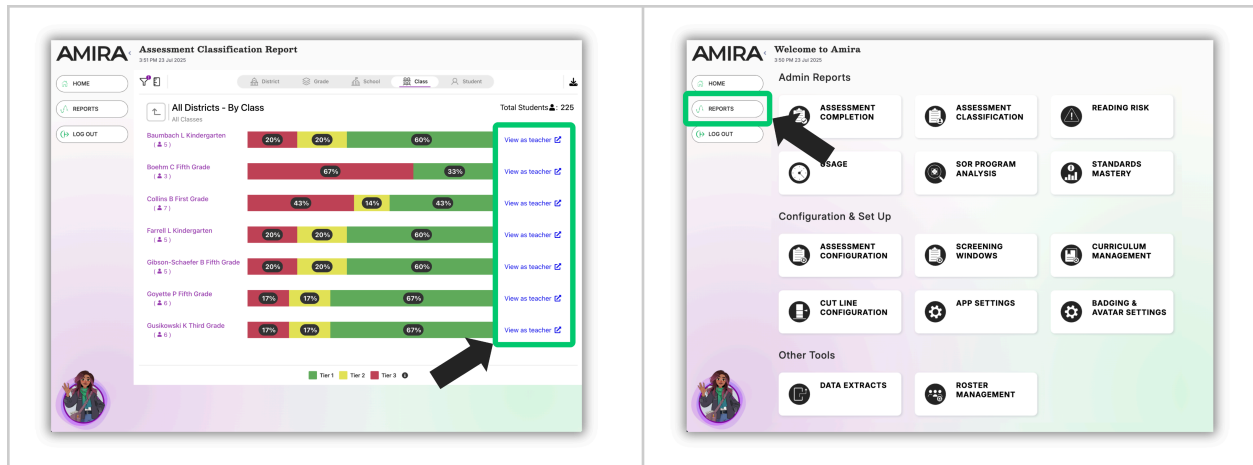
- Gender
- Race
- Special Education
- Class Instructional Type
- Economically Disadvantaged
- English Proficiency
- Disability

To enable demographic filtering, administrators will take the following steps:

- Export student data from the district's Student Information System
- Include required fields including Student ID and Campus Code
- Use Amira's Demographic Import Template
- Upload the completed file through Amira Import and Rostering
- Source: <https://help.amiralearning.com/s/article/Demographic-Importing>

Accessing Teacher Reports

Administrators can easily access and view Teacher Reports in two ways. They can either click on quick links available within select administrative reports, such as the Assessment Classification Report, or navigate to the Reports button in the global navigation bar on the Dashboard.



Part 5: Reports and Data

5.1 Overview of Teacher Reports

Teachers can and do utilize all of Amira's reports for instructional decision making. Educators describe using our reports for determining access to intervention services, identifying skill and instructional gaps, and providing skill-specific instruction to every student as they grow as readers.

Understanding Amira's Mastery Model

Amira's reporting system is powered by an AI-driven, probabilistic mastery model that tracks students' skill development across the components of Scarborough's Reading Rope. Rather than measuring reading ability in broad strokes, it evaluates skill-by-skill progress and estimates how likely it is that a student has mastered a particular reading skill. This model is continuously updated using data from all student activity within Amira—including assessments, tutoring, and instruction—to deliver an individualized profile that highlights each student's strengths and needs.

Key Benefits of the Mastery Model:

- Precision: Identifies granular skill gaps to target instruction
- Personalization: Powers individualized reading plans
- Responsiveness: Adapts quickly as new student data arrives
- Acceleration: Enables focused teaching that drives rapid reading growth

When considering learning opportunities for groups of students, many teachers turn to the Skills Status Report. They can easily identify skills students need to practice or receive explicit instruction in to move towards mastery. The color coding and drag and drop feature makes it easy for teachers to find gaps, form small groups, and plan lessons to support students using the Red-Yellow-Green-Grey (RYGG) status system:

- **Red:** Not Developed – significant instruction needed
- **Yellow:** Developing – continue current instruction
- **Green:** Likely Mastered – ready for next level
- **Grey:** Unknown – needs assessment data

The true power of the Skills Status Report is the continual updating of the data; every time a child reads with Amira the data is updated to reflect the most recent reading experience, and this is reported down to the phoneme and skill level. Teachers are able to see exactly how well a child is reading and specifically target their instruction to provide the most

effective tools for growth. Alongside the skills mastery data, Amira provides the teacher with a transcript and a recording of the child reading with Amira. This allows teachers to pair the wealth of data with the nuance of listening to a child read to really understand and teach against their literacy gaps.

Schools deploy these tools in Multi-Tiered System of Supports (MTSS) meetings, Professional Learning Communities, and other support systems. Educators and families can partner alongside the data to build a true understanding of a student's literacy gaps and the next steps required of everyone to support the student's growth. The information provided through Amira Learning allows these teams to be deeply focused on actionable teaching of skills and providing valuable support to all children learning to read.

For instruction and intervention of individual students, most teachers consider the Instructional Recommendations Report, Skills Diagnostic Report, or Standards Mastery Report. These reports allow teachers to identify gaps for a specific student based on their standards and the pillars of the Reading Rope. As mentioned earlier, these reports can provide a window into the reading gaps of the student and resources for teachers to use in their instruction. All the resources are aligned to Science of Reading interventions and focus on explicit instruction for students to be paired with significant reading practice. As instructional teams consider the Skills Diagnostic Report, they can clearly see the skill gaps informing a child's reading ability and create meaningful instruction and intervention plans to support the student's growth in skill and overall reading mastery. See an overview of all Teacher Reports in the [Teacher Reports Reference Guide](#).

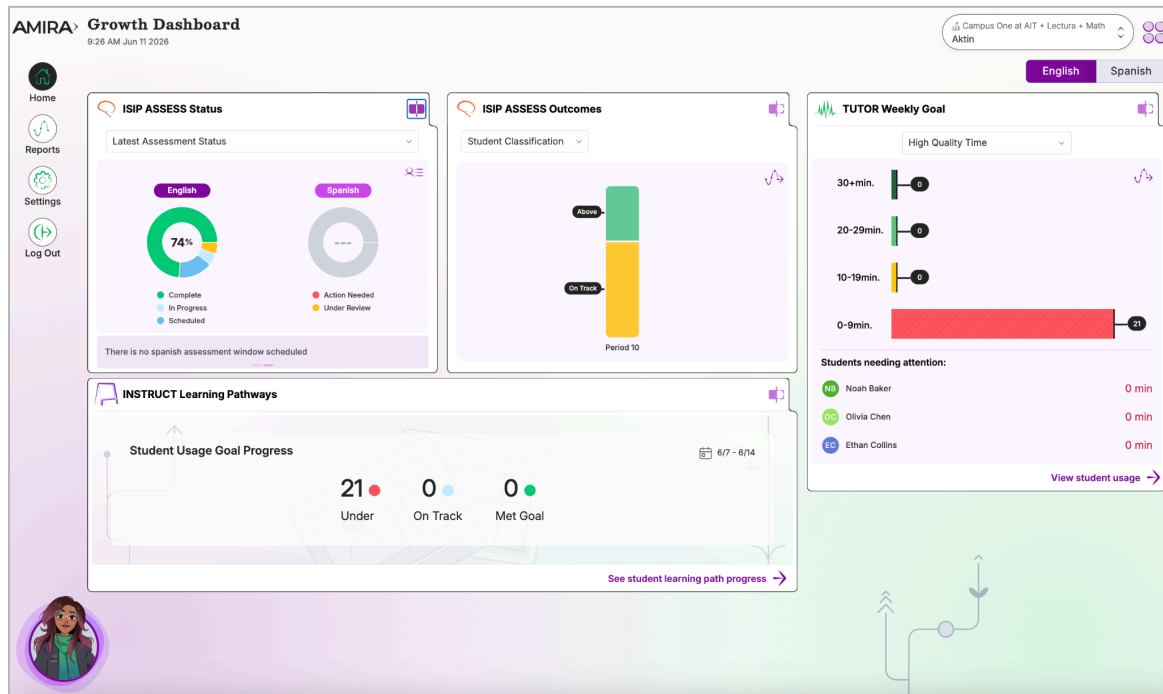
5.2 Growth Dashboard

The Growth Dashboard is your AI-powered command center for reading instruction – bringing together assessment data, lesson planning, and progress monitoring into one intuitive interface. It transforms complex student data into clear, actionable insights that help teachers make informed decisions, fast.

At its core, the Growth Dashboard empowers educators by answering three critical questions: Who needs support, what kind of support they need, and when they need it. With at-a-glance visuals and streamlined access to key data and reports, teachers can quickly identify student needs, manage classroom activities within Amira, and adjust instruction with confidence. It's everything a teacher needs to drive growth, all in one place.

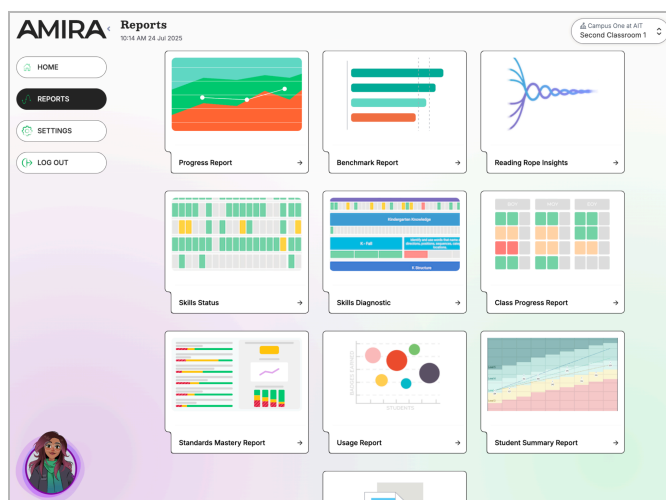
The Growth Dashboard displays student data for both English Tutor and Spanish Tutora. Teachers can toggle between the languages or view both languages side-by-side.

Click [here](#) for a walkthrough of the Growth Dashboard.



5.3 Teacher Reports

At Amira Learning, our mission is to equip educators with timely, meaningful reading data for every student whenever they need it. The Growth Dashboard offers access to eleven comprehensive reports, enabling teachers to quickly assess each student's strengths and growth areas. With these insights at their fingertips, educators are empowered to deliver targeted support where it matters most.



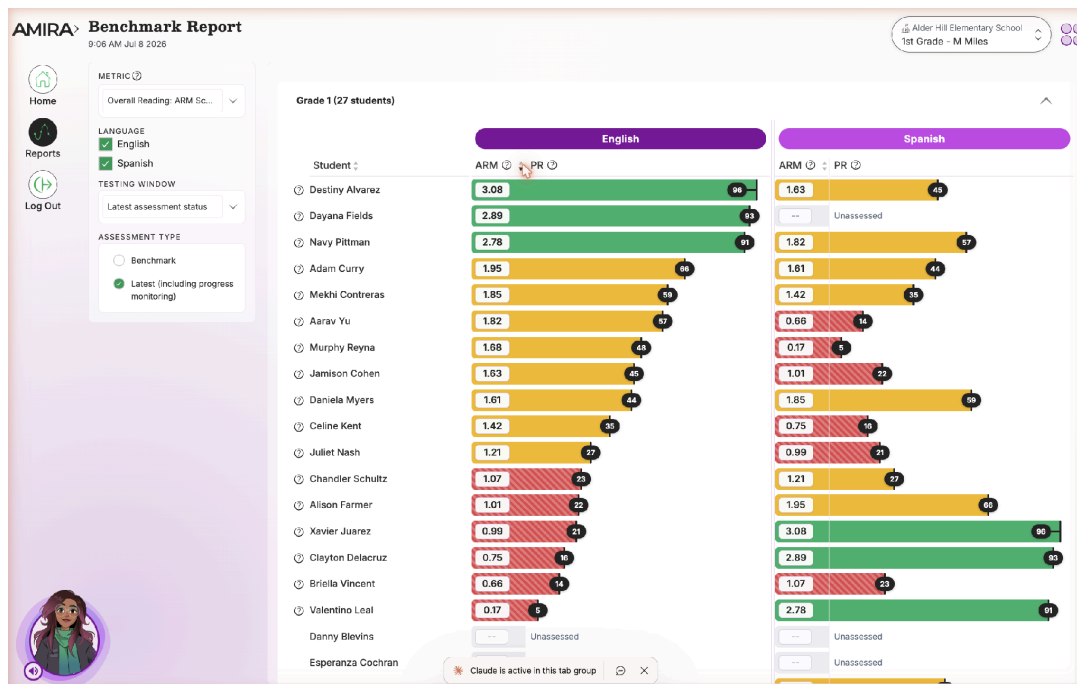
Benchmark Report

The Benchmark Report provides teachers with a clear, side-by-side snapshot of their students' assessment results making it easy to compare performance across the class and against national norms.

