

# THE WILLIAM D. RUCKELSHAUS CENTER

UNIVERSITY OF WASHINGTON

## **Consistency, Simplicity, Transparency, and Accountability in Education Data in the State of Washington**

### **Workgroup Report and Recommendations**

Prepared for the Washington State Legislature  
by the **William D. Ruckelshaus Center**

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## **List of Common Acronyms**

A/E	Audit and Evaluation
AAG	Assistant Attorney General
CEDR	Center for Education Data and Research at the UW
CEDS	Common Education Data Standards
COP	Council of Presidents
DCYF	Department of Children, Youth and Families
DSA	Data Sharing Agreement
DSHS	Department of Social and Health Services
ECEAP	Early Childhood Education and Assistance Program
FERPA	Family Educational Rights and Privacy Act
FPCO	Family Policy Compliance Office
ERDC	Education (Research) Data Center
ESD	Employment Security Department
ESIT	Early Support for Infants and Toddlers
EU GDPR	European Union General Data Privacy Regulations
HEC Board (former)	Higher Education Coordinating Board
IDS	Integrated Data System
IES	Institute of Education Sciences
IHEs	Institutes of Higher Education
IPEDS	The Integrated Postsecondary Education Data System
JLARC	Joint Legislative Audit and Review Committee
LEAP	Legislative Evaluation and Accountability Program
MOA	Memorandum of Agreement
NSC	National Student Clearinghouse
NWCCF	Northwest Career Colleges Federation
NWCCU	Northwest Commission on Colleges and Universities
OCIO	Office of the Chief Information Officer
OFM	Office of Financial Management
OSPI	Office of Superintendent of Public Instruction
P4L	Partnership for Learning (Washington Roundtable)
PCHEES	Public Centralized Higher Education Enrollment System
PII	Personally Identifiable Information
RUG	Resident Undergraduate (usually in reference to tuition)
SBCTC	Washington State Board for Community and Technical Colleges
SLDS	State Longitudinal Data System
SNG	State Need Grant
SOC	Standard Occupational Classification
STEM	Science, Technology, Engineering, and Mathematics
SWIS	State Wage Interchange System
WA KIDS	Washington Kindergarten Inventory of Developing Skills
WSAC	Washington Student Achievement Council
WSIPP	Washington State Institute for Public Policy

# Introduction

The Washington State Legislature (in the 2019-2021 Operating Budget) provided funds for the William D. Ruckelshaus Center (The Center) for fiscal year 2020 to design and facilitate a collaborative effort to improve “consistency, simplicity, transparency, and accountability in higher education data systems.” In the proviso (shown in [Appendix A](#)), the Legislature required input and representation from the following agencies and institutions:

- Washington Student Achievement Council (WSAC),
- Workforce Training and Education Coordinating Board (WTB),
- Employment Security Department (ESD),
- State Board for Community and Technical Colleges (SBCTC),
- The four-year institutions of higher education<sup>1</sup> (referred to as public 4-years, and often represented by the Council of Presidents organization),
- Education Data Center (ERDC),
- Office of the Superintendent of Public Instruction (OSPI),
- Washington State Institute for Public Policy (WSIPP),
- Joint Legislative Audit and Review Committee (JLARC), and
- “At least one representative from a non-governmental organization which uses longitudinal data for research and decision making” (a role filled by the National Center for Analysis of Longitudinal Data in Education Research and Washington STEM).

The Center identified appropriate representatives from each entity named in the legislative proviso along with several interested and affected parties who could add useful perspectives and contribute to potential solutions to the challenges identified in the process. To include all relevant perspectives, the Center invited these entities to join the workgroup’s conversations. Workgroup members (including representatives from the agencies and organizations named above and other knowledgeable entities) provided input before the meetings convened via individual interviews (by phone and in person) with the Center’s project team. [Appendix B](#) shows a full list of workgroup participants.

The workgroup met for six three-hour meetings in Olympia, facilitated by The Center, from September to December 2019. Each meeting had between 15-35 total participants (in person, by phone, and using videoconference technology). Meeting summaries in [Appendix C](#) list in-person and phone/video-conference attendees for each meeting. After collaboratively articulating characteristics of an ideal education data landscape and identifying shared policy values, the workgroup considered the current education data landscape then turned its attention to challenges and opportunities.

The legislative proviso tasked the workgroup with recommending:

- *Opportunities to increase postsecondary transparency and accountability across all institutions of higher education that receive state financial aid dollars while minimizing duplication of existing data reporting requirements;*
- *Opportunities to link labor market data with postsecondary data including degree production and postsecondary opportunities to help prospective postsecondary students navigate potential career and degree pathways;*

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<sup>1</sup> The Council of Presidents provided primary representation for the public four-year institutions, with some participation from UW, WSU, and Central Washington University, in workgroup meetings along with some member institutions of the Independent Colleges of Washington (ICW) and representatives of ICW itself.

- *Opportunities to leverage existing data collection efforts across agencies and postsecondary sectors to minimize duplication, centralize data reporting and create administrative efficiencies;*
- *Opportunities to develop a single, easy to navigate, postsecondary data system and dashboard to meet multiple state goals including transparency in postsecondary outcomes, clear linkages between data on postsecondary degrees and programs and labor market data, and linkages with P-20 data where appropriate. This includes a review of the efficacy, purpose, and cost of potential options for service and management of a statewide postsecondary data dashboard; and*
- *Opportunities to increase state agency, legislative and external researcher access to P-20 systems in service to state education goals*

As the meeting summaries ([Appendix C](#)) show, the workgroup spent a great deal of time discussing the federal Family Education Rights and Privacy Act (FERPA) as well as related privacy requirements and concerns. The group acknowledged that researchers, policymakers, agency staff, and the public require different types of data for different purposes. These parties also face varying data fulfillment constraints and options. Some data can be released in anonymized and aggregated form, while other needs require individual unit records. The group identified multiple challenges related to the need to protect the privacy of students while also striving to fulfill the policy goal of transparency, with these two objectives framed, at times, as in tension with each other. The complexity of the system (e.g. at least eighteen different education data dashboards already exist, maintained by six separate agencies, as seen in [Appendix F](#)) also presents challenges related to simplicity and consistency.

Still, the group identified several opportunities to enhance consistency, simplicity, transparency, and accountability in higher education data systems including adding (and enhancing existing) linkages to early learning, K-12, and labor market data. The link in the second bullet below marks the full set of recommendations toward these opportunities, with context in both the sections entitled:

- [Policy Goals: Simplicity, Consistency, Transparency, Accountability](#)
- [Recommendations Outlining Opportunities \(a\) – \(e\)](#)

## Overview of Collaborative Process

Before convening the workgroup, the Center's project team interviewed a total of 53 individuals to assess the issues and interests of the key parties involved and to guide the design of the collaborative workgroup process. During these interviews, the Center identified several additional interested and affected parties worthy of inclusion in the workgroup:

- Department of Children, Youth and Family (DCYF)
- Department of Licensing
- Office of Financial Management (OFM)
- External Researchers
- House College and Workforce Development staff
- Independent Colleges of Washington (ICW)
- Legislative Evaluation and Accountability Program (LEAP)
- Northwest Career Colleges Federation (NWCCF)
- Office of the Chief Information Officer (OCIO)
- Office of the Governor staff
- Results Washington
- Senate Higher Education and Workforce Development Committee staff

- Senate Ways and Means Committee staff
- Washington Roundtable's Partnership for Learning (P4L)

The assessment revealed several key themes, primary among them:

- a) General agreement and acknowledgement of Washington State as a leader in high-quality educational data and P-20 W<sup>2</sup> (preschool to high school, college, and the workforce) longitudinal data systems;
- b) While the ERDC data and P-20W warehouse infrastructure is high quality and robust, multiple parties articulated difficulties accessing it or accessing it in a timely way;
- c) Potential exists to evolve the system toward consolidated, integrated, cloud-based storage with real-time updates and cross-sector analytics<sup>3</sup>;
- d) Connecting individual-level *educational* data to *non-educational* data for analysis would benefit researchers and decision-makers<sup>4</sup>; and
- e) Greater cross-agency sharing of linked, matched, recent data would be worthwhile, if student privacy is ensured.

