# Product Evaluation by Julie Foss

## Planning for the Evaluation

Identify Product for Review: Grammarly EDU

## My Approach the Evaluation

Because my role is as a consultant and not a member of a school-based team, I will approach the evaluation from the perspective of "questions for organizations to ask" about this tool.

Because I am being asked to help the district evaluate the tool from the perspective of AI governance, I will focus on the areas of the evaluation that relate to the terms of the provider and responsibilities of the deployer for which the district is seeking outside expertise, namely those within domains 2 and 3.

In Domain 2, I will evaluate:
- System Integration: With what systems is Grammarly EDU compatible/ not compatible?
- Bandwidth Requirements: What bandwidth requirements exist for reliable Grammarly EDU performance?
- Reliability and Update: What story to Grammarly EDU's success metrics tell?
- Accuracy and Error Handling: What do Grammarly EDU's error or failure cases reveal that the district might need to be aware of or plan for?

In Domain 3, I will evaluate:
- Data Privacy (GDPR Compliance): How does Grammarly EDU use, store data and meet content and deletion requirements?
- Bias and Fairness: How does Grammarly EDU test for and mitigate bias?
- Transparency (EU AI Act Article 13): How does Grammarly EDU communicate how it works, its limitations, and its intended use?
- Human Oversight (Article 14): Can decisions made by Grammarly EDU be audited, challenged, or overridden by a human?
- Accessibility and Inclusion: How does Grammarly EDU support learners w/ disabilities?

## Sources of Information

I will use the Grammarly EDU website and my experience testing the tool to evaluate Grammarly EDU.

## Evaluation Process

- Completed evaluation rubric for domains 2 and 3
- Red Flags
  - Absence of data on accuracy and error handling
  - Risk level highly dependent upon fidelity of implementation
- Contract Requirements to Highlight
  - The legal basis for data processing is consent. Deployer and provider should work together to ensure.
  - Grammarly's website notes how security breaches will be handled for Business and Individual users but does not mention this specifically for Education users and will need to be verified within the vendor agreement.
  - Grammarly website discusses bias mitigations and representation of its dataset. It does not, however, discuss shared mitigation strategies with deployer partners and contract will need to include this.
  - Contract will need to include a provision for a pilot period if ultimately determined as a recommendation.
- Legal and Ethics Check
  - EU AI Act
    - Use of AI Detector to flag academic integrity violations- recommend prohibiting or ensuring not the sole basis for decisions related to academic integrity concerns. Also recommend clear guidelines for use of Grammarly EDU for written work.
    - IP concerns for use of student work within Grammarly platform- Ensure vendor contract clearly states that all user work is owned by the user. Note, this is stated on the Grammarly website, but bears putting in writing.
    - Use of Grammarly-generated feedback- recommend feedback as a point of discussion for conference between student and

teacher or as first line of review vs. as sole source of feedback student receives or as the basis of a student's grade

- ○ GDPR
  - ■ Lawful basis? Yes, consent
  - ■ Is consent needed? Yes, given user data collected
  - ■ What personal data? The following data is collected any time Grammarly is in use:
    - ● Event time
    - ● Your IP address
    - ● Authorization information, including user ID
    - ● Client or Browser Version, including operating system details.
    - ● Other data collected based upon where the application is being used
- ○ Equity
  - ■ Might it introduce bias? Yes, though the Grammarly team is actively in pursuit of the study, investigation, and mitigation of areas where bias occurs.
  - ■ How to mitigate?
    - ● Grammarly's website outlines ongoing measures taken to reduce and mitigate bias. Users have an option for each use to flag content for bias or offensiveness. Would want to ensure contract language states a way for this to be shared across deployer and provider for the duration of the pilot.
- ○ Interpersonal Aspect:
  - i. I discussed this tool with my daughter who is entering her freshman year of college. She was concerned about having guidance so she knew what was acceptable to the school and what they would constitute as cheating, reflecting an implementation consideration for schools. She was also concerned with being able to turn it off as she said she thought it would be useful as a refinement mechanism, especially with punctuation, but felt like the tool was distracting during writing. This feedback highlights a need for clear school guidance and some training for students and educators who are using this tool during the implementation phase.

2. Decision Framework Document (See below)

# GrammarlyEDU Decision Framework and Evaluation

## Introduction

Grammarly EDU is a digital tool that provides AI-assisted spelling, grammar, and writing feedback to support student learning and writing development. This evaluation examines the tool's technical functionality, as well as ethical considerations including data privacy and transparency through analysis of official documentation and usability testing conducted in July, 2025. To provide a balanced perspective, additional insights were gathered from a current undergraduate student who has used Grammarly EDU through her school's license.