Teachers can customize the view using filters on the left side of the screen, selecting the desired metric, language, testing window, and assessment type to tailor the report to their instructional needs.

For districts that hold both an English (Assess) and Spanish (Evaluar) assessment subscription, the Language filter now uses checkboxes instead of radio buttons. Checking both English and Spanish puts the report into dual language mode, showing a student's English and Spanish benchmark results side by side in clearly labeled columns—making it easy to spot students who are strong in one language but still developing in the other. If a student has data in only one language, the other language shows an "Unassessed" state, and at least one language must always stay checked. In dual language mode, you can sort by Student or by either language's score column, and the pending-assessment and mismatch icons account for both languages (for example, the pending icon appears if either language has a pending assessment). HMH districts do not have access to the dual language view.

Click [here](#) to learn more about the Benchmark Report.

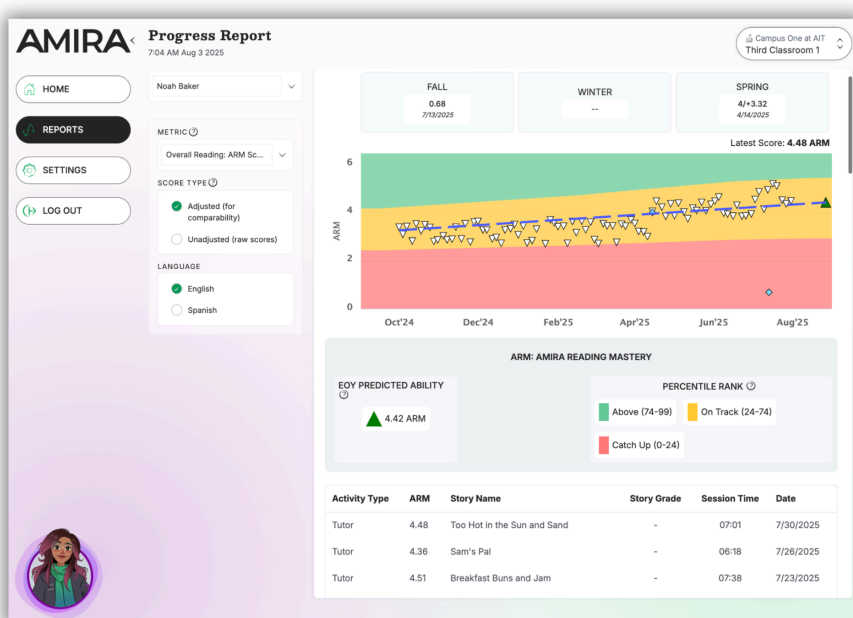


Progress Report

The Progress Report gives teachers a clear view of each student's reading journey, highlighting both overall growth and projected growth. Every reading session a student completes with Amira, whether practice or assessment, is plotted on an individualized growth chart, accompanied by a projection line that shows how the student is progressing toward their reading goals.

Below the chart, a complete list of all stories read, including Oral Reading Fluency passages from assessments, is provided. Teachers can click on any story to view a transcript and listen to a recording of the student's reading.

Teachers can toggle between English and Spanish to view stories read in either language. Click [here](#) to learn more about the Progress Report.



AMIRA Back Review Activity Campus One at AIT Third Classroom 1

HOME REPORTS SETTINGS LOG OUT

Scoring Noah Baker's Practice On 7/30

Correct Incorrect Not Read Flagged Errors

		Totals	Errors
1	Ben sat on the sand.	2	0
2	It was too hot. He got up.	0	0
3	He got a mat. Now Dan can sit on the sand.	0	0
4	Ben had a nap in the sun.	0	0
5	He got hot and red. He had a swim.	3	0
6	Then Ben was not hot. But he was still red!	0	0
7	My dog digs in the sand. I slip some water.	2	0
8	My dog digs in the sand. I jump in the water.	1	0
9	My dog and I like it when it is hot.	0	0

0:00

Status

COMPLETE

Accuracy 90%
Adjusted WCPM 69
Adjusted Read Time 1:26
ARM Score 4.48

Questions?

How do I change a word's score?

Parent Report

The Parent Report mirrors the Progress Report with a clear graph showing the passages a student has read alongside a personalized projection line. What sets it apart is its focus on helping families make sense of the data.

Designed with caregivers in mind, the report explains each student's reading progress in accessible terms and offers tailored, actionable suggestions for supporting learning at home. These recommendations align with the child's specific needs and are grounded in activities that parents can easily implement.

Click [here](#) to learn more about the Parent Report.

AMIRA Parent Report 2:58 PM Jul 9, 2025 Campus One at AIT Second Classroom 1

HOME REPORTS SETTINGS LOG OUT

Olivia Chen

METRIC Overall Reading: ARM Score

SCORE TYPE Adjusted (for comparability) Unadjusted (raw scores)

LANGUAGE English Spanish

TESTING WINDOW Period 11

ASSESSMENT TYPE Benchmark Latest (including progress monitoring)

CONFIGURATION Show Subscores Show Tips

Olivia Chen's Overall Reading Mastery

Print Language En... Batch Print

The Amira Reading Mastery (ARM) score shows the grade level at which Olivia is reading independently.

The 4 to the left of the decimal represents a fourth grade reading level. The 11 to the right of the decimal indicates the first month of the school year.

4.11 ARM

Scored better than 80% of students

ARM

ASU

Sep '24 Nov '24 Jan '25 Mar '25 May '25 Jul '25

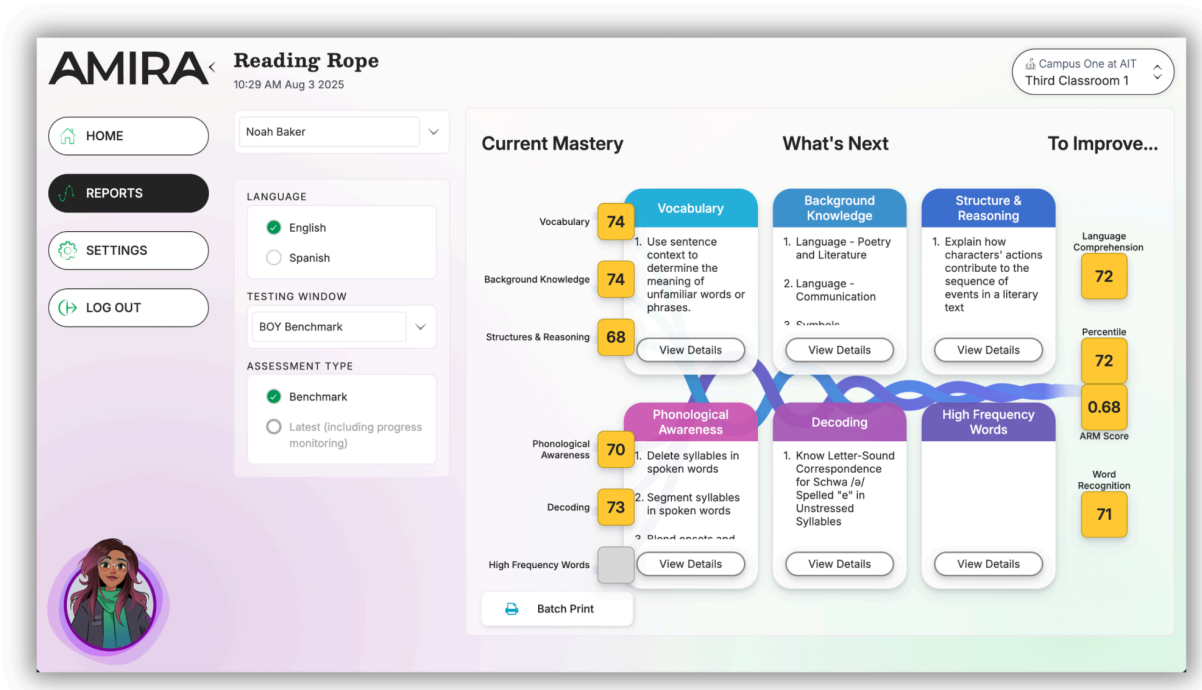
Above On Track Catch Up

Reading Rope Insights Report

The Reading Rope Insights Report offers teachers a comprehensive, at-a-glance view of a student's reading abilities through the lens of the Reading Rope framework. It displays the student's percentile rankings across six core components, which are then synthesized into overall scores for Language Comprehension and Word Recognition. In addition to these summary insights, the report includes the student's ARM Score and ARM Score Percentile Ranking, giving educators a broader measure of reading performance.

Teachers can also access instructional recommendations and targeted strategies tailored to each student's needs. For a deeper dive into skill mastery, clicking "View Details" opens the Skills Diagnostic Report, which provides a granular breakdown of specific strengths and gaps.

Click [here](#) to learn more about the Reading Rope Insights Report.



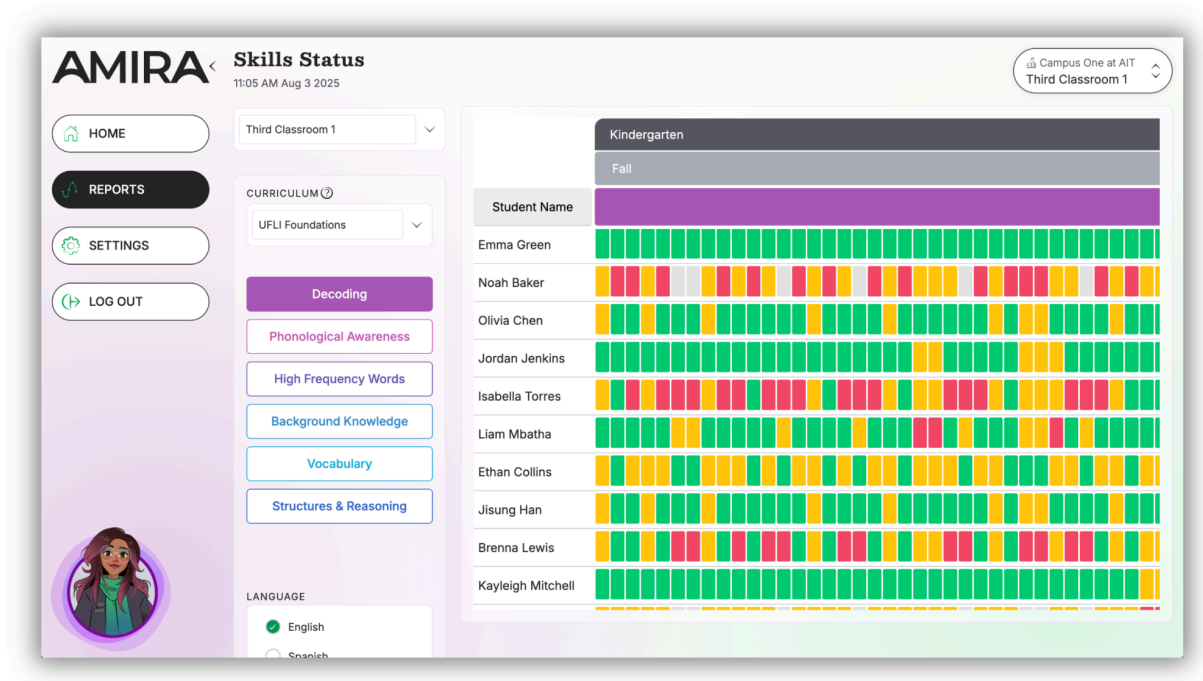
Skills Status Report

The Skills Status Report gives teachers a comprehensive view of skill mastery across the entire class, spanning standards from Pre-K through 8th grade. Teachers can focus on any Reading Rope component by selecting it from the lefthand menu, tailoring the view to specific instructional goals.