For a complete list of assessment themes, see [Appendix D](#).

### Conditions Favorable to a Collaborative Process

Based on work by the National Policy Consensus Center at Portland State University, the Ruckelshaus Center has developed a set of criteria to gauge when a collaborative process is likely to succeed. It is worth noting that not all these conditions applied to this set of issues and key parties at the time the legislative proviso directed this work to occur. These conditions include:

1. No constitutional rights or basic societal values at stake
2. Primary parties are identifiable and willing to participate
3. Potential areas for agreement; multiple issues for trade-offs
4. Each party has a legitimate spokesperson
5. Potential deal-breaker entities are at the table
6. No party has assurance of a much better deal elsewhere
7. Parties anticipate future dealings with each other
8. Adequate resources and funding to support the effort; realistic timeline for completion
9. Relative balance of power among the parties
10. External pressures to reach agreement

Since Washington residents' rights to privacy lie at the heart of many of the workgroup's deliberations, potential recommendations had to consider what is legally permissible, not just what is desirable. Also, with only five months between when the funding for this project became available and the final report was due, the timeline was not realistic to fully discuss and address the multiple complex issues inherent in the education data landscape. While most of the other conditions existed to some degree, the constraints of time challenged the workgroup's ability to fully explore topics and to address the complexities within some of the recommendations. This impacted the workgroup's

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<sup>2</sup> Adding the "W" to P-20 extends the data coverage beyond education to the workforce.

<sup>3</sup> While such a system would require significant state budget allocations and take years to develop, interviewees suggested it could increase transparency, consistency, simplicity, AND accountability. Albeit within another sensitive policy sector, this "[Reducing Recidivism with Technology](#)" report describes (on page 9) how Arkansas executed a multi-agency data-sharing agreement to enable the creation of a real-time dynamic data model.

<sup>4</sup> The workgroup provided multiple examples of cross-sector research questions that require both education and non-education sector data, which have been difficult to answer. For instance, it was noted that the Legislature recently asked to track education and employment outcomes for women and girls who interacted with both the child welfare and juvenile justice systems.

ability to fully flesh out recommendations (toward all the proviso's objectives) while trying to understand the complexities of and address the tensions between privacy and researcher access to individual-level data.<sup>5</sup>

## What is Education Data?

Education data refers to information gathered by and about educational institutions and programs. This includes operational data, financial data, and information about students as they move through early learning, K-12, and postsecondary (the legislative proviso authorizing this workgroup directed that the data considerations include workforce data and include ESD). Multiple agencies and institutions collect data about individual students, called "student-level," "record-level," or "individual-level" data, for multiple purposes (e.g., operational, outcome tracking, financial, reporting). These data, when summarized across a given group, institution, program, sector, agency, or other broad level, are called "aggregate" data.

### **Note on terminology:**

Workgroup participants describe "cross-sector" as spanning more than one of the following P-20W sectors:

- Early learning (Pre-K);
- K-12;
- Postsecondary; or
- The workforce

This stands in contrast to other uses of the term "cross-sector," which might refer to education as a broad sector in consideration with non-education realms such as health, human services, criminal justice, commerce, natural resources, etc. To accurately reflect this workgroup's conversations, this report explicitly states when the latter definition of "cross-sector" applies by describing it as "education data in combination with non-education data."

## Characteristics of an Ideal Education Data Landscape<sup>6</sup>

The workgroup discussed what an ideal State education data landscape might resemble. Their ideas included:

- Policymakers and the public able to see key metrics, particularly enrollment data, across the entire postsecondary system (i.e., public and private four-year institutions, public community and technical colleges, private career schools, apprenticeships, and career training programs) in one place.<sup>7</sup>
- Complete map of the data landscape, including sources, so folks can understand what data exists, who collects it, where to access it, and how to use it.
- Complete and accessible data dictionary, so folks know what is available (where and in what format).

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<sup>5</sup> This can be seen in the "Commentary" and "Context and Considerations" sections following the Recommendations section.

<sup>6</sup> This set of high-level characteristics is not meant to be exhaustive or definitive. It represents a brainstorm of elements that could provide multiple benefits if realized in the future.

<sup>7</sup> Integrated Postsecondary Education Data System (IPEDS) may capture some of this; however, it is limited to entities eligible to participate in the federal student loan program, thus excludes most private career colleges in Washington state. Similarly, IPEDS data reporting is often delayed by a year or more and therefore is not always useful. ERDC already collects and connects much of this data. A suggestion emerged to have ERDC's warehouse include all postsecondary sectors, reporting on a quarterly rather than annual basis, understanding that different types of institutions report using different categories.



- Where useful and possible, secure buy-in from all data providers about clear and common definitions of variables included in data sets.
- Clear, expedited, and adequately-resourced process to fulfill data requests that serve state education goals.
- Ability to track students in state-funded programs over time, from early learning to workforce (P-20W).
- Ability to link education data to non-education data across agency systems (e.g., DSHS, health agencies, Department of Corrections, etc.) to capture a holistic view of students and to inform policies aimed at closing the opportunity gap.
- Improved responsiveness and accessibility of current P-20W data system. Washington is a national leader in data warehouse systems, the issue is access.
- A system that aligns data reporting requirements so institutions send data to only one place (where it can then be linked).
- Institutions asked to provide data in a logical and manageable way: i.e., reporting it once (vs. multiple ad hoc requests) to the place where it can be accessed for various appropriate purposes.
- Outcomes connected to financial data (e.g., link outcomes to what students pay and institutions spend for various programs, degrees, certificates, etc.).<sup>8</sup>
- Clear distinction between operations data and longitudinal/outcome data.
- Improved understanding of the level of data aggregation/granularity needed and in what format; some information is best displayed in dashboard format, while research drawing causal links may need access to student-level records.
- High-quality data across the entire postsecondary system (currently, data collection capacity and the level of sophistication varies across postsecondary institutions).
- Clear, efficient process for protecting the privacy of individuals (e.g., students).

## Washington's Current Education Data Landscape

With more than a dozen different state agencies involved along with multiple entities within the US Department of Education (e.g., IPEDS and the National Center for Education Statistics, and the Privacy Technical Assistance Center), Washington state has an immensely complex system of education data collection, matching and cleaning, storage, sharing, and reporting.