## Summary of Findings

Of the 13 criteria that were evaluated for Grammarly EDU within technical functionality and safety and ethics domains, 11 were met satisfactorily. There was a notable gap in one area and one area that requires further clarification.

Key areas of strength include:

- System Integration: Compatible across multiple platforms and devices
- Data privacy compliance: Certificated compliance with GDPR, COPPA & FERPA
- Bias Testing and Mitigation: Provides ongoing fairness testing and opportunities for users to flag troubling content
- Transparency: Robust information about how data is used, handled, stored, deleted is provided

Areas Requiring Attention:

- Accuracy and Error Handling: This reviewer could not find information about accuracy or error handling on the provider's website.

- Long-Term Educational Impact: Limited available research on potential cognitive offload impact, though this may reflect the emerging nature of AI writing tools and nascent stage of research in this area.

## Detailed Evaluation

The following detailed evaluation examines Grammarly EDU across two critical domains: Technical Functionality and Integration and Ethics, Safety and Compliance.

## Domain 2: Technical Functionality and Integration

| # | Criterion | What to Look For | Check | Comments/ Evidence |
|---|-----------|------------------|-------|--------------------|
| 5 | System Integration | Compatibility with existing systems (e.g. LMS, SIS, Google Classroom, Microsoft 365). | ☑ ~~Fully compatible~~<br>☐ Partially compatible<br>☐ Not compatible<br>☑ ~~Unknown~~ | • Application that the be installed via web browser, computer, mobile device or via the website<br>• Some additional applications are enabled when using GrammarlyEDU via the website |
| 6 | Device and Bandwidth Requirements | Suitable for your school's devices, internet speed, and usage patterns. | ☑ ~~Meets all~~<br>☐ May strain capacity<br>☐ Not suitable<br>☐ Unknown | • Compatible with Windows 10 OS or newer and Google Chrome or Microsoft Edge 89. Most school systems in the US have/will switch to Windows 11 if they haven't already because Windows 10 no longer supported by Microsoft after October 2025 |
| 7 | Reliability and Uptime | System is stable, documented, and has performance metrics or SLAs. | ☑ ~~Reliable~~<br>☐ Occasional issues<br>☐ High risk<br>☐ Unknown | • Effective [communication score data](#) for enterprise and education orgs |

| # | Criterion | What to Look For | Check | Comments/ Evidence |
|---|-----------|------------------|-------|--------------------|
| | | | | • Includes data on the applications w/which users are using Grammarly<br>• Can see tones used by users and high traffic usage times |
| 8 | Accuracy and Error Handling | System returns high-quality, consistent outputs. Known errors or failure cases are disclosed. | ☐ Tested and transparent<br>☐ Some issues<br>☐ Unverified<br>☑ ~~Unknown~~ | • Did not find this information on Grammarly's site. |

## Domain 3: Ethics, Safety, and Compliance

| # | Criterion | What to Look For | Check | Comments/ Evidence |
|---|-----------|------------------|-------|--------------------|
| 9 | Data Privacy (GDPR-compliant) | Vendor provides data processing agreement, explains use of personal data, and meets storage, consent, and deletion requirements. | ☑ ~~Fully compliant~~<br>☐ Needs negotiation<br>☐ Not compliant<br>☐ Unclear | • Certified GDPR, SOPPA, COPPA + FERPA compliant<br>• Website claims to never sell data, data is encrypted, and is stored for 7 days or when you log out of Grammarly EDU (whichever 1st)<br>• You can turn off use of the tool on any application<br>• Writer owns all data<br>• Grammarly records content only when in use<br>• Grammarly does not capture fields that contain sensitive info<br>• Can request a personal data report that shares your personal data being stored<br>• Can opt out of the use of your data being used to train models |