Each box in the grid represents an individual skill, with color coding that reflects the student's level of mastery. Hovering over a box reveals a description of the skill, its aligned standard, and the number of observations and errors Amira has recorded. Clicking on a box opens the same detailed view, along with instructional resources to support targeted teaching.

Teachers can also drag and drop student names to reorganize the list—ideal for forming reading groups or comparing student performance. The report updates automatically based on data collected from every Amira reading session, whether practice or assessment.

Click [here](#) to learn more about the Skills Status Report.

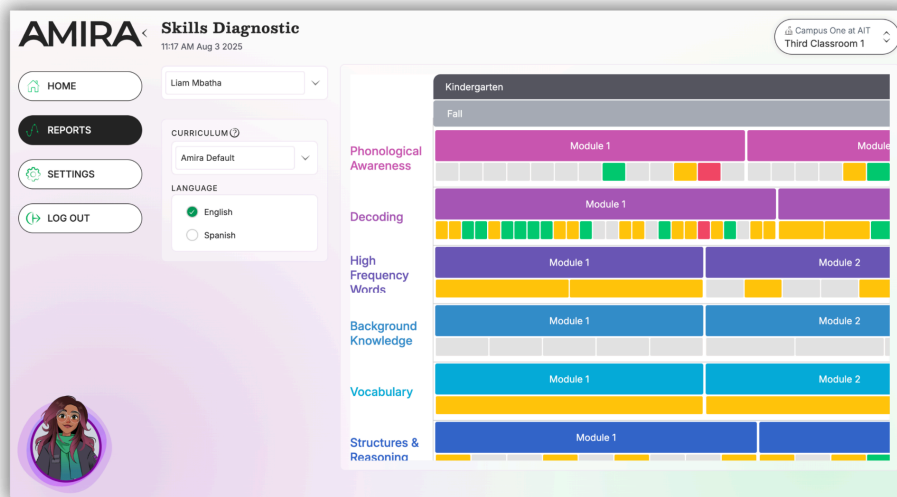


Skills Diagnostic Report

The Skills Diagnostic Report provides a detailed, student-specific view of skill mastery across all components of the Reading Rope in a single, easy-to-navigate screen.

Each box in the grid represents an individual skill, color-coded to indicate the student's level of mastery. Hovering over a box reveals the skill description, the associated standard, and the number of observations and errors recorded by Amira. Clicking on a box opens a deeper view, including access to instructional resources that support targeted skill development.

Click [here](#) to learn more about the Skills Diagnostic Report.

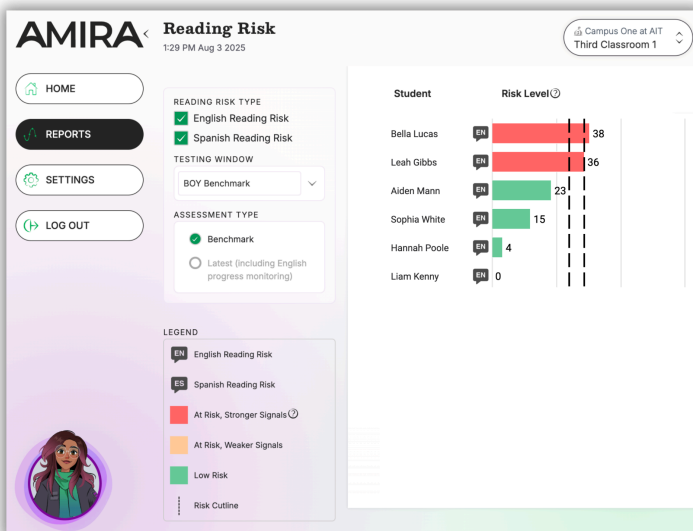


Reading Risk Report

The Reading Risk Report gives teachers an overview of students' risk levels for reading difficulties, including potential indicators of dyslexia. Drawing from the rich data captured by the Amira ISIP Assessment, the report generates a Dyslexia Risk Indicator (DRI) score for each student. This score helps educators quickly identify students who may require additional screening, targeted intervention, or support. Students with a DRI score of 30 or higher are classified as At Risk, while scores below 30 are considered Low Risk.

While Amira does not diagnose dyslexia, the Reading Risk Report is a valuable early-warning tool that flags students who may benefit from further evaluation and support.

Click [here](#) to learn more about the Reading Risk Report.

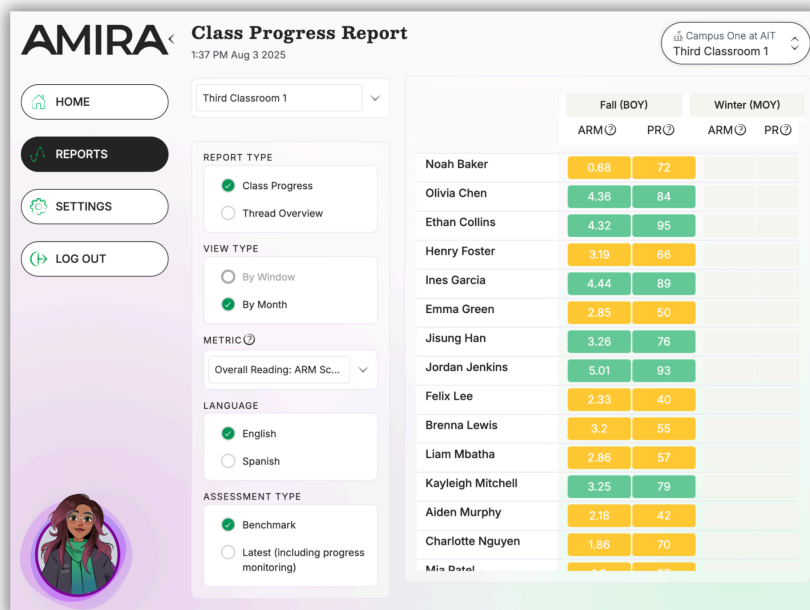


Class Progress Report

The Class Progress Report allows teachers to view and compare benchmark assessment scores for all students in a class, all in one place. Teachers can choose to display progress by monthly assessments or by assessment windows, making it easy to track growth over time. The report displays each student's ARM Score and Percentile Ranking, and offers a toggle to the Thread Overview, which breaks down the latest assessment results by Reading Rope strand.

This report supports a high-level view of class-wide performance, helping educators monitor student progress and identify trends and growth across the school year.

Click [here](#) to learn more about the Class Progress Report.



Usage Report

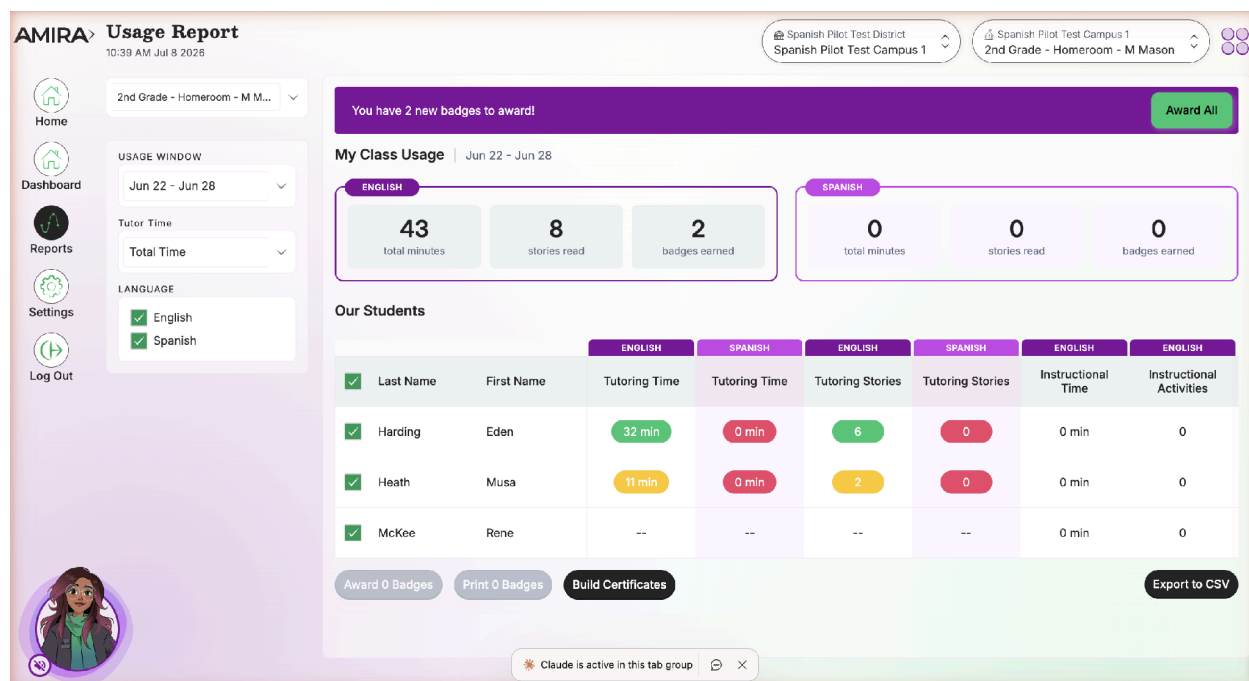
The Usage Report gives teachers a weekly snapshot of student engagement with Amira. It provides a detailed breakdown of both practice and instructional activity, including:

- Total tutoring time for the current week
- Number of stories read
- Instructional activities completed
- Minutes spent on each activity type
- Badges earned for hitting key reading milestones

This report helps teachers monitor student consistency and celebrate progress. Educators can also use it to identify students who may need encouragement or additional support to stay on track. To boost motivation, teachers can award digital badges to students who reach weekly goals.

For classes that include students with a Spanish (Tutora/Enseñar) subscription, the report's Language filter lets teachers view English usage, Spanish usage, or both side by side.

Click [here](#) to learn more about the Usage Report.



Standards Mastery Report

The Standards Mastery Report gives educators a clear view of student progress toward grade-level reading standards, both individually and across the class. Using a criterion-referenced approach, it shows which standards have likely been mastered and where support is still needed.

At the center of the report is the MAST Score – the percentage of assessed standards a student or class has likely mastered. Teachers can also view the MAST Status by Month chart to track changes in mastery levels over time, with categories like Likely Mastered, Developing, and Not Developed.

This report supports informed instructional decisions and helps teachers target support where it's needed most.

Click [here](#) to learn more about the Standards Mastery Report.