Of the many agencies and institutions that collect education data, most if not all contribute some data to ERDC. These data providers include:

- [Department of Children, Youth, and Families](#) (DCYF; among other things, DCYF monitors and regulates early learning and child care providers);
- [Office of Superintendent of Public Instruction](#) (OSPI, which administers K-12 education programs and initiatives throughout the State of Washington);
- [Washington Student Achievement Council](#) (WSAC, which administers programs designed to help students advance to higher levels of education and operates state student financial aid programs);
- Public four-year Institutions (Each institution reports to OFM);
- [Independent Colleges of Washington](#) (ICW, listed on the ERDC website as “a private association that represents the financial and policy interests of private, non-profit four-year higher education institutions in the state” and self-described as “a 501(c)(3) membership association of not-for-profit, private colleges and

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<sup>8</sup> Currently, this information is requested ad hoc from institutions and these requests can be burdensome to respond to.

universities located in the state of Washington.”) ICW institutions have made data available only for selected Legislative reports only;

- [State Board for Community and Technical Colleges](#) (SBCTC, which monitors and regulates public community and technical colleges in the State of Washington);
- [Workforce Training and Education Coordinating Board](#) (or Workforce Board, a state agency that oversees workforce development programs in the State); and
- [Employment Security Department](#) (ESD, a state agency that administers unemployment programs and initiatives in the State)

## **Context**

Since 2009, Washington State (primarily ERDC, as Washington’s primary “authorized representative”) has received more than \$27M in federal grants to design, build, and maintain a State Longitudinal Data System (SLDS) meant to house and link data from multiple state agencies, including for example, information on early learning programs (overseen by DCYF) through K-12 (OSPI), postsecondary (multiple state and federal agencies), and the workforce. With ERDC as the locus, Washington has established an Integrated Data System (IDS), in which data gets collected in a central repository. This stands in contrast to a federated system, in which multiple agencies maintain data that gets cross-linked to confederate information on each person in the system.

From the intended outcomes of Washington State’s 2010 SLDS Grant Application for a P20 State Longitudinal Education Data System: “[t]he goal is to generate a clear process that will accelerate the ability to share linked individual-level data while also protecting individuals’ privacy.” The successful application specifies that ERDC will create a “data-sharing ‘clearinghouse’ or central place to field data requests and agreements,” similar to a suggestion that arose during this workgroup’s discussion on September 10, 2019 to establish a “funnel” agency to field postsecondary data requests. A workgroup member indicated that the original vision, as outlined in the SLDS Grant, has not been fully realized,<sup>9</sup> with the current arrangement (researchers and legislative staff often contacting each institution or agency separately to obtain data) perceived by some as inefficient.

Workgroup participants (in assessment interviews and workgroup meetings) spoke of how other states view ERDC’s SLDS design as exemplary, and many described ERDC’s excellence in collecting, cleaning, and maintaining education data. However, as mentioned, workgroup members from multiple sectors described challenges accessing the data needed to analyze policy or research questions—whether accessing the data at all, or in a timely manner.

ERDC maintains data-sharing agreements with the entities in the bulleted list above. ERDC currently accepts data from providers in any form. Workgroup members suggested that ERDC could develop a more efficient structure for data transmission in the future to mitigate the workload involved with cleaning and translating data.

When ERDC receives a request for student-level data, a staff member from ERDC goes to the data provider with the research question to ask if the data provider will authorize redisclosure of the student data. If or when redisclosure requests are denied, ERDC has indicated they would rather not be in the position to have to defend either the data provider(s) or the data requester(s).

Some opportunities for improvement in these processes did emerge in the workgroup’s conversations. This report includes those opportunities in the Recommendations section.

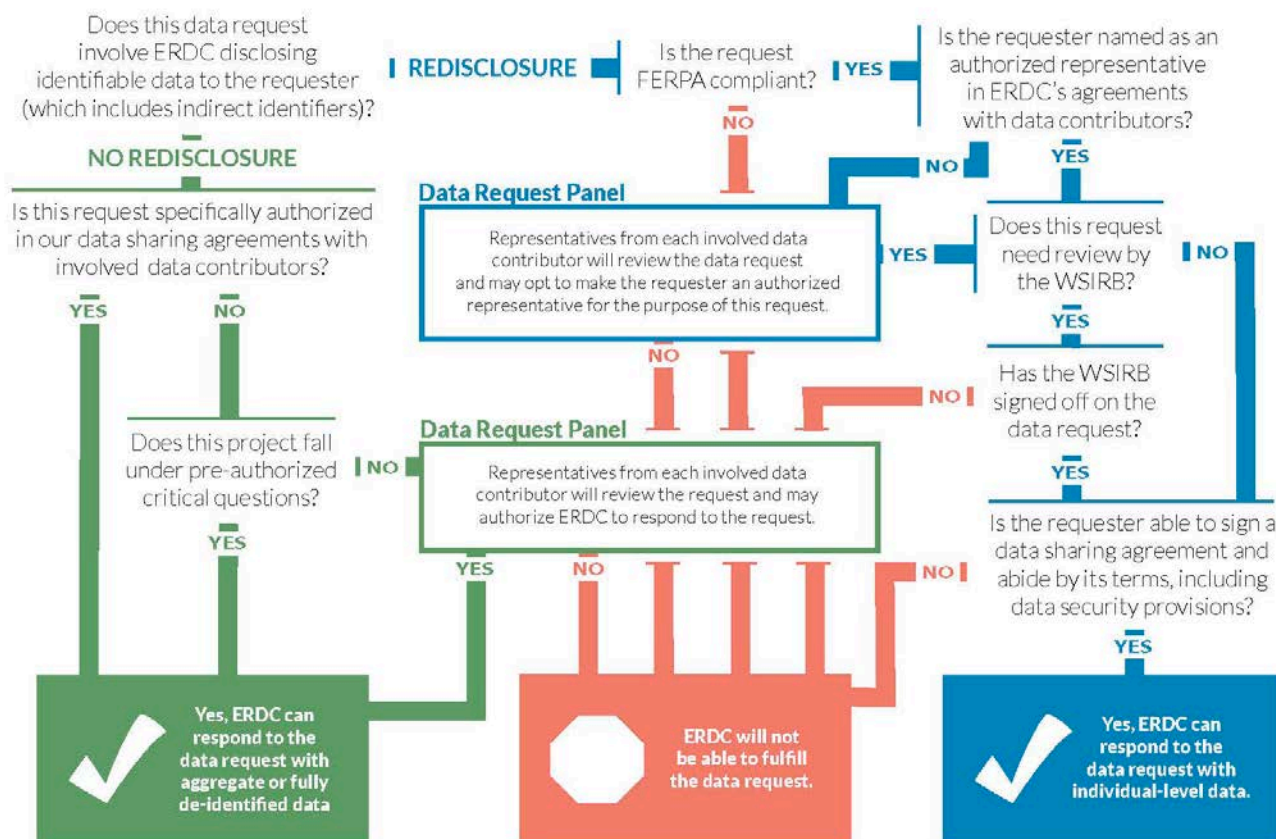
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<sup>9</sup> ERDC does not share this view, noting that the SLDS grant was completed to the satisfaction of the US Department of Education.

## ERDC Data Request Process

Based on assessment interviews and workgroup discussions, multiple parties would like to improve access to ERDC data, including improving the agency's response time.<sup>10</sup> The transparency and detailed content of ERDC's request process has improved over the past year and is now available on their website. ERDC representatives noted that the agency rarely denies data requests, but that some requests need altering to enable data provision. ERDC provided the following flowchart depicting the data request-approval process:

### Will I receive data from ERDC?



ERDC provided the following information on its data sharing:

- **Identifiable data.** ERDC will not share direct identifiers (except in rare circumstances). A record-level dataset with many demographic and outcome variables is not a de-identified data set, even if there are no direct identifiers. Such data is considered identifiable data and is protected by FERPA and other privacy laws. The same is true of aggregate data with small cell sizes.

<sup>10</sup> In assessment interviews, participants expressed different opinions about difficulties in obtaining ERDC data: some think ERDC lacks sufficient resources to adequately fulfill requests; others see the agency's process for prioritizing requests as unclear; still others believe it depends on who requests the data, for what use the data is requested, or what level of data the requester(s) seek. ERDC representatives participated fully and faithfully in workgroup proceedings and answered every question put to them. This report attempts to capture the challenges faced by data providers, ERDC, and data requesters as they emerged through this process, including improvements where identified.