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|---|---|---|---|---|
| | | | | • You can also turn off specific functions of Grammarly (like the AI detector feature)<br>• Data stored on cloud based servers (AWS) in the US<br>• Subprocessors for LLM content also processed in the US<br>• Data deleted w/in 30 days of closing account |
| 10 | Bias and Fairness | Vendor has evaluated the system for bias across race, gender, disability, language, etc. and shows evidence of mitigation. | ☑ ~~Strong evidence~~<br>☐ Some awareness<br>☐ No assessment<br>☐ Unknown | • Users can flag content they believe is harmful or offensive<br>• Filter and flag LLM suggestions deemed as harmful<br>• Datasets undergo bias and fairness testing<br>• Product teams include analytical linguists who use their expertise and research to mitigate and minimize bias and apply the feedback received from users |
| 11 | Transparency (EU AI Act Article 13) | Clear explanation of how the system works, its limitations, and intended use. | ☑ ~~Fully transparent~~<br>☐ Somewhat transparent<br>☐ Vague<br>☐ Marketing only | • Website contains both a technical explanation of how it works and a detailed privacy policy around the capture, use, storage and deletion of data<br>• Promotes transparency of users as well as feature to cite when and how Grammarly was used in writing |
| 12 | Human Oversight (Article 14) | AI decisions can be audited, challenged, or overridden by a human. Not fully autonomous. | ☑ ~~Human-in-the-loop~~<br>☐ Optional<br>☐ None<br>☐ Not applicable | • Users do not have to choose to use Grammarly's suggestions and can turn off use of Grammarly with specific applications or altogether |

| 13 | Accessibility and Inclusion | Supports learners with disabilities. Compatible with screen readers, has alt text, captions, etc. | ☑ ~~Meets standards~~<br>☐ Limited<br>☐ Unknown | Grammarly needs access to the accessibility features on your OS, which need to be set up by the user. Once set up, yes, Grammarly is accessible with:<br>● Firefox with NVDA on Windows<br>● Chrome with JAWS on Windows<br>● Safari with VoiceOver on macOS |
|---|---|---|---|---|

## Recommendations

**Conditional Adoption with Pilot Implementation Recommended**

Based on this evaluation, I recommend moving forward with a limited pilot of Grammarly EDU. While the tool demonstrates strong technical functionality and robust privacy protections, the educational impact and associated risks are very much dependent upon how the tool is deployed and used within the school setting.

**Recommendations for Pilot Implementation:**

1. **Provide Guidelines for Use**
   - Low-risk applications: Student or educator use for individual writing refinement, grammar, and initial feedback on written drafts should include guidance for how to cite use of Grammarly
   - High-risk applications: Teacher use of Grammarly EDU for grading or assessment purposes or teacher use of Grammarly EDU to generate feedback to students without reviewing it
   - Articulate Prohibited Use Cases: Recommend use of AI detector feature as a prohibited use case given the research on reliability and potential for elevated identification of AI generated content by English learners. Also recommend explicit guidance that Grammarly EDU not be used to rewrite student essays without metacognitive pieces in place as to why students accept specific recommendations

2. **Provide Training for Students and Staff**
   - Content of training should include how to use the tool to optimize writing, the tool's capabilities and limitations, how to flag concerning content, opt out, engage accessibility features, and dialogue about ethical considerations and expectations for students and educators.
   - Quick guides should be shared with educators for classroom or at home use with students
3. **Implementation Safeguards**
   - Disable the AI detection feature for all pilot participants due to accuracy and bias concerns
   - Establish clear guidelines around human oversight of feedback provided by Grammarly
4. **Pilot Evaluation Framework**
   - Set a concrete timeline for the pilot with clear goals about what you want to learn in that time (Recommend 3-6 months)
   - Collect baseline data and ongoing feedback throughout the pilot from students and educators
   - Review and analyze the analytics generated by Grammarly during the pilot period as well as educator data that speaks to student writing performance
   - Review any unintended consequences that surfaced during the pilot and include as part of the risk assessment of Grammarly EDU
5. **Vendor Agreement**
   - Request information from Grammarly EDU about their accuracy data and known failure cases
   - Request technical support during the pilot
   - Consider partnering with Grammarly EDU to publish a case study on educational impact using data from the pilot and feedback from students and educators

Recommend a decision be made after reviewing pilot results feedback from students and educators, particularly with regard to the fidelity of implementation and the organization's confidence in their ability to replicate that at scale. Full adoption should only move forward if the pilot demonstrates educational benefit without a cost to student learning or rights.

## Appendices

 You can attach the filled rubric, the completed vendor Q&A, or any other artifact (like an email from the vendor). In a GitHub repository, these could be separate files linked from your README or main doc.

Appendix 1: [Grammarly EDU Product Evaluation - Google Docs](#)

Appendix 2: [Grammarly for Education | Grammarly](#): Source of responses to vendor evaluation questions.