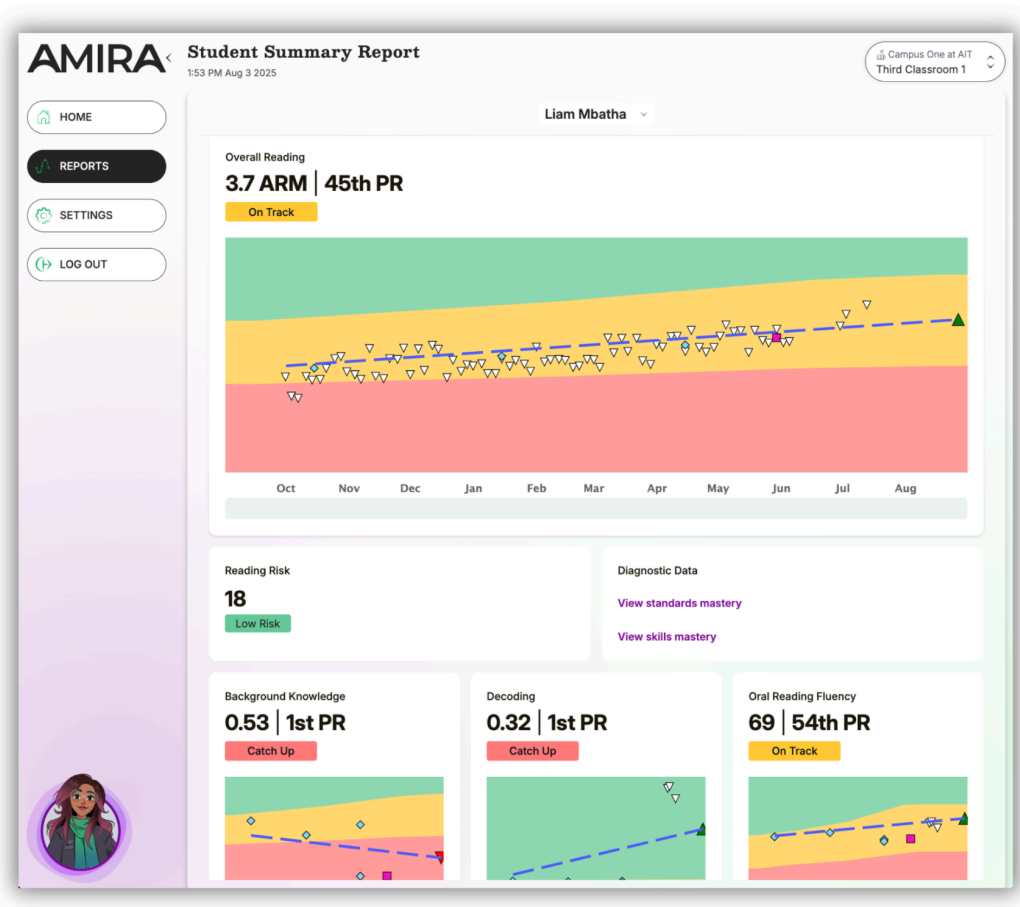
Student Summary Report

The Student Summary Report offers a comprehensive, at-a-glance view of an individual student's reading performance and progress across key domains. Designed to support decision-making within RTI/MTSS frameworks, it helps educators quickly identify strengths, spot potential risks, and access deeper diagnostic tools.

Key features include:

- Performance Overview Chart with score, percentile rank, performance level, and growth tracking using either ARM or ISIP Scaled Scores (based on district settings)
- Dyslexia Risk Indicator, clearly displaying risk status from the most recent assessment
- Interactive Charts for tracking subscore progress across reading domains, color-coded for easy interpretation
- Quick Links to the Skills Diagnostic and Standards Mastery reports for deeper analysis

Click [here](#) to learn more about the Student Summary Report.



5.4 Reports Key

Report	Purpose of the Report	How & When to Use It	Additional Information
Growth Dashboard	Serves as the central hub for accessing student reading data and insights.	Use daily or weekly to guide instruction and monitor student needs.	Provides access to 11 reports; surfaces key data for targeted support.
Benchmark Report	Compare assessment results across class and national norms.	Use after assessments to view class trends and individual performance.	Customizable by metric, language, window, and assessment type. Non-HMH districts with both English and Spanish subscriptions can

			view both side by side in dual language mode.
Class Progress Report	Compare benchmark results across a class over time.	Use to evaluate whole-class growth by month or window.	Toggle to Thread Overview to see strand-level insights.
Parent Report	Communicate reading progress with families in a parent-friendly format.	Share during conferences or progress updates.	Includes suggestions aligned to student needs for at-home support. Parent reports can be printed in English or Spanish.
Progress Report	Track individual student growth and reading activity over time.	Use regularly to monitor progress and review reading sessions.	View transcripts and audio of student readings; includes ORF passages from assessments.
Reading Risk Report	Identify students at risk for reading difficulties (e.g., dyslexia).	Use after assessments to flag students for further screening.	DRI score ≥ 30 \= At Risk. Amira flags risk but does not diagnose dyslexia.
Reading Rope Insights Report	Visualize student performance across Reading Rope components.	Use to identify strengths and needs across reading domains.	Links to Skills Diagnostic; includes recommendations for what the student needs to work on next.
Skills Diagnostic Report	Analyze one student's skill mastery in detail.	Use for individual planning or MTSS discussions.	Color-coded mastery, hover/click for details and instructional resources.
Skills Status Report	View class-wide skill mastery and performance by standard.	Use for forming groups and targeting instruction.	Color-coded mastery, hover/click for details and instructional resources.

Standards Mastery Report	Track progress toward grade-level standards.	Use to guide instruction and monitor growth by month.	Includes MAST Score and mastery distribution by month.
Student Summary Report	See a full picture of one student's reading status.	Use during RTI/MTSS or when reviewing student profiles.	Includes risk indicators, performance charts, and drill-down links.
Usage Report	Monitor student engagement and time spent reading.	Use weekly to celebrate progress and flag underuse.	Track stories, minutes, badges, and activity types. Classes with Spanish-subscribed students can view English and Spanish usage side by side.

Learn more about [norms](#) used for Amira's [metrics](#).

Part 6: Technical Requirements

6.1 System Requirements

Amira Tutor/Tutora is designed to work across a wide range of devices and platforms while maintaining optimal performance and user experience. Understanding these requirements ensures successful implementation and sustained effectiveness.

Device Requirements

Supported Devices:

- Tablets: iPad (iOS 13.0 or later), Android tablets (Android 8.0 or later)
- Computers: Windows 10 or later, macOS 10.14 or later
- Chromebooks: Chrome OS 88.0 or later
- Smartphones: iOS 13.0 or later, Android 8.0 or later (limited functionality)

Chromebook users reading English content now benefit from an improved, browser-based Placement Manager for faster, more responsive word tracking (see Section 1.3). Support for additional devices and languages is planned for future releases.

Hardware Specifications:

- Processor: Minimum dual-core 1.5 GHz processor for optimal speech recognition
- Memory: 4 GB RAM minimum, 8 GB recommended for optimal performance
- Storage: 2 GB available space for application and temporary files
- Audio: Built-in microphone and speakers or headphone capability with clear audio quality
- Display: Minimum 9-inch screen recommended for optimal user interface and text readability

Network and Connectivity

Internet Requirements:

- Bandwidth: Minimum 5 Mbps download, 1 Mbps upload per concurrent user
- Recommended: 10 Mbps download, 2 Mbps upload for optimal AI speech processing
- Latency: Less than 100ms for real-time speech recognition and micro-interventions
- Reliability: Stable connection with minimal interruptions during tutoring sessions

Network Configuration:

- Firewall: Allow connections to *.amiralearning.com domains
- Ports: HTTPS (443), WebSocket connections for real-time AI communication

- Content Filtering: Whitelist educational technology domains in school filtering systems
- Quality of Service: Prioritize traffic to Amira domains during peak usage periods

Browser and Software Requirements

Supported Browsers:

- Chrome: Version 90 or later (recommended for optimal performance)
- Safari: Version 14 or later for Apple devices
- Firefox: Version 88 or later
- Edge: Version 90 or later for Windows devices

Required Browser Features:

- JavaScript enabled for interactive tutoring features
- Cookies and local storage enabled for session management
- Microphone access permissions for speech recognition
- Audio playback capability for AI tutor voice
- WebRTC support for real-time communication with AI systems

View the [Technical Requirements help article](#) for more information.

6.2 Troubleshooting Common Issues

Understanding and resolving common technical issues ensures smooth operation of Amira Tutor/Tutora and minimizes disruption to the learning experience for students and educators. Use this [Troubleshooting Tips](#) document to resolve classroom tech issues quickly.

Audio and Speech Recognition Issues

Microphone Not Detecting Student Voice

- Solutions:
 - Ensure Amira has mic access.
 - Ensure the correct mic is selected.
 - Visit <https://mic-test.com/> to check your mic's functionality.

Background Noise Interfering with Speech Recognition

- Solutions:
 - Position student devices and mics away from each other.
 - Ideally, students should sit with their backs to the wall.
 - Testing dividers or other barriers can help reduce noise bleed.
 - Group students strategically to minimize noise and WiFi strain.

Support Student Behavior

- Wait until the mic turns green to begin reading.
- Read clearly and at a natural pace. Don't rush.
- Avoid rereading unless prompted. Amira will catch up.
- Pause at the end of each page. Don't click ahead too quickly.

Performance Issues

- Solutions
 - Close all other apps, windows, or browser tabs.
 - Run a speed test to ensure minimum device speeds (10 Mbps).
 - Ensure all content filter requirements have been met.

Still Need Help?

Click Amira on your Growth Dashboard to ask a question or request to speak with a live agent, browse [support articles](#), or email support@amiralearning.com.

Part 7: Privacy & Security

7.1 Amira's Commitment to Privacy and Security

Amira exists to help every child learn to read. That mission depends on the trust of the schools, teachers, and families we serve, and Amira treats the protection of student information as a first-order product requirement — engineered into the platform, verified by independent auditors, and governed by binding contracts with every education agency we serve.

Amira's approach rests on five commitments. First, data minimization: Amira collects only the information necessary to deliver assessment, instruction, and tutoring — nothing more. Second, purpose limitation: student data is used solely for authorized educational purposes; Amira never sells student data, never serves advertising to students, and never builds profiles of children for any non-educational purpose. Third, district control: the local education agency (LEA) owns its student data, directs its use, and can require correction, export, or destruction at any time. Fourth, security by design: all data is encrypted in transit and at rest, access is controlled on the principle of least privilege, and the entire program is examined annually by independent SOC 2 Type II auditors. Fifth, closed-loop AI: Amira's speech and reading models run on Amira's own secured infrastructure; Amira never performs public LLM inference during student sessions and never shares student data with public AI platforms such as ChatGPT or Gemini.

Because Amira listens to children read aloud, we hold ourselves to a standard beyond baseline legal compliance for voice data specifically: recordings are stored only in de-identified form, are never used to create voiceprints or biometric identifiers, and are handled by a single infrastructure sub processor (Amazon Web Services) under strict contractual controls. Districts may disable audio retention entirely.

The remainder of this chapter documents each of these commitments in detail.

7.2 Privacy and Security Compliance at a Glance

The table below summarizes Amira's conformance with each element that education agencies, auditors, and privacy frameworks expect of a student data processor. Every element is independently verifiable through Amira's SOC 2 Type II report, executed Data Sharing Agreements, published policies, and district audit rights.

Amira privacy and security compliance elements:

Expected Privacy & Security Element	Amira
Written, board-approved information security program	YES
Independent SOC 2 Type II examination (AICPA Trust Services Criteria)	YES
Encryption of all data in transit (TLS/HTTPS)	YES
Encryption of all data at rest (AES-256)	YES
Role-based access control on the principle of least privilege	YES
Multi-factor authentication for internal system access	YES
Continuous security monitoring and intrusion detection/prevention	YES
Independent third-party penetration testing	YES
Documented, tested incident response plan	YES
Breach notification to the LEA within 72 hours of confirmation	YES
Data minimization: collection limited to educational necessity	YES
Audio stored exclusively in de-identified form	YES
No biometric templates or voiceprints created or used	YES
No sale of student data; no targeted advertising; no marketing profiles of children	YES
No public LLM inference during student sessions; no student data to public AI platforms	YES
Signed Data Sharing Agreement (DSA) offered to every LEA	YES
Subprocessor flow-down contracts imposing equivalent protections	YES
District-controlled data disposition, deletion, and audio-retention settings	YES
Parent/guardian access, review, and correction pathway (via the LEA)	YES
Employee confidentiality agreements and recurring privacy/security training	YES
Alignment with nationally recognized cybersecurity frameworks (NIST CSF, SP 800-53, SP 800-171; AICPA SOC 2)	YES
U.S. data residency for U.S. users; Canadian data residency for Canadian users	YES

EU-U.S. Data Privacy Framework and UK Extension certification for transatlantic data	YES
Recognition of Global Privacy Control (GPC) opt-out signals	YES

7.3 Compliance with Governing Standards: FERPA, COPPA, and GDPR

FERPA (Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g)

Amira operates under FERPA's "school official" exception, 34 C.F.R. § 99.31(a)(1), which permits an LEA to disclose education records to a contractor without individual parental consent when three conditions are met. Amira satisfies all three:

- Legitimate educational interest. Amira performs reading assessment, screening, and tutoring functions the LEA would otherwise perform with its own staff.
- Direct control. Under Amira's Data Sharing Agreement, the LEA retains ownership of all student data and Amira acts only at the LEA's direction.
- Redisclosure limitations. Amira adheres to 34 C.F.R. § 99.33: student data is never redisclosed except as the LEA directs, as the DSA permits, or as law requires.