- **Aggregate data.** Data that has been aggregated such that no cell or value describes fewer than 10 students, and so that no individual's information can be inferred from the data. When sharing aggregate education data, ERDC follows the redaction rules outlined in [SLDS Technical Brief #3](#).
- **Fully deidentified data.** Record-level data set that includes very few demographic and outcome variables<sup>11</sup>, so that it is not possible to infer the identity of any student therein (even when combined with other available data). To de-identify individual-level education data, ERDC usually requires that there be at least 10 students for every combination of student characteristics.
- **WSIRB review.** The Washington State Institutional Review Board is tasked with reviewing all human subjects research to ensure that ethical, privacy, and other considerations are properly evaluated. ERDC uses the ERDC Preliminary IRB Screen to determine if a data request needs further review by the WSIRB.
- **FERPA compliance.** FERPA refers to the Family Educational Rights and Privacy Act, which outlines the conditions under which education data can be shared without individual consent. ERDC receives education data as an "authorized representative" of state education agencies. ERDC is permitted to share data under the audit and evaluation exception to the rule of non-disclosure without consent.
- **Redisclosure.** This describes when ERDC shares identifiable data it has received to a third party (including data with indirect identifiers or unredacted aggregate data). However, even activities that involve no redisclosure typically involve access to identifiable data by ERDC staff and needs to be authorized by data contributors through data-sharing agreements or pre-authorized critical questions.

The basic steps in the data request process<sup>12</sup>:

1. Researchers fill out a data request form, which ERDC evaluates by considering research methodology (i.e., is redisclosure necessary?) and assessing FERPA compliance (does research request fall under audit or evaluation or other FERPA exception?).
2. ERDC works with individual data contributors to approve all redisclosure requests (regardless of whether they found an initial FERPA concern). When considering whether to redisclose data, institutions look at FERPA and other privacy regulations and principles, indemnification clauses and data security protocols, along with considering the institution's relationships with students and alumni.
3. If a redisclosure request is approved, ERDC works with the researcher to develop a data sharing agreement. Such agreements stipulate what data will be shared, how it will be used, the security protocols the researcher will follow to ensure data privacy and security, and what happens to the data after the research project is complete.
4. When all applicable data-sharing agreements have been signed, the data request enters ERDC's processing queue where ERDC staff will prepare, assemble, and transfer the data.
5. Researchers submit completed draft paper(s) to ERDC for review; ERDC then shares them with data providers.

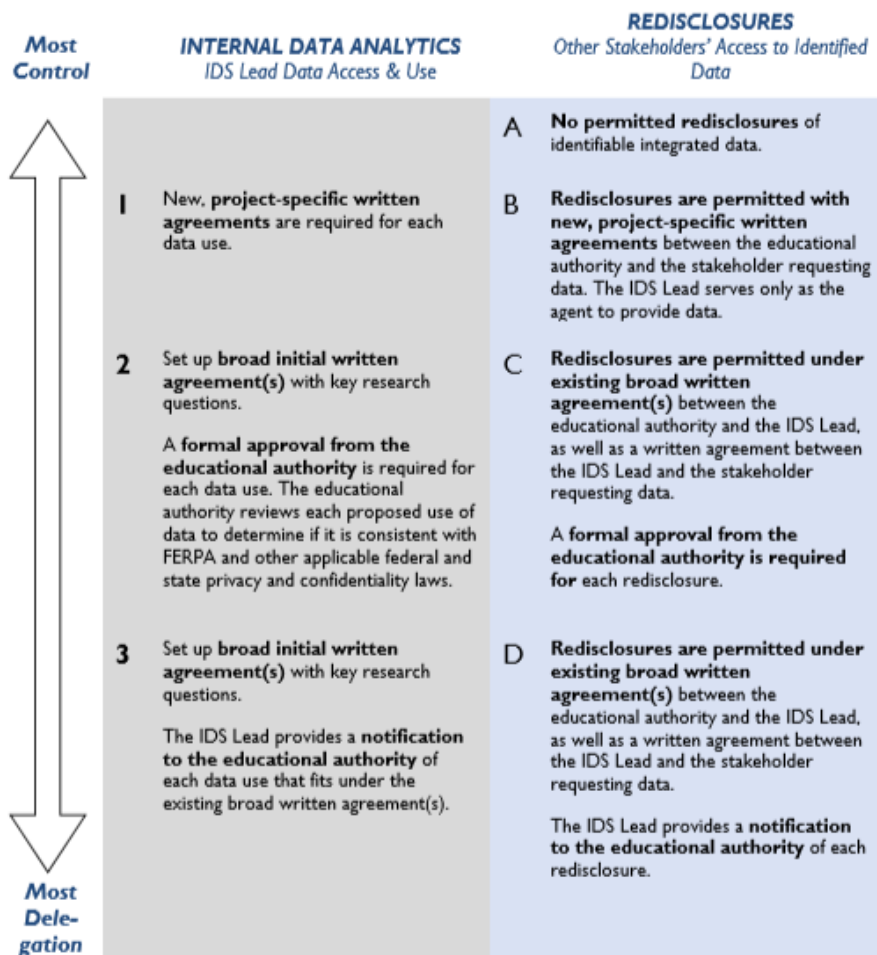
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<sup>11</sup> For full context on levels of data restrictions and ERDC procedures in place to protect them, see [Appendix E](#).

<sup>12</sup> In reviewing this report, a workgroup member submitted comments related to specific steps. [Appendix H](#) shows these steps with comments.

In Washington's current education data analytics system, ERDC creates new, project-specific written agreements for each data use. Federal guidance for state longitudinal data systems depicts a spectrum of control that the central agency can maintain in an IDS, as shown in this graphic.<sup>13</sup>

The options for governance structures are illustrated below. The educational authority should decide which alternative makes sense in the local context for both the internal data analytics and for evaluations and analyses requiring redisclosure.



## Dashboards

Responding to the Legislative proviso's specific reference to opportunities around education data dashboards, the workgroup inventoried and discussed (at its October 18, 2019 meeting) eighteen education data dashboards operated by six different state agencies (see [Appendix F](#)), calling into question the feasibility and practicality of "one dashboard to rule them all."<sup>14</sup>

<sup>13</sup> The Ruckelshaus Center project team conducted background research to find and provide [this graphic from the Privacy Technical Assistance Center \(PTAC\)](#) (page 17). While the workgroup did not specifically discuss it, an opportunity to move toward simplicity could be for ERDC and the other relevant agencies and institutions to move from #1 to #3 in this diagram.

<sup>14</sup> During background research, the Ruckelshaus Center received the following sample dashboards and reports to consider:

<https://alabamaworks.com/successplus/>;

[https://www.kansasregents.org/resources/KansasBoardofRegents\\_2019ProgressReport\\_FINAL.pdf](https://www.kansasregents.org/resources/KansasBoardofRegents_2019ProgressReport_FINAL.pdf);

[https://ir.nevada.edu/strategic\\_plan.php#collapsespm1](https://ir.nevada.edu/strategic_plan.php#collapsespm1); <https://oklahomaworks.gov/launch-oklahoma-metrics/>;

<https://www.sdbor.edu/dashboards/Pages/default.aspx>; <https://higheredutah.org/data/>; and <http://research.schev.edu/>



## Agreements and Data Flow

To develop shared understanding of the education data system(s) in Washington, the workgroup began by considering a data flow graphic provided by ERDC (the colored flowchart with boxes and circles and arrows). The group made several additions, observations, and suggestions, reflected in the added text and purple boxes on this graphic.

### KEY:

- **P20W**- Refers to the full education spectrum, from pre-K through higher education, to workforce.
- **ETL**- Export transfer and load
- **PRO**-Person Role Organization
- **ODS**- Operational Data Store (data marts)
- **PII**- Personally Identifiable Information

**Need:** Desire to understand data sharing constraints beyond FERPA (e.g., agency or sector specific issues) and opportunities.

**Rec:** Develop one central data-sharing agreement; create add-ons for special needs.

**Rec:** Report back to data provider indicating what data was received and how it was validated and linked.

### ERDC Data Requests Prioritization:

1. Requests from Legislature and Partners;
2. Does the request align with ERDC's "critical research questions?"; and
3. Have data providers approved the request?

### ERDC Dashboards:

- Workforce outcomes
- Early learning/feedback report
- High school graduate outcomes
- Public 4-year (PCHEES)

### Data Marts (ERDC research foci)

- HS Grads (into higher ed)
- Kindergartners (for DCYF assessment)
- 9th Graders
- Postsecondary
- Financial Aid

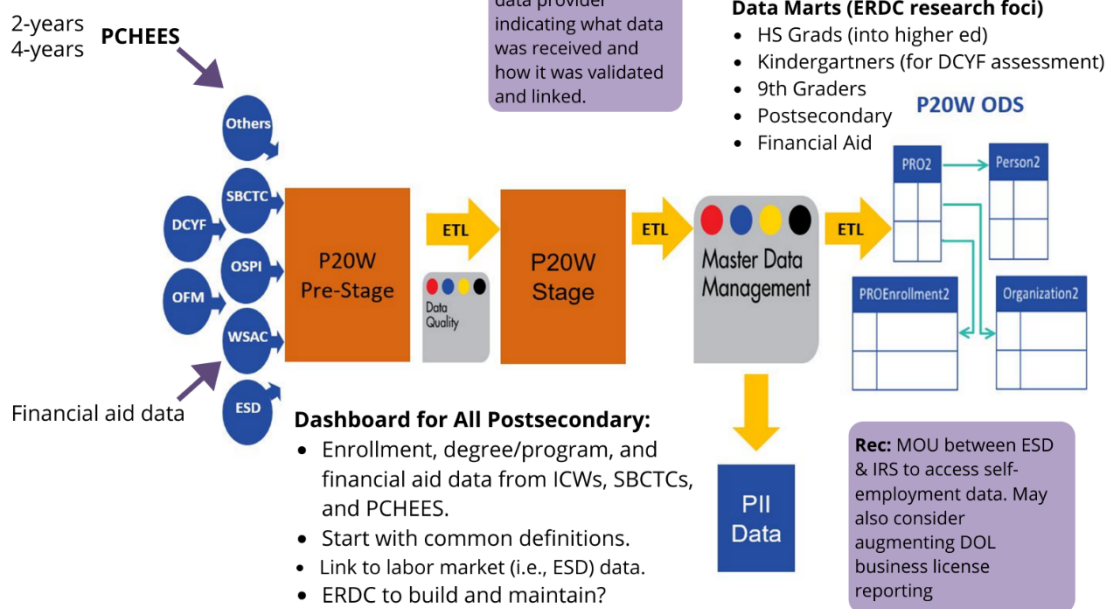
**Rec:** Include ICW, WGU, for-profit institutions, and private vocational schools in "Earnings for Grads" dashboard.

**Rec:** Update data-sharing agreements to improve researcher access to private vocational school data outside of ERDC and WTB. NWCCF indicated schools would like to ensure data accuracy, however ESD cannot ensure self-reported data.

**Need/Gap:** Student data from private and out-of-state institutions is difficult (takes time and money) to integrate into workforce outcomes. More dialog is needed to identify opportunities.

**Need/Gap:** Military and officer training school enrollees data not available. Department of Defense employment data is also not available. More dialog is needed to identify opportunities.

**Rec:** ESD to collect occupation data (i.e., not just industry-level); would require legislative action and county code.



With so many agencies involved in collecting and sharing data in the State, workgroup members emphasized the importance of data governance. As [the ERDC website](#) states:

*Data governance refers to the organizational process that surrounds decisions about how data is obtained, used, stored, shared, and protected. At ERDC, data governance also involves efforts to increase the use of data to improve education, data quality, and organizational coordination and collaboration. ERDC has a [Memorandum of Understanding](#) signed by all [data contributors](#) (listed above), which is used as a guiding document in all data governance decisions.*

## Privacy Considerations in Accessing Data for Policy Analysis

Workgroup members agreed unanimously that protecting student privacy is critical, and the group was united in its respect for FERPA and other legal statutes.

The Family Educational Rights and Privacy Act (FERPA), applies to any educational agency or institution that provides educational services, instruction to students, or is authorized to oversee education institutions that receive, or have received, federal funding. Under FERPA, agencies and institutions must have written consent from parents/guardians or eligible students to disclose personal identifying information (PII) from educational records. [34 CFR part 99.31](#) lists all statutory exceptions to the FERPA PII disclosure consent clause, the most pertinent to this workgroup are:

- The Studies Exception, which allows the disclosure of PII, without prior consent, to third party entities conducting studies for or on behalf of state or local educational agencies. Under FERPA, studies must be closely related to the operation of schools and are limited to a) those that improve instruction; b) administering student aid programs; and c) developing tests.
- The Audit or Evaluation Exception, which allows the disclosure of PII, without prior consent, to authorized representatives<sup>15</sup> for the purposes of auditing or evaluating a federal- or state-supported program; or for enforcing compliance with federal legal program requirements related to education programs.

In addition to FERPA, the workgroup discussed numerous issues, constraints, and considerations related to redisclosure of student-level data by state educational authorities, with privacy protections at the center of these conversations. The following set of bullets covers some key points:

- Multiple workgroup members commented, during dialog about privacy considerations, that “students own their own data.”
- A recent [online article](#) about draft legislation indicates that the State Legislature may consider adoption of laws similar to the European Union’s General Data Protection Regulations (GDPR), including:
  - Consumers would have the right to access, delete, correct, and move their data.
  - Consumers could opt out of data collection.

While that piece of draft legislation addresses private companies (not applicable to state agencies or education data), another has relevance for state agencies and education data: Substitute Senate Bill 5377 (introduced in 2019 Session) proposes GDPR-like data privacy restrictions for data collected and held by state agencies. This bill may become active in the 2020 Session<sup>16</sup>.

- Public sentiment on data privacy is changing rapidly with an increasing interest in protecting personal data.
- Multiple workgroup members expressed concern that data redisclosure requests get denied based on who’s asking for the data. For example, the data might be made available for a legislative mandate, but the same data would not necessarily be released to an independent researcher. This is explained by a legal distinction between legislatively-mandated research and independent research, which permits redisclosure of some data for the former, but not latter.
- When education records are linked to non-education data, FERPA protection applies, unless data is fully de-identified. For more information about data de-identifying methods, see [PTAC web resources](#).
- Researchers do not need actual student/individual names or identifiers, but some research questions require unit record/individual-level data.
- When state law (i.e., legislatively-mandated research) and FERPA both apply, in some cases they may conflict; the Attorney General’s office works to help agencies comply with both on a case-by-case basis.
- The workgroup acknowledged that some questions, irrespective of their research legitimacy, may not be answerable under the current legal parameters. [Appendix G](#) includes a set of three sample questions that are answerable given the current structure and availability of ERDC data, three sample questions that may be answerable, and three that are not currently answerable.

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<sup>15</sup> An authorized representative refers to an individual or entity that has been designated by a state or local educational authority in order to conduct studies, audits or evaluations of education programs, or to enforce compliance with federal legal requirements related to education programs. [RCW 43.41.400\(1\)](#) designates ERDC as an “authorized representative” of Washington educational agencies, allowing ERDC to access and compile student record data for “research purposes,” including allowing redisclosure according to established policies.