Amira does not create biometric templates and does not use recordings to identify or authenticate any person; recordings are stored de-identified and used solely for educational purposes. Amira also supports LEA obligations under the Protection of Pupil Rights Amendment (PPRA), 20 U.S.C. § 1232h.

COPPA (Children's Online Privacy Protection Act, 15 U.S.C. §§ 6501–6506)

Amira complies with COPPA and the FTC's school-authorization framework, under which schools may consent to the collection of personal information from children under 13 where the information is used solely for educational purposes and never for commercial exploitation. In Amira's implementation:

- Only authorized school officials — never students — create and manage student accounts; there is no open registration and no anonymous access.
- All collection is governed by the district agreement and used exclusively for school-authorized educational purposes.
- Amira does not sell children's data, does not use children's data for behavioral advertising, and does not build profiles of children beyond authorized educational purposes.
- If Amira learns it has collected a child's personal information without school consent, that information is deleted.

GDPR, UK GDPR, and the EU–U.S. Data Privacy Framework

For personal data originating in the European Union and the United Kingdom, Amira complies with the GDPR and UK GDPR and is certified to the EU–U.S. Data Privacy Framework (DPF) and the UK Extension, as administered by the U.S. Department of Commerce and enforceable by the Federal Trade Commission. Amira's certification is publicly viewable at dataprivacyframework.gov. Key GDPR-aligned commitments include: a documented lawful basis for each processing activity; processor status under school authority with processing limited to school instructions; data subject rights to access, rectification, erasure, restriction, and objection with defined response timelines; breach notification to supervisory authorities within 72 hours; encryption and technical–organizational measures; a designated Privacy Officer; independent recourse mechanisms and binding arbitration for unresolved complaints; and controls that allow a specific education authority to exclude its data from model training upon written request.

7.4 Amira's Privacy Policy

Amira maintains a unified public privacy policy covering the United States, Canada, the European Union, and the United Kingdom, available at all times at amiralearning.com/amira-privacy. The U.S. School Experience policy is reproduced in substance below (last modified June 29, 2026); the Canadian policy (PIPEDA and provincial law) and the EU/UK policy (GDPR, UK GDPR, and DPF) follow the same architecture with jurisdiction-specific rights and are incorporated into this manual by reference.

Scope and Users

The policy explains how Amira Learning, Inc. collects, uses, and discloses information about users of the Amira App, website, and related services. Users include Children (students under 13 enrolled in districts that make Amira available, who may use only the learning portion of the Services) and Educators (teachers and administrators, who alone can create accounts and subscribe).

Children's Information

Amira does not knowingly collect personal information from Children under 13 without school consent, collects and uses Children's information only as needed for authorized educational purposes, deletes any information found to be collected without consent, never sells Children's personal information, never uses Children's information for behavioral ad targeting, and builds no profiles of Children other than to support authorized educational purposes.

Information Collected

- From Educators: registration information (name, email, school affiliation, grade/classes) and roster information for their students (name, school email/credentials, school, class, grade, language, and optionally a parent email address).
- From Children — audio recordings: when a Child interacts with the Amira App, Amira collects recordings of the Child's voice. Recordings enable Amira's algorithms to understand reading strengths and needs, evaluate progress, customize the experience, and improve Amira's models and the App, subject to the de-identification and training controls described in subsequent sections.
- Automatically: device and log information and analytics from Educator use; and, for Children, in-app activity (stories read, taps, progress) used only to support the internal operations of the Services.

Use and Sharing

Information is used to operate, personalize, and improve the Services; to report reading progress to Educators; to provide support, notices, and (for Educators only) relevant communications; to protect security; and to meet legal obligations. Amira shares information only: with vendors and service providers bound to the commitments of the policy; in response to lawful process; to protect rights and safety; in a corporate transaction where the successor is bound to the policy's commitments; and as aggregated or de-identified data that cannot reasonably identify any individual. Amira never discloses a Child's personal information for marketing or promotional purposes.

Rights, Choices, and Retention

Eligible users may request access, correction, or deletion via Amira's Privacy Rights Request Form or trust@amiralearning.com; students and parents exercise these rights through their school, which verifies identity and authority. Amira honors Global Privacy Control opt-out signals. Unless law requires longer retention, Amira retains personally identifiable information only while the LEA maintains its subscription; upon cancellation or termination, PII is retained sixty (60) days to accommodate subscription lapses and is then destroyed. PII is also destroyed at any time upon LEA request. Amira's Privacy Officer may be reached at trust@amiralearning.com or Amira Learning, Inc., 490 Post St, Suite 500 PMB 2538, San Francisco, CA 94102.

7.5 Student Audio: De-Identified Storage on AWS, and Nowhere Else

Student voice recordings receive the most conservative treatment of any data class in the Amira platform. Two structural rules govern them:

- **Rule 1 — De-identified storage only.** Audio is stored exclusively in de-identified form. Recordings are separated from directly identifying roster information and maintained such that the audio itself does not reasonably identify a specific child. Amira does not create voiceprints or biometric templates from recordings, and recordings are never used to identify or authenticate any person.
- **Rule 2 — A single infrastructure subprocessor.** De-identified audio resides on Amazon Web Services (AWS) infrastructure in the United States (or, for Canadian users, on AWS infrastructure located in Canada). AWS is the only subprocessor with any custody of student audio. Audio files are not provided to, shared with, or made accessible to any other subprocessor, vendor, analytics provider, or third party of any kind. Amira's speech recognition and scoring models are Amira's own and run within Amira's AWS environment — no external speech-to-text service ever receives student audio.

Districts retain full control: audio retention can be disabled entirely at the district's election, recordings are erased on district request, and audio is destroyed pursuant to the retention schedule. Teachers may replay a student's recordings for instructional purposes (for example, demonstrating growth at a parent-teacher conference) through authenticated, role-based access only.

7.6 Security Provisions for Audio, Including Encryption

Audio inherits every control in Amira's SOC 2 Type II security program, plus voice-specific safeguards:

- **Encryption in transit.** Every recording is encrypted using TLS from the moment it leaves the student's device until it reaches Amira's environment; all internal service-to-service transfers are likewise encrypted.
- **Encryption at rest.** Audio at rest is encrypted with AES-256 on AWS storage, with managed key rotation; backups are encrypted to the same standard.
- **Access control.** Access to audio is restricted by role-based access control on the principle of least privilege; Amira personnel access to student records requires senior approval and a specific need; all internal access requires multi-factor authentication and is logged.
- **De-identification at rest.** Stored audio is maintained in de-identified form, so that even in the event of unauthorized storage access, recordings are not linked to an identified child.
- **Monitoring and testing.** Intrusion detection and prevention systems monitor the environment continuously; independent third parties conduct penetration tests; vulnerabilities are scanned continuously and patched promptly.

- **Incident response.** A written, tested incident response plan governs any suspected incident, with notification to affected LEAs within 72 hours of confirmation and cooperation with all required regulatory notifications.
- **Secure destruction.** When audio reaches the end of retention or an erasure request is honored, deletion uses secure protocols (overwriting or cryptographic wiping), including purges of backup media on routine cycles.

7.7 Policy: No Audio Sharing with Any Subprocessor Except AWS

It is Amira's firm policy that student audio files are not shared with any subprocessor except Amazon Web Services, which provides the secured infrastructure on which the de-identified recordings reside. This is a categorical rule, not a default: no analytics vendor, no support platform, no communications provider, no AI service, and no other third party receives student audio, in identified or de-identified form. Where other subprocessors support the platform, they operate on non-audio data classes only. Any future change to this policy would require: (1) advance written notice to every affected LEA; (2) execution of flow-down contractual protections at least as protective as Amira's DSA; and (3) the LEA's opportunity to object and direct otherwise before any transfer occurs. This policy is enforceable by every LEA through the DSA's audit rights and is within the scope of Amira's annual SOC 2 Type II examination.

7.8 Data Sharing Agreement (DSA) Policy and Model DSA

Amira offers — and encourages — a signed Data Sharing Agreement with every school, district, and state education agency it serves. The DSA is the controlling instrument for student data: where its terms conflict with any other writing, including the service agreement, terms of service, or privacy policy, the DSA controls. Amira's model DSA parallels the Student Data Privacy Consortium's National Data Privacy Agreement (NDPA) in structure and substance, and Amira executes NDPA-form agreements with state-specific exhibits wherever a district or state alliance requests. Core DSA commitments include: LEA ownership and control of all student data; Amira's status as a FERPA school official under LEA direction; enumerated authorized uses and a prohibition on all others; no sale of student data and no targeted advertising; parent access and correction through the LEA; law-enforcement request notification; breach notification within 72 hours; LEA audit rights; a cybersecurity framework requirement (NIST and SOC 2); data disposition within 30 days of request; and

survival of obligations through any corporate succession, with the LEA holding termination rights over any successor. The complete model DSA follows.

Model Student Data Sharing Agreement (Amira Learning Standard DSA Template, v1.0)

STUDENT DATA SHARING AGREEMENT — Amira Learning Standard DSA Template, Version 1.0

This Student Data Sharing Agreement ("DSA") is entered into on the date of full execution (the "Effective Date") by and between _____ (the "LEA"), located at _____, and Amira Learning, Inc. (the "Provider"), located at 490 Post St., Suite 500, PMB 2538, San Francisco, CA 94102.

WHEREAS, the Provider is providing educational or digital services to the LEA; WHEREAS, the Provider and the LEA recognize the need to protect personally identifiable student information and other regulated data exchanged between them as required by applicable laws and regulations, such as the Family Educational Rights and Privacy Act ("FERPA") at 20 U.S.C. § 1232g (34 C.F.R. Part 99); the Children's Online Privacy Protection Act ("COPPA") at 15 U.S.C. §§ 6501-6506 (16 C.F.R. Part 312); the Protection of Pupil Rights Amendment ("PPRA") at 20 U.S.C. § 1232h; and the applicable student data privacy laws and regulations of the State of _____; and WHEREAS, the Provider and the LEA desire to enter into this DSA for the purpose of establishing their respective obligations and duties in order to comply with applicable laws and regulations. NOW THEREFORE, for good and valuable consideration, the LEA and Provider agree as follows:

A description of the Services to be provided, the categories of Student Data that may be provided by the LEA to Provider, and other information specific to this DSA are contained in the Standard Clauses hereto. In the event there is conflict between the terms of this DSA and any other writing, including, but not limited to, the Service Agreement and Provider Terms of Service or Privacy Policy, the terms of this DSA shall control. This DSA shall stay in effect for the term of the LEA's subscription to Amira unless earlier terminated as provided herein. The services to be provided by Provider to the LEA pursuant to this DSA are detailed in Exhibit "A" (the "Services"). Notices may be given via e-mail or first-class mail to the parties' designated representatives. [Signature blocks and representative designations appear in the executable template.]

STANDARD CLAUSES — ARTICLE I: PURPOSE AND SCOPE

Purpose of DSA. The purpose of this DSA is to describe the duties and responsibilities to protect Student Data, including compliance with all applicable federal, state, and local privacy laws, rules, and regulations, all as may be amended from time to time. In performing the Services, the Provider shall be considered a School Official with a legitimate educational interest, performing services otherwise provided by the LEA. Provider shall be under the direct control and supervision of the LEA with respect to its use of Student Data. The LEA agrees that the Provider is a School Official acting on the LEA's behalf.

Student Data to Be Provided. In order to perform the Services described above, the LEA shall provide Student Data as identified in the Schedule of Student Data, attached hereto as Exhibit "B". DSA Definitions. The definition of terms used in this DSA is found in Exhibit "C". In the event of a conflict, definitions used in this DSA shall prevail over terms used in any other writing.

ARTICLE II: DATA OWNERSHIP AND AUTHORIZED ACCESS

Student Data Property of LEA. All Student Data transmitted to the Provider pursuant to the Service Agreement is and will continue to be the property of and under the control of the LEA. All copies of such Student Data, including any modifications or additions or any portion thereof from any source, are subject to the provisions of this DSA in the same manner as the original Student Data. As between the Parties, all rights, including all intellectual property rights in and to Student Data, shall remain the exclusive property of the LEA. For the purposes of FERPA, the Provider shall be considered a School Official, under the control and direction of the LEA as it pertains to the use of Student Data.