<sup>16</sup> Summaries of various state proposals: <https://dataqualitycampaign.org/resource/state-legislators-have-a-role-in-making-data-use-possible/>.

# Considerations on the Policy Goals of Simplicity, Consistency, Transparency, and Accountability

The Legislative proviso outlined four basic policy goals or values. With limited time, the workgroup opted to focus on developing a shared understanding of the data landscape, FERPA and privacy concerns, and data accessibility avenues in order to begin discussing these policy goals.

Some ideas emerged related to consistency and simplicity, e.g., given the fragmentation and complexity of the system, consider adopting the same definitions of certain metrics (e.g., those used by IPEDS<sup>17</sup>), or explore costs and implementation efforts of aligning accounting or database systems across institutions. The workgroup also discussed opportunities to improve transparency and accountability in relation to a) data access (i.e., who is making access decisions and why) and b) educational program, institution, and policy evaluation. As noted, the [Recommendations section](#) contains the full list of opportunities to address the specific improvements requested in the Legislative proviso, with key considerations and context.

## Simplicity and Consistency

Washington's P-20W system is complex, particularly within the postsecondary realm. Public four-year institutions, SBCTC, private career colleges, ICW institutions, and apprenticeship and career training programs use various data collection software and often have different data definitions for key metrics. The decentralized nature of Washington's postsecondary system poses challenges related to data consistency and simplicity. For example, several workgroup members pointed out that only those with long experience and a high degree of institutional knowledge can easily navigate data sources about the State's postsecondary sector. This can be particularly frustrating for Legislative staff and members who may transition in and out of government and often need data to answer questions or fulfill member requests on short timelines.

Although the decentralized nature of Washington's postsecondary system poses challenges related to data consistency and simplicity, there are beneficial and legitimate reasons for some of these complexities. For example, input during a previous Ruckelshaus Center collaborative process indicated that because baccalaureate degree programs do not focus on vocational preparation, assessing employment outcomes for graduates of those programs would not present an "apples-to-apples" consistency when compared with career and technical education or apprenticeship programs.<sup>18</sup>

Still, the workgroup identified some opportunities to improve efficiency within the education data system, as detailed in the [Recommendations section](#). Additionally, more than one assessment interviewee mentioned the hope that data might eventually be connected across all the relevant entities within a future cloud-based storage framework. In such an optimal future system, myriad data providers, sources, and users could connect to a cloud-based catalog with interlinkages that enable real-time automatic updates<sup>19</sup> across the many entities involved. This system would have an online interface cataloging available education data along with data from multiple non-education sectors, with privacy protections incorporated. (Under FERPA, data access could still be restricted and may be based on the proposed research questions.)

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<sup>17</sup> A participant pointed out this dataset would only work for more traditional postsecondary institutions (e.g., two- and four-year institutions).

<sup>18</sup> A participant expressed doubts about this assertion, noting that ERDC already has an employment outcomes dashboard on its website that includes all programs, two- or four-year.

<sup>19</sup> Currently most education and employment data get collected and reported quarterly, at best. Creating a real-time system would require contributing agencies to improve data quality in order to relieve the ERDC of data quality assurance of incoming data.



Reduction of duplicative reporting presents a promising opportunity to improve simplicity. Unfortunately, the project time constraints made it difficult to elicit feedback on specific reporting requirement inefficiencies from the many institutions of higher education affected. [Appendix I](#) includes a summary of the feedback we received.

### **Transparency and Accountability**

The workgroup identified ways to improve transparency and accountability within the data request process by providing additional FERPA and data privacy education and increasing the amount of information available about the status of data requests and instituting an appeal process for cases when requests are denied. To support transparency and accountability in state education policy evaluation, the group examined the utility of creating a map and/or handbook for Legislative members and staff, employees at educational institutions and agencies, and researchers. Additionally, the group discussed ways to incorporate private institutions and programs as well as financial and enrollment data in ERDC's Public Centralized Higher Education Enrollment System (PCHEES) dashboard.

The group also spent significant time and dialogue on how education data can interface with non-educational data to enable "cross-sector" analysis (in the "education with non-education" use of the term, not the "Pre-K with K-12 with higher education" use). This will require future dialog to address potential improvements. The next section provides more details.

# Recommendations

The table below contains the stand-alone set of recommendations, agreed upon by consensus<sup>20</sup>, grouped by the five areas of “opportunities” the Legislative proviso required the collaborative workgroup to address. All but two of the recommendations in this stand-alone table have in-document hyperlinks to contextual information the workgroup discussed (considerations and commentary on responsible parties, implementation pathways, relevant complexities, etc.). Those reading in hard copy can read the contextual information in the similarly formatted table that follows this set of recommendations. Those reading the report on-line can click on the commentary links. There was general agreement that as part of next steps, it would be important to identify what resources are needed for implementation of recommendations and a mechanism for reporting back on progress.

2019 Education Data Workgroup Recommendations	
<i>a) Opportunities to increase postsecondary transparency and accountability across all institutions of higher education that receive state financial aid dollars while minimizing duplication of existing data reporting requirements;</i>	
1.	The Governor and Legislature should consider allocating funding to ERDC to create a postsecondary data dashboard to organize and display important information (e.g., enrollment, retention, completion, financial aid data) from multiple data sources to answer common questions asked by the Legislature in one easy-to-access place. The dashboard could be similar to ERDC’s <a href="#">Public Four-Year (PCHEES) dashboard</a> , but with financial aid and workforce data (already collected by ERDC) from all postsecondary institutions and programs included. JLARC and WSIPP are non-partisan staff who do not take positions that advocate for legislation and therefore abstain from this recommendation. <a href="#">Additional commentary.</a>
<i>b) Opportunities to link labor market data with postsecondary data including degree production and postsecondary opportunities to help prospective postsecondary students navigate potential career and degree pathways;</i>	
1.	To make employment data more complete (and expand coverage beyond the Unemployment Insurance (UI) wage file), ESD should explore whether the IRS can be asked to provide self-employment data. ESD may also consider augmenting DOL business license reporting to collect such information. <a href="#">Additional commentary.</a>
2.	Authorize ESD to require employers to submit occupation-level data on the quarterly UI wage tax file. <a href="#">Additional commentary.</a>
<i>c) Opportunities to leverage existing data collection efforts across agencies and postsecondary sectors to minimize duplication, centralize data reporting and create administrative efficiencies;</i>	
1.	OFM Forecasting and Research Division should conduct a “customer survey” to gauge the utility of its current biennial data-book update requests from individual institutions. Based on OFM’s analysis of customer input, if this reporting (for which most institutions copy information from existing, often publicly-available, repositories) continues, the workgroup recommends streamlining the data-book update process or directing the Forecasting Division to get the information directly from existing data repositories. <a href="#">Additional commentary.</a>
2.	Where possible and not yet in effect, align data definitions with existing definitions from IPEDS, the Common Education Data Standards, or the National Association of Colleges and Employers (NACE). <a href="#">Additional commentary.</a>
3.	Review and inventory current reporting requirements to determine what existing statutes require, what information is obsolete, and what information should be added. <a href="#">Additional commentary.</a>

<sup>20</sup> The workgroup had three meetings (and several opportunities by email) to discuss and refine the recommendations, with the last two meetings focused only on them. To determine consensus on this final set, the Center asked participants whether they (their organization/agency) could “live with” the recommendations. After that last review, only non-substantive changes occurred.

<p><i>d) Opportunities to develop a single, easy to navigate, postsecondary data system and dashboard to meet multiple state goals including transparency in postsecondary outcomes, clear linkages between data on postsecondary degrees and programs and labor market data, and linkages with P-20 data where appropriate. This includes a review of the efficacy, purpose, and cost of potential options for service and management of a statewide postsecondary data dashboard; and</i></p>
<ol style="list-style-type: none"> <li>1. Take steps to consolidate data while considering the feasibility of developing a single dashboard<sup>21</sup> (with information beyond that described in recommendation a-1) as described in the proviso authorizing this workgroup. First steps to consider include: Incorporating selected information from <a href="https://fiscal.wa.gov">Fiscal.wa.gov</a> data into selected dashboard(s) to improve financial transparency. <a href="#">Additional commentary.</a></li> <li>2. Include ICW schools, Washington Governors University, and private vocational schools in ERDC’s “Earnings for Grads” dashboard. <a href="#">Additional commentary.</a></li> </ol>
<p><i>e) Opportunities to increase state agency, legislative and external researcher access to P-20 systems in service to state education goals.</i></p>
<ol style="list-style-type: none"> <li>1. If ERDC now lacks resources or direction to provide data to particular constituencies (data access for state agencies and external researchers was part of <a href="#">prior SLDS proposals</a> to IES), it should consider options to make data more accessible—e.g., propose amending statute <a href="#">RCW 43.41.400</a> to add external researchers to the mission, request proviso moneys—and identify the resources needed to enable this. <a href="#">Additional commentary.</a></li> </ol> <p><b>To improve access to aggregated data for the public, policymakers, state agencies, and university and other external researchers:</b></p> <ol style="list-style-type: none"> <li>2. Create a publicly-available inventory of and plan for updating data resources and dashboards relevant to policymakers across all current state systems. Inventory could include information on origin, intended audience, and location of data. <a href="#">Additional commentary.</a></li> <li>3. As a preliminary step towards improving access, list types of critical/frequent questions asked by Legislative members and staff, researchers, and the public (and perhaps some agency questions) and show inventory users how to find the answers to those questions (i.e., what’s available where). The inventory could include information that instructs the user where data gaps might exist concerning the previously-identified “critical research questions” and other frequent questions as well as limitations regarding the availability of specific data.</li> <li>4. Develop a data researcher’s handbook/directory to answer questions and facilitate access to needed data available online. Identify who is responsible for developing and updating the handbook/directory.<sup>22</sup> <a href="#">Additional commentary.</a></li> </ol> <p><b>To improve access to student-level data for state agencies and external researchers:</b></p> <ol style="list-style-type: none"> <li>5. Consider ways to provide Legislative, agency, and researcher a broader understanding and awareness of student data privacy laws and best practices that may impact data access. Some resources are available via PTAC, however more dialog is needed to determine specifics. This can help ensure research/questions/projects comply with:             <ul style="list-style-type: none"> <li>o FERPA and other privacy related statutes;</li> <li>o Data-sharing agreements (DSAs, to cover acceptable use, etc.);</li> <li>o Public record laws; and</li> <li>o Other constraints.</li> </ul> </li> </ol>

<sup>21</sup> Without a clear definition of “dashboard,” workgroup members found the term confusing. For purposes of deliberating the above recommendations, the workgroup agreed to use the term “dashboard” to refer to the display of publicly accessible aggregated data, as opposed to student-level data which agencies and external researchers access via data-sharing agreements.

<sup>22</sup> ERDC notes that if ERDC is asked to develop and update the data handbook/directory, additional resources would be needed from Governor and Legislature for this.

6. Formalize process for ERDC to confirm what data ERDC received from data providers and how such data was validated, linked, and matched.<sup>23</sup> [Additional commentary.](#)
7. ERDC, in consultation with the LEAP committee and the fiscal and education committees of the Legislature, should establish a clear process or criteria to designate and—per RCW [43.41.400\(2\)\(a\)](#) sections (2)(d), (2)(e), and (2)(j)—periodically update “critical research and policy questions.”<sup>24</sup> [Additional commentary.](#)
8. Enhance ERDC’s [public-facing data request log](#) to track research data requests/applications across institutions, agencies, and individuals. This should include the date each request was submitted, the date of approval/denial, who made the approval /denial decision and for what reason, and, if the data request is approved, and the date data is transmitted to the requester. [Additional commentary.](#)
9. Outline pathways for data requester(s) and data provider(s) to jointly seek opinions about data requests (e.g., from assigned Assistant Attorney General or PTAC), in cases where the data provider denies or requires a modification of a data request.<sup>25</sup> [Additional commentary.](#)

***To increase usage of student-level data for research in service of state educational goals:***

10. Consider broadening the acceptable uses of postsecondary data beyond “legislatively authorized research and evaluation of state postsecondary student aid programs” (as described in HB 2158) to improve data completeness, by including students at private institutions. [Additional commentary.](#)
11. To facilitate research using student-level education data in combination with non-education data and in accordance with FERPA, ERDC should explore and report back on de-identification techniques that could be used to fulfill requests for individual-level records in accordance with [34 CFR 99.31\(b\)\(1\)](#) and reasonable best practices for de-identifying student-level records.<sup>26</sup>

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<sup>23</sup> ERDC notes that additional resources would be needed from Governor and Legislature for this, indicating that for its staff to take on any “new” duties without the agency gaining additional capacity could negatively impact data request fulfillment times.

<sup>24</sup> RCW [43.41.400\(2\)\(c\)](#) indicates that the ERDC collaborate with the LEAP committee and the fiscal and education committees of the Legislature to identify the data to be compiled and analyzed to ensure that legislative interests are served. This collaboration should include the “critical research and policy questions” put forward by state education agencies and institutions, with input from knowledgeable external researchers.

<sup>25</sup> Workgroup participants suggested ERDC would be best positioned to outline such processes, ideally in writing.

<sup>26</sup> ERDC notes that additional resources would be needed from Governor and Legislature to implement de-identification techniques.

## 2019 Education Data Workgroup Recommendations with Commentary

*a) Opportunities to increase postsecondary transparency and accountability across all institutions of higher education that receive state financial aid dollars while minimizing duplication of existing data reporting requirements;*

1. The Governor and Legislature should consider allocating funding to ERDC to create a postsecondary data dashboard to organize and display important information (e.g., enrollment, retention, completion, financial aid data) from multiple data sources to answer common questions asked by the Legislature in one easy-to-access place. The dashboard could be similar to ERDC's [Public Four-Year \(PCHEES\) dashboard](#), but with financial aid and workforce data (already collected by ERDC) from all postsecondary institutions and programs included. JLARC and WSIPP are non-partisan staff who do not take positions that advocate for legislation and therefore abstain from this recommendation.

*COMMENTARY: Prior to HB 2158, no requirement existed for any private four-year institutions to submit this data to the ERDC. Multiple times a year, the Legislature asks about enrollment, retention, completion, and financial aid and, increasingly, student loan data. ERDC could produce an education-system-wide enrollment dashboard using institutional IPEDS reports and adding private vocational schools along with Adult Basic Education information. Further dialog among a set of parties similar to the workgroup (but smaller to make it more manageable) potentially with Legislative members and staff, can identify costs and implementation details of incorporating additional key metrics.*

*b) Opportunities to link labor market data with postsecondary data including degree production and postsecondary opportunities to help prospective postsecondary students navigate potential career and degree pathways;*

1. To make employment data more complete (and expand coverage beyond the Unemployment Insurance (UI) wage file), ESD should explore whether the IRS can be asked to provide self-employment data. ESD may also consider augmenting DOL business license reporting to collect such information.