Parent Access. To the extent required by law, the LEA shall establish reasonable procedures by which a parent, legal guardian, or eligible student may review Education Records and/or Student Data, correct erroneous information, and procedures for the transfer of student-generated content to a personal account. Provider shall respond in a reasonably timely manner (and no later than forty-five (45) days from the date of the request, or sooner where state law requires) to the LEA's request for Student Data in a student's records held by the Provider. If a parent or other individual contacts the Provider directly to review Student Data, the Provider shall refer them to the LEA. Separate Account. If Student Generated Content is stored by the Provider, Provider shall, at the LEA's request, transfer or provide a mechanism to transfer it to a student's personal account. Law Enforcement Requests. Should law enforcement or other government entities contact Provider with a request for Student Data, the Provider shall notify the LEA in advance of a compelled disclosure, unless lawfully directed otherwise.

ARTICLE III: DUTIES OF LEA

The LEA shall: provide Student Data in compliance with all applicable laws; include its "School Official" criteria in its FERPA annual notification of rights where applicable; take reasonable precautions to secure credentials and obtain consents as required by governing law; and promptly notify Provider of any known unauthorized access and assist in investigation and response.

ARTICLE IV: DUTIES OF PROVIDER

Privacy Compliance. The Provider shall comply with all applicable federal and state laws and regulations pertaining to data privacy and security, including FERPA, COPPA, PPRA, the applicable student data privacy laws of the State, and all other applicable laws, as amended. Authorized Use.

Student Data, including persistent unique identifiers, shall be used for no purpose other than the Services in Exhibit "A", the purposes authorized in Section 6 of this Article IV, or as stated in the Service Agreement and otherwise authorized under the statutes referred to in this DSA. Provider Employee Obligation. Provider shall require all employees and agents with access to Student Data to comply with this DSA and shall maintain appropriate confidentiality agreements with each.

No Disclosure. Provider shall not re-disclose any Student Data or any portion thereof, including user content or other non-public or personally identifiable information, other than as directed or permitted

by the LEA or this DSA. This prohibition does not apply to aggregate summaries of De-Identified information, disclosures pursuant to lawfully issued subpoena or other legal process, or to Subprocessors performing services on behalf of the Provider pursuant to this DSA. Provider will not Sell Student Data to any third party.

De-Identified Data. Provider agrees not to attempt to re-identify De-Identified Student Data. De-Identified Data may be used for purposes allowed under FERPA and for: (1) assisting the LEA or other governmental agencies in conducting research and other studies; (2) research and development of the Provider's educational sites, services, or applications, and to demonstrate the effectiveness of the Services; and (3) adaptive learning purposes and customized student learning. Provider's use of De-Identified Data shall survive termination of this DSA or any request to return or destroy Student Data. Except for Subprocessors, Provider agrees not to transfer De-Identified Student Data to any party unless (a) that party agrees in writing not to attempt re-identification, and (b) prior written notice has been given to the LEA, who has provided prior written consent. Prior to publishing any document naming the LEA, the Provider shall obtain the LEA's written approval of the manner in which De-Identified Data is presented.

Consent to Use of Data for Educational Purposes and Product Improvement. The LEA hereby consents to, and authorizes, Provider's use of Student Data for the following purposes, each of which the Parties agree constitutes a legitimate educational interest and use on behalf of the LEA: (1) to provide, deliver, maintain, support, and secure the Services; (2) for adaptive learning and customized or personalized student learning, including generating individualized instruction, practice, feedback, and personalized learning recommendations for students; (3) to generate assessments, screenings, reports, and analytics for the LEA, its teachers, and administrators, and, where applicable, for parents and legal guardians; (4) to maintain, develop, support, evaluate, diagnose, and improve Provider's educational products and services, including improving and training the accuracy and efficacy of Provider's reading assessment, speech recognition, and instructional models; and (5) to demonstrate the effectiveness of the Services. Where Student Data is used pursuant to subsections (4) or (5), Provider shall (a) apply the security and confidentiality protections of this DSA to all such data; (b) De-Identify such data prior to any use or disclosure outside of Provider and its Subprocessors; and (c) not use such data for Targeted Advertising or to Sell Student Data.

Disposition of Data. Upon written request from the LEA, Provider shall dispose of or provide a mechanism to transfer Student Data within thirty (30) days of the request. Upon termination of this DSA, if no written request is received, Provider shall dispose of all Student Data after reasonable prior notice to the LEA. The duty to dispose does not extend to De-Identified Data or data placed in a separate student account. The LEA may employ the "Directive for Disposition of Data" (Exhibit "D").

Advertising Limitations. Provider is prohibited from using, disclosing, or selling Student Data to (a) inform, influence, or enable Targeted Advertising; or (b) develop a profile of a student, family member/guardian, or group, for any purpose other than providing the Services. This does not prohibit adaptive learning, product recommendations to teachers or LEA employees, or notices to account holders about education product updates.

ARTICLE V: DATA PROVISIONS

Data Storage. Where required by applicable law, Student Data shall be stored within the United States. Upon request, Provider will provide a list of locations where Student Data is stored. **Audits.** No more than once a year, or following unauthorized access, upon written request with at least ten (10) business days' notice and execution of an appropriate confidentiality agreement, the Provider will allow the LEA to audit the security and privacy measures in place. The Provider will cooperate reasonably with the LEA and any local, state, or federal agency with oversight authority, providing reasonable access to facilities, staff, agents, Student Data, and records. Failure to reasonably cooperate is a material breach.

Data Security. The Provider agrees to utilize administrative, physical, and technical safeguards designed to protect Student Data from unauthorized access, disclosure, acquisition, destruction, use, or modification, shall adhere to applicable data security law, and shall implement an adequate Cybersecurity Framework based on nationally recognized standards set forth in Exhibit "E" (NIST SP 800-53; NIST CSF; NIST SP 800-171; AICPA SOC 2). **Data Breach.** In the event of an unauthorized release, disclosure, or acquisition of Student Data, the Provider shall notify the LEA's designated representative immediately, but not longer than seventy-two (72) hours after confirmation of the incident, including a forensic report, an account of data that may have been compromised, and corrective actions. Notice shall be clear and conspicuous and include the statutory elements (nature of the incident, data types involved, protective steps, contact information, vigilance guidance, dates or date ranges, and any law-enforcement delay). Provider shall maintain a written incident response plan consistent with industry standards and provide a summary on request, and shall cooperate with the LEA to secure Student Data in the event of a breach originating from the LEA's use of the Service.

ARTICLE VI: MISCELLANEOUS

Termination and Survival. The Parties may terminate by mutual written consent; upon termination of the Service Agreement, Provider shall dispose of Student Data pursuant to Article IV, Section 7. **Priority of Agreements.** This DSA governs the treatment of Student Data and takes precedence over the Service Agreement, Terms of Service, Privacy Policies, or any other writing in the event of conflict. **Entire Agreement; Counterparts; Electronic Signatures; Severability; Governing Law and Venue** [State/County to be designated]. **Successors Bound.** This DSA binds successors in interest; the Provider shall give written notice within sixty (60) days after closing of any sale, merger, or disposition, with signed assurance that the successor assumes the DSA's obligations; the LEA may terminate if it disapproves of the successor. **Authority; Waiver.**

EXHIBIT A — DESCRIPTION OF SERVICES

Amira Learning licenses include access to Amira ISIP Assess and Amira Tutor. Amira Tutor is an AI-based literacy platform that listens to students read aloud, provides real-time feedback and coaching, and generates detailed reports on reading accuracy, fluency, and comprehension. Amira ISIP Assess includes screening, benchmarking, and progress-monitoring tools aligned with current research in the science of reading, including frameworks such as the Active View of Reading and the Multiple Deficit Model, supporting early identification of reading difficulties, including indicators of

dyslexia. Participating schools receive access for all students in designated grades, along with teacher and staff training, implementation support, and access to student-level data and reporting tools.

EXHIBIT B — SCHEDULE OF STUDENT DATA

Categories and elements collected, used, or processed: Application Technology Metadata (IP addresses, cookies, browser user agent); Application Use Statistics (metadata on user interaction); Assessment (reading assessment, screening, benchmarking, and progress-monitoring observation data generated by the Services); Demographics (gender, ethnicity/race, English proficiency status, special education flag/IEP/504, and native or primary language — accepted via district roster if provided; not required); Enrollment (school enrollment, grade level, class enrollment); Schedule (teacher names); Student Identifiers (local district ID, state-assigned ID, provider/app-assigned ID, app username and password); Student Name (first and/or last); Student In-App Performance (reading level, accuracy, fluency, and comprehension measures generated by the Services). The Provider does not collect or process categories or elements other than those identified, and will notify the LEA and obtain any required consent or amendment before collecting any additional categories.

EXHIBIT C — DEFINITIONS (SUMMARY)

The template defines, among other terms: De-Identified Data (records from which all personally identifiable information has been removed or obscured such that remaining information does not reasonably identify a specific individual); Educational Records; LEA; Metadata; Operator; Provider; Student Generated Content; School Official (per 34 C.F.R. § 99.31(a)(1)(i)(B)); Service Agreement; Student Data (broadly defined to include, among other elements, voice recordings, biometric information, and any information that would identify a specific student; excluding anonymized or de-identified data); Subprocessor (a party other than the LEA or Provider whom Provider uses for data collection, analytics, storage, or other service to operate and/or improve its service and who has access to Student Data); Subscribing School; Targeted Advertising; and Third Party.

EXHIBIT D — DIRECTIVE FOR DISPOSITION OF DATA

A standing form by which the LEA directs disposition (partial or complete; by destruction/deletion or by transfer; on a designated schedule or as soon as commercially practicable), executed by the LEA's authorized representative and verified by the Provider's authorized representative.

EXHIBIT E — DATA SECURITY REQUIREMENTS

The Provider has implemented and maintains an adequate cybersecurity program based on the following nationally recognized Cybersecurity Frameworks: National Institute of Standards and Technology — NIST SP 800-53, the Cybersecurity Framework for Improving Critical Infrastructure Cybersecurity (CSF), and Special Publication 800-171; and the American Institute of Certified Public Accountants — Systems and Organization Controls (SOC 2). Any exclusions, variations, or exemptions, and any additional security programs and measures, are detailed in an attachment to Exhibit "E".

7.9 Consents Provided by Districts to Amira

Amira's legal authority to serve students flows from the district, and the consent architecture has three layers:

- **FERPA school-official designation.** By executing the DSA and service agreement, the LEA designates Amira a school official with a legitimate educational interest under 34 C.F.R. § 99.31(a)(1), authorizing the rostering of students and the sharing of education records — including reading performance data and voice recordings — without individual parental consent, subject to the LEA's direct control and FERPA's redisclosure limits.
- **COPPA school authorization.** The school provides consent on behalf of parents for collection of personal information from children under 13, valid because the information is used strictly for educational purposes and never for commercial exploitation, consistent with the FTC's school-consent framework.
- **Enumerated DSA consents.** Article IV, Section 6 of the DSA records the LEA's express consent to five defined uses: service delivery and security; adaptive and personalized learning; generation of assessments, reports, and analytics for educators and families; maintenance, evaluation, and improvement of Amira's reading assessment, speech recognition, and instructional models; and demonstration of service effectiveness — with improvement uses conditioned on de-identification before any use or disclosure outside Amira and its subprocessors, and with targeted advertising and sale categorically prohibited.

Districts additionally control operational consents: enabling or disabling audio retention, directing erasure, authorizing (or declining) any use of their data in model training where state law or district policy so requires, and approving any publication that references the district. Amira supports district-led parent notification and opt-out processes and provides plain-language documentation for families on request.

The Family Educational Rights and Privacy Act (FERPA) generally prohibits SEAs & LEAs from disclosing personally identifiable information (PII) from education records without written parental consent. Congress and the U.S. Department of Education, however, have long recognized that schools do not perform every institutional function with W-2 employees: they engage contractors — for student information systems, learning platforms, assessments, transportation routing, food service, and more — and those contractors necessarily handle education records. The "school official" exception, 34 C.F.R. § 99.31(a)(1), is the legal mechanism that makes this possible while preserving FERPA's protections. The SEA/LEA exception permits disclosure without individual consent to a contractor that (1) performs an institutional service or function for which the school would otherwise use employees, (2)

operates under the school's direct control with respect to education records, and (3) is bound by FERPA's redisclosure limitations.

The Exception is grounded in these three well-established characteristics. First, the exception is not a loophole but a deliberately designed, twice-codified regulatory framework — formalized in the Department's 2008 rulemaking, reaffirmed in 2011, and elaborated in a decade of Department guidance — that conditions the privilege of access on district control and educational purpose. Second, the Exception is the operating basis for the entire American education technology sector: thousands of companies, and by extension the digital infrastructure of nearly every U.S. school district, function as school officials. Amira relies on the industry-standard, Department-sanctioned architecture for student data use. Third, the framework is court-tested and court-sanctioned — in the Supreme Court, in federal district courts, in state attorney general actions, and at the Federal Trade Commission — and it has held. Courts and regulators have policed its boundaries, consistently punishing commercial exploitation of student data while leaving the core educational-outsourcing framework intact. No court has invalidated the school official regulation. The judicial record therefore defines a safe harbor with remarkable clarity: a provider under SEA/LEA control, using data solely for authorized educational purposes, with no advertising or sale, is allowed to receive, process and retain student data.

The school official exception is not a niche arrangement; it is the legal foundation of the American K-12 digital ecosystem. The scale is documented:

- **Tool counts.** Instructure/LearnPlatform's widely cited EdTech Top 40 research, based on billions of usage data points, has found that U.S. school districts access on the order of 2,500 or more distinct edtech tools in a single school year, with thousands of unique products observed across districts nationally. Each tool that touches an education record — a roster, a score, a student work product — operates, if it operates lawfully without individual parental consent, as a school official under § 99.31(a)(1) or under a state-law contract regime built on the same structure.
- **Contract registries.** The Student Data Privacy Consortium's national registry and its state alliances catalog tens of thousands of executed data privacy agreements between districts and providers, the overwhelming majority built on the National Data Privacy Agreement — whose Article I, like Amira's DSA, expressly designates the provider a school official under the LEA's direct control. State registries required by statute (New York's § 2-d supplemental postings, Illinois SOPPA postings, Connecticut's registry) document the same population of vendors on the same basis.
- **The infrastructure layer.** Every category of core district software operates under this framework: student information systems (PowerSchool, Infinite Campus, Skyward), learning management systems (Canvas, Schoology, Google Classroom), productivity

suites (Google Workspace for Education, Microsoft 365 Education), rostering and identity providers (Clever, ClassLink), assessment platforms (NWEA MAP, Curriculum Associates i-Ready, Renaissance Star, Amplify mCLASS, Istation/Amira), communications systems, transportation, nutrition, and special-education case management. The U.S. Department of Education's guidance assumes this reality: its 2014 online-services guidance and successors are written to help districts use the school official exception properly, not to discourage its use.

- **Voice and audio specifically.** Audio is not novel within the framework: districts have for decades administered assessments that record student voices through contractors — most prominently the speaking domains of federally required English learner assessments (e.g., WIDA ACCESS, administered and centrally scored by Data Recognition Corporation), along with world-language proficiency tests and reading-fluency tools. The school official/assessment-contractor structure has carried recorded student speech since long before AI entered the conversation.

The significance for any evaluation of Amira is proportionality: Amira's legal basis is the same one on which a typical district relies more than two thousand times over. The relevant question for a district or policymaker is therefore never whether the school official exception is legitimate — the entire sector, with the Department's blessing, answers that — but whether a given provider satisfies its conditions in fact. Sections 3 and 6 document that Amira does, with a contract that implements each condition expressly.

7.10 Challenges and Judicial Precedent

The FERPA framework, and the outsourcing model built on it, have been tested repeatedly across five decades. The precedent sorts into three groups: cases defining FERPA's enforcement architecture, challenges to the regulatory framework itself, and enforcement actions policing the boundaries of school-based consent. Together they yield a consistent doctrine: the framework stands; its abuse is punished.

Gonzaga University v. Doe, 536 U.S. 273 (2002). The Supreme Court held that FERPA's nondisclosure provisions create no personal rights enforceable under 42 U.S.C. § 1983 — there is no private right of action under FERPA. Enforcement runs exclusively through the Secretary of Education's funding-condition authority, administered today by the Student Privacy Policy Office, which investigates complaints and secures voluntary compliance, with fund termination as the ultimate sanction. For the school official framework, Gonzaga means the compliance relationship is institutional: districts answer to the Department, and vendors answer to districts through contract — which is exactly why a rigorous DSA matters so much,

since the district's contractual remedies (and § 99.33(e) debarment) are the operative enforcement mechanism against a provider.

United States v. Miami University, 294 F.3d 797 (6th Cir. 2002). The Sixth Circuit confirmed the other half of the architecture: the United States may sue to enjoin violations of FERPA's conditions, and FERPA's protections are real, binding obligations — not precatory. The pair of 2002 decisions thus establishes that FERPA is enforced vertically (Department to institution) rather than through private tort-style litigation.

Owasso Independent School District v. Falvo, 534 U.S. 426 (2002). The Court held that peer-graded papers are not "education records" before a teacher records them, reading "maintained" to suggest records kept in a central custodial sense. Owasso matters here for its interpretive posture: the Court declined to read FERPA in a manner that would federalize every classroom practice, signaling judicial reluctance to convert FERPA into an instrument that disrupts ordinary educational operations — the same practical spirit that animates the school official exception.

Challenges to the Regulatory Framework

Electronic Privacy Information Center (EPIC) v. U.S. Department of Education, 48 F. Supp. 3d 1 (D.D.C. 2014). The most direct legal attack on the Department's modernized FERPA regulations. EPIC challenged the 2011 amendments under the Administrative Procedure Act, arguing the Department had exceeded its statutory authority in broadening information-sharing definitions. The district court dismissed for lack of Article III standing without reaching the merits. The practical upshot: the Department's regulatory framework — including the 2008 outsourcing codification, which has now governed for nearly two decades — has never been vacated, enjoined, or held unlawful by any court. A regulation of this consequence, in continuous nationwide operation since 2008, unsuccessfully challenged and repeatedly reaffirmed in Department guidance, occupies about as settled a position as administrative law affords.

Policing the Boundaries: Commercial Use Cases and Enforcement

In re Google Inc. Gmail Litigation, No. 13-MD-02430 (N.D. Cal. 2014), and the Apps for Education advertising controversy. Plaintiffs, including student users of Google Apps for Education, alleged that Google's scanning of email content for advertising purposes violated wiretap laws; the litigation revealed that student accounts were subject to content scanning. The court denied class certification, but the reputational and legal pressure produced the structural result: in April 2014 Google announced it had permanently removed ads scanning from Apps for Education. The episode is the sector's foundational cautionary tale, and its

lesson is a precise statement of the school official exception's boundary — a provider's authority over student data extends exactly as far as the educational purpose, and commercial exploitation forfeits the framework's protection along with the market's trust.

Balderas v. Google LLC (D.N.M., filed Feb. 2020; 489 F. Supp. 3d 1254 (D.N.M. 2020)). Of particular relevance to New Mexico stakeholders: the state's Attorney General sued Google over children's data collected through Chromebooks and G Suite for Education, alleging COPPA violations and related state-law claims, and contesting the sufficiency of school-based consent. The federal district court dismissed the COPPA claim at the pleading stage in September 2020, and the matter thereafter resolved with Google undertaking enhanced student-privacy commitments in New Mexico without any judicial ruling invalidating the school-consent framework. The takeaway is two-sided and honest: state attorneys general are active and willing to test edtech data practices — and the school-consent architecture emerged from the test intact, with the enforcement energy directed at transparency and use limits rather than at the framework itself.

United States v. Edmodo, LLC (N.D. Cal. 2023) and the FTC's May 2023 Policy

Statement. The Federal Trade Commission's action against Edmodo is the controlling modern statement of where school-based authorization ends. The FTC alleged Edmodo collected students' personal information and used it for advertising, and unlawfully pushed its COPPA compliance duties onto schools without providing the required notices — resulting in a stipulated order.

State-law overlays. Finally, the states have legislated the same boundary rather than displacing the framework: the forty-plus SOPIPA-family statutes (California Bus. & Prof. Code § 22584 and its progeny), New York Education Law § 2-d, Illinois SOPPA, and their counterparts all presuppose that operators will hold student data under school engagement — and then prohibit precisely the conduct the Google and Edmodo matters involved: sale, targeted advertising, and non-educational profiling. The legislative record thus confirms the judicial one: fifty state legislatures examined vendor access to student data and, rather than abolishing it, codified its conditions.

Synthesis

Across the Supreme Court's FERPA cases, the failed APA challenge, the state AG litigation, and the FTC's enforcement program, one doctrine emerges with unusual clarity. The school official / school consent framework is lawful, settled, and universally relied upon; what courts and regulators punish is its abuse — the use of children's data for the provider's own commercial benefit. Every adverse outcome in the record involves advertising, monetization, or opacity. No adverse outcome involves a provider that confined itself to the

district-authorized educational purpose under genuine district control. The precedent therefore does more than permit Amira's model; it maps the exact conduct that keeps a provider safe, and that conduct — no sale, no advertising, no non-educational profiling, district ownership and control, enumerated purposes, transparency, and enforceable contracts — is a description of Amira's Data Sharing Agreement and published commitments.

Application to Amira

Amira operates within the school official exception the way the Department of Education's guidance instructs: the institutional function (reading assessment and instruction) is one districts otherwise perform with employees; direct control is established and operationalized by state or district contract, and § 99.33(a)'s use and redisclosure limits are implemented. Amira sits on the compliant side of every line the precedent draws: it does not advertise, does not sell, does not profile for non-educational purposes, does not shift its own duties onto schools, and documents its practices in instruments districts can enforce and auditors can examine.

When a parent, board member, or legislator asks "who allowed a company to receive my child's reading data without my signature?", the accurate answer has three parts. Congress did, in 1974, when it vested the school-official determination in the educational agency; the Department of Education did, in 2008 and since, when it codified and repeatedly reaffirmed the conditions under which contractors may serve as school officials; and the parent's SEA or LEA did, when it executed an agreement or contract with Amira. Amira is authorized by the same legal act the district performs for the thousands of other tools its students touch each year. The framework has been challenged and has held; its boundaries have been enforced, and Amira honors them. Amira's consent is in its established institutional form — the one federal law has provided for half a century, refined for the digital era, and entrusted to the educational authorities accountable to the communities they serve.

7.11 Subprocessor Policy

Amira engages a deliberately small set of subprocessors and holds each to the same commitments Amira makes to districts. The policy has six elements: (1) Necessity — a subprocessor is engaged only where required to operate, secure, or support the Services (e.g., cloud infrastructure, communications delivery, support tooling); (2) Due diligence — every subprocessor is vetted for security posture, certifications, and legal compliance before engagement and periodically thereafter; (3) Flow-down contracts — every subprocessor executes a data processing agreement imposing confidentiality, security, purpose-limitation, and breach-notification obligations at least as protective as Amira's DSA, with immediate notice required if the subprocessor can no longer meet them; (4) Purpose limitation —

subprocessors may process data solely to perform their function for Amira, never for their own purposes, marketing, or advertising; (5) Data-class restriction — student audio is restricted to AWS alone, and no subprocessor receives more data than its function requires; and (6) Accountability — Amira maintains records of all subprocessor transfers, remains fully responsible and liable for subprocessor handling of personal data (including under the EU-U.S. DPF), and makes its subprocessor list available to LEAs, with notice of changes and the opportunity to object.

7.12 State Legislation: Landscape and Amira's Conformance

Student data privacy in the United States is governed by a lattice of state statutes layered atop FERPA, COPPA, and PPRA. More than forty states have enacted student privacy laws since California's SOPIPA (2014) established the operator model — no targeted advertising, no profiling, no sale, reasonable security, deletion on request — which most states have since adapted. A second wave, exemplified by New York's Education Law § 2-d and Connecticut's Public Act 16-189, added mandatory contract terms, parents' bills of rights, framework-based security requirements, and breach-notification duties. A third wave is now emerging that regulates AI in education specifically: in 2026 alone, 77 bills across 27 states address AI in classroom instruction, including procurement standards, approved-tool lists, and restrictions on training AI systems with student data. Amira's compliance strategy is to conform to the strictest common denominator — the DSA's protections apply nationally, not only where mandated — and to add state-specific riders wherever statute requires. The table below summarizes representative statutes and Amira's conformance.

The table below outlines representative state statutes and Amira conformance. This table is illustrative of Amira's approach across all states; Amira executes state-specific agreements and exhibits wherever required and monitors pending legislation (including New Mexico's LESC recommendations and similar 2026-27 proposals) through its policy team.

Jurisdiction / Law	Core Requirements	Amira Conformance
California — SOPIPA (Bus. & Prof. Code § 22584)	Prohibits targeted advertising, profiling, and sale of K-12 student data; requires reasonable security; deletion on district request.	Amira does not sell student data, serves no advertising, and builds no non-educational profiles; security program and deletion workflows satisfy SOPIPA's operator duties.

California — AB 1159 (2025)	Prohibits operators from using student data to train generative AI systems; expands student privacy protections; creates a private right of action.	Amira maintains per-LEA controls that exclude an LEA's data from model training absent specific written authorization; California deployments operate with training exclusions applied consistent with the statute.
New York — Education Law § 2-d / Part 121	Parents' Bill of Rights, supplemental information, NIST CSF alignment, encryption, breach notice, and data-privacy contract terms.	Amira executes § 2-d riders with New York LEAs, publishes supplemental information, encrypts data in transit and at rest, and aligns its security program to the NIST Cybersecurity Framework.
Connecticut — Public Act 16-189	Written contracts with prescribed student-privacy terms; breach notification to districts and the state.	Amira's DSA incorporates the required contract terms, and its 72-hour LEA breach-notification commitment meets the Act's timelines.
Texas — Education Code Ch. 32 (student data) and HB 18 (SCOPE Act)	Student data privacy duties for operators; duties regarding minors' online experience, harmful content, and data collection.	Amira collects only school-authorized educational data, provides no open registration, no advertising, and no unmoderated content, and supports district agreements under Texas law.
Illinois — SOPPA (105 ILCS 85) and BIPA (740 ILCS 14)	SOPPA: written agreements, posted subcontractor lists, breach notice, no sale. BIPA: consent and policy duties for biometric identifiers, including voiceprints.	Amira executes SOPPA-compliant agreements and posts required disclosures. Amira does not create or use voiceprints or any biometric template; recordings are never used to identify a person, placing Amira's processing outside BIPA's biometric-identifier scope while district consent frameworks provide additional cover.
Colorado — Student Data Transparency and Security Act	Contract provisions, transparency lists, collection limits, and destruction duties for school service providers.	Amira's DSA, published data schedule (Exhibit B), and disposition process (Exhibit D) implement each duty.

Idaho — SB 1227 (2026)	Requires AI tool procurement to comply with state and federal privacy law; authorizes an approved-tools list; prohibits AI from replacing teachers.	Amira, a statewide Idaho partner, is designed as a teacher-support tool and satisfies the procurement privacy requirements; Amira supports and participates in approved-tool vetting.
Nevada — AB 406 (2025)	Prohibits public schools from using AI to perform counselor, psychologist, or social-worker functions.	Not applicable by design: Amira performs literacy assessment and tutoring only and performs no counseling or mental-health functions.
New Mexico — PED AI Guidance; LESC 2026 policy recommendations (pending)	Non-binding guidance today; recommendations for AI procurement standards, privacy requirements, and a vetted-tools list are before the Legislature.	Amira operates statewide under PED's assessment program, supports districts' ability to disable audio retention, and has committed to participate in any vetting or evaluation framework New Mexico adopts.
NDPA / SDPC member states (MA, CA, TX, OH, IL, and others)	Standardized National Data Privacy Agreement with state-specific exhibits, adopted by state alliances of the Student Data Privacy Consortium.	Amira's model DSA parallels the NDPA's structure and obligations, and Amira executes NDPA-form agreements, including state exhibits, wherever an alliance district requests them.
Utah, Virginia, Nevada, Colorado, Connecticut (consumer privacy statutes)	State consumer-privacy rights (access, correction, deletion, opt-out) with education carve-outs and FERPA interplay.	Amira's Additional Privacy Notices for U.S. Residents document state-specific rights, and Amira honors verified requests, including Global Privacy Control signals.

7.13 SOC 2 as a Compliance Process, and Amira's Adherence

What SOC 2 Is

Systems and Organization Controls (SOC) 2 is the American Institute of Certified Public Accountants' (AICPA) attestation framework for service organizations that hold customer data. A SOC 2 examination is performed by an independent, licensed CPA firm against the

AICPA's Trust Services Criteria: Security (required), plus Availability, Processing Integrity, Confidentiality, and Privacy as applicable. Amira's examination covers the Security, Availability, and Confidentiality trust services criteria. The framework evaluates the design and operation of controls across risk management, access control, change management, system operations, monitoring, vendor management, and incident response. Two report types exist: a Type I report assesses whether controls are suitably designed at a point in time; a Type II report — the more rigorous standard — tests whether those controls actually operated effectively over an extended observation period (typically 6–12 months), with the auditor sampling evidence throughout. A Type II report is therefore not a questionnaire or self-certification: it is a sustained, evidence-based, independent examination, renewed on a recurring cycle, resulting in a formal attestation report that customers may review under NDA.

Amira's Adherence

Amira maintains SOC 2 Type II compliance, verified by independent auditors. The examination scope covers the systems that process student data — including the storage and handling of de-identified audio — and encompasses: continuous security monitoring across infrastructure and systems; strict access controls to prevent unauthorized data exposure; ongoing risk assessments and vulnerability management; and formalized policies and procedures ensuring operational integrity and transparency. Amira's DSA (Exhibit E) contractually commits Amira to maintain a cybersecurity program based on SOC 2 and the NIST family of standards, making the audit not merely a marketing credential but an enforceable obligation to every LEA. Districts may request Amira's current SOC 2 Type II report through their account representative, and the DSA's audit clause provides an independent verification path.

7.14 Conclusion: All Reasonable Steps to Protect Student Privacy

The question any district, parent, or policymaker is entitled to ask of an education technology provider is simple: are you taking all reasonable steps to protect students? For Amira, the answer is yes, and it is documented rather than asserted. Amira collects the minimum data needed to teach a child to read. It binds itself to every district through a controlling Data Sharing Agreement that makes the district the owner and Amira the school official under district direction. It complies with FERPA, COPPA, and PPRA; with the GDPR, UK GDPR, and the EU-U.S. Data Privacy Framework; and with the full lattice of state student privacy and emerging AI statutes, conforming nationally to the strictest common standard rather than the local minimum.

For the most sensitive data class — a child's voice — Amira goes further than any law yet requires: recordings are stored only in de-identified form, encrypted in transit and at rest, held on a single infrastructure subprocessor (AWS) and shared with no other, never used to build voiceprints or biometric identifiers, never exposed to public AI platforms, erasable on district request, and subject to a district's right to disable audio retention altogether. Model improvement occurs only under express district consent, only on de-identified data, and with per-district training exclusions available and applied wherever law or district policy requires.

These commitments are verified by independent SOC 2 Type II auditors on a recurring cycle, enforced by district audit rights, backstopped by 72-hour breach notification, and administered by a dedicated privacy and security team under a designated Privacy Officer. No responsible steward of children's data can promise that risk is zero; what Amira promises — and demonstrates — is that every reasonable step available to a modern education technology provider has been taken, is being taken, and will continue to be taken. Protecting the children we serve is not a compliance obligation Amira discharges; it is a condition of the trust on which our mission depends.

Part 8: Frequently Asked Questions

Implementation and Usage

Q: How much time should students spend with Amira Tutor/Tutora each day?

A: Research shows optimal results with 10–15 minutes per session, 3–4 times per week, totaling about 30 minutes weekly. This can be adjusted based on individual student needs, with struggling readers benefiting from daily sessions and advanced readers using it 2–3 times weekly.

Q: Can Amira Tutor/Tutora replace teacher-led reading instruction?

A: No, Amira Tutor/Tutora is designed to supplement, not replace, teacher-led instruction. It provides application and practice of teacher-led instruction and individualized support for every student, allowing teachers to focus on higher-level instruction and targeted interventions.

Q: How does Amira work with our existing reading curriculum?

A: Amira integrates seamlessly with any reading curriculum through text sets aligned with Core Knowledge topics and district scope and sequence. The AI system can ingest curriculum documents and create aligned text collections that support current classroom themes and instructional focus areas.

Q: What if a student has a speech impediment or strong accent?

A: Amira's speech recognition achieves 96% agreement with human expert judgment and accommodates diverse speech patterns, accents, and speech differences. The system recognizes and accepts diverse accents and dialects while accommodating developmental speech patterns.

Technical and Troubleshooting

Q: What should I do if Amira can't hear a student reading?

A: First, check that the device microphone is working and browser permissions are enabled. Ensure the environment is reasonably quiet and the student is speaking clearly at an appropriate distance (6–8 inches) from the microphone. Try refreshing the browser, clearing the cache, closing any other tabs, unplugging headphones, or switching to a different device if problems persist. For students who are reading quietly, a headset with a microphone can help. If challenges persist, email support@amiralearning.com.

Q: Can students use Amira Tutor/Tutora on smartphones?

A: While technically possible, Amira Tutor/Tutora is optimized for tablets and computers with larger screens for optimal text readability and interface navigation. Smartphone use is not recommended for regular tutoring sessions due to interface limitations.

Data and Progress Monitoring**Q: How often are ARM scores and Skills Diagnostic reports updated?**

A: ARM scores are updated continuously with each tutoring session through the student's Estimated Mastery score. Skills reports (Skills Status, Skills Diagnostic, Standards Mastery) are updated overnight, with new data available the following day for instructional planning.

Q: What's the difference between ARM and MAST scores?

A: ARM (Amira Reading Mastery) is a norm-referenced score measuring overall reading growth compared to national peers, best used for tracking progress over time and understanding a student's reading level compared to grade level norms. MAST (Mastery of Academic Standards & Targets) is a criterion-referenced score showing the percentage of grade-level standards mastered, best used for instructional planning and standards-based grouping.

Q: How should I interpret the Red-Yellow-Green color coding in reports?

A: Red indicates the student needs intensive instruction on specific skills. Yellow suggests continuing current instruction while monitoring progress. Green means the student has likely mastered the skill and instruction can focus on application and advancement. Grey indicates insufficient data is available for determination.

Text Sets**Q: How are text sets assigned to students?**

A: Text sets are automatically assigned to students when the district enables text sets in their configuration settings. Teachers cannot manually assign text sets.

Q: Will students reading below grade level receive grade-level texts?

A: Sometimes. Amira offers multiple text sets at different reading levels when available, and provides scaffolds (including Read With Me mode) to support access to grade-level content. This aligns with Science of Reading principles that all students should access expected-level content with appropriate support.

What's New in SY 2026–27

Q: What's the difference between Amira Tutor and Amira Tutora?

A: Amira Tutor provides AI-powered reading practice and tutoring in English. Amira Tutora provides the equivalent experience for Spanish reading practice, including a Spanish-specific intervention model (see Section 1.4). As of Fall 2026, these are two separately licensed products rather than one combined bilingual product—a district can license Tutor only, Tutora only, or both. Districts that previously had a single bilingual license now hold both Tutor and Tutora.

Q: Why did Amira's Spanish voice change?

A: Starting in Fall 2026, Amira Direct customers' Spanish voice moved to a more natural-sounding engine (ElevenLabs) with revised, native-reviewed speech scripts. This is an intentional improvement.

Q: Why does a student's Tutor Settings page show "N/A" for some fields?

A: This is expected. As of SY 2026–27, English and Spanish tutor settings are only editable when the student's "Practice Reading In" setting includes that language. See Section 3.3 for details.

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