*COMMENTARY: This suggestion arose, but workgroup members, at a meeting without ESD present, questioned whether it falls within the scope of this workgroup*

2. Authorize ESD to require employers to submit occupation-level data on the quarterly UI wage tax file.

*COMMENTARY: While ERDC can already link some postsecondary data to employment data, this recommendation would enable finer-grained analysis and more complete information. The group noted that this recommendation represents a big undertaking, requiring education and support for employers to ensure buy-in and data quality; however, other states (e.g. Alaska and Indiana) currently require it and the increased level of detail will provide valuable additional insight about higher education and vocational, adult education, apprenticeships, training, and other outcomes. This requirement would require funding and likely a fiscal note. Further legislative action and county codes may also be required.*

*c) Opportunities to leverage existing data collection efforts across agencies and postsecondary sectors to minimize duplication, centralize data reporting and create administrative efficiencies;*

1. OFM Forecasting and Research Division should conduct a "customer survey" to gauge the utility of its current biennial data-book update requests from individual institutions. Based on OFM's analysis of customer input, if this reporting continues (most institutions copy information from existing, often publicly available, repositories), the workgroup recommends streamlining the data-book update process or directing the Forecasting Division to get the information directly from existing data repositories.

*COMMENTARY: The Databook is a comprehensive collection of county-level data tables that cross all domains of data, including employment, education, and natural resources. Agencies and entities*

*representing institutions would need to check if automating the process can occur under their current data storage and reporting systems.*

2. Where possible and not yet in effect, align data definitions with existing definitions from IPEDS, the Common Education Data Standards, or the National Association of Colleges and Employers (NACE).

*COMMENTARY: When similar data elements have different definitions, workgroup members observed that usually the differences have rational explanations.*

3. Review and inventory current reporting requirements to determine what existing statutes require, what information is obsolete, and what information should be added.

*COMMENTARY: More dialog among a set of parties similar to the workgroup could “map” the reporting landscape before determining whether any reporting requirements can be automated or streamlined and gauging the utility of a centralized repository for key educational data metrics.*

*d) Opportunities to develop a single, easy to navigate, postsecondary data system and dashboard to meet multiple state goals including transparency in postsecondary outcomes, clear linkages between data on postsecondary degrees and programs and labor market data, and linkages with P-20 data where appropriate. This includes a review of the efficacy, purpose, and cost of potential options for service and management of a statewide postsecondary data dashboard; and*

1. Take steps to consolidate data while considering the feasibility of developing a single dashboard (with information beyond that described in recommendation a-1) as described in the proviso authorizing this workgroup. First steps to consider include: Incorporating selected information from [Fiscal.wa.gov](https://www.fiscal.wa.gov) data into selected dashboard(s) to improve financial transparency.

*COMMENTARY: More dialog could determine which dashboards to add fiscal data to and which data to include. Consider consulting an entity specializing in human-centered design to evaluate different agencies’ data systems and design an interface to coordinate across the entire education sector. It is important to note that having data flows from institutions/agencies to any central aggregation point would present a significant amount of IT work for institutions/agencies.*

2. Include ICW schools, Washington Governors University, and private vocational schools in ERDC’s “Earnings for Grads” dashboard.

*COMMENTARY: Data from private vocational schools is not currently available outside of ERDC or WTB. Including this data would likely require updating data-sharing agreements. NWCCF indicated schools would like to ensure data accuracy, though it was also noted that ESD cannot ensure the accuracy of self-reported employment data.*

*e) Opportunities to increase state agency, legislative and external researcher access to P-20 systems in service to state education goals.*

1. To increase access for external researchers, ERDC should consider options to do so (e.g., amend statute [RCW 43.41.400](#) to include external researchers to the mission, allocate proviso moneys); ERDC should identify the resources it would need to enable this. JLARC and WSIPP are non-partisan staff who do not take positions that advocate for legislation and therefore abstain from this recommendation.

*COMMENTARY: It is important to differentiate between “program evaluation” and research designed to develop or contribute to generalizable knowledge, which when done using FERPA protected data, is subject to the [federal “Common Rule”](#) (designed to protect human research subjects). It could be worth examining how other states have addressed this in their SLDS’ prioritization of external research, i.e., if external researchers are working to answer “critical research and policy questions,” even if such questions have not been officially designated by the state.*

**To improve access to aggregated data for the public, policymakers, and university and other external researchers:**

2. Create a publicly-available inventory of and plan for updating data resources and dashboards relevant to policymakers across all current state systems. Inventory could include information on origin, intended audience, and location of data.

*COMMENTARY: Further dialogue could identify most appropriate party to develop and update this.*

3. As a preliminary step towards improving access, list types of critical/frequent questions asked by Legislative members and staff, researchers, and the public (and perhaps some agency questions) and show inventory users how to find the answers to those questions (i.e., what's available where). The inventory could include information that instructs the user where data gaps might exist concerning the previously-identified "critical research questions" and other frequent questions as well as limitations regarding the availability of specific data.
4. Develop a data researcher's handbook/directory to answer questions and facilitate access to needed data available online. Identify who is responsible for developing and updating the handbook/directory.

**COMMENTARY:**

- *Further dialogue could identify most appropriate parties to assist ERDC in developing and updating this.*
- *The handbook/directory would provide on-going institutional knowledge about location of different types of data, a data dictionary, list of commonly-used data, processes for accessing data, who to contact for information or questions, etc. This could especially be useful for new legislative and agency staff.*
- *An idea emerged to conduct an anonymous survey to identify opportunities for specific improvements to the data request fulfillment process to address in future conversations; more dialog would enable further development of this.*

**To improve access to student-level data for state agencies and external researchers:**

5. Consider ways to provide Legislative, agency, and researcher a broader understanding and awareness of student data privacy laws and best practices that may impact data access. Some resources are available via PTAC, however more dialog is needed to determine specifics. This can help ensure research/questions/projects comply with:
  - FERPA and other privacy related statutes;
  - Data-sharing agreements (DSAs, to cover acceptable use, etc.);
  - Public record laws; and
  - Other constraints.
6. Formalize process for ERDC to confirm what data ERDC received from data providers and how such data was validated, linked, and matched.

**COMMENTARY:**

- *The workgroup indicated that this is doable. While DSA's articulate specifics of how the data provided by ERDC will be used and other considerations important to data providers, such a procedure would likely better equip data providers to respond to questions they receive about published data or reports. Since such a procedure would ensure high-quality data and allow postsecondary institutions and other data providers to know exactly what data ERDC has and how the data was processed. (This would allow data providers to feel confident in the data to be shared, it and make it easier to sign off on most if not all data access requests.)*



7. ERDC, in consultation with the LEAP committee and the fiscal and education committees of the Legislature, should establish a clear process or criteria to designate and—per RCW [43.41.400\(2\)\(a\)](#) sections (2)(d), (2)(e), and (2)(j)—periodically update “critical research and policy questions.”<sup>27</sup>

*COMMENTARY: These critical questions should include, but not be limited to, legislatively-directed studies. This would enable increased timely access to specific data to assess progress toward state educational goals and potentially useful policy interventions. More dialog among a set of parties similar to the workgroup could identify an appropriate process or set of criteria.*

8. Enhance ERDC’s [public-facing data request log](#) to track research data requests/applications across institutions, agencies, and individuals. This should include the date each request was submitted, the date of approval/denial, who made the approval /denial decision and for what reason, and, if the data request is approved, and the date data is transmitted to the requester.

**COMMENTARY:**

- *While workgroup members requested estimated data request fulfillment times, ERDC noted that providing these would be extremely difficult given the variety of factors that affect the timing and transfer of data.*
- *To improve consistency and transparency, this information site should include a dropdown menu for reasons why a given data request could not be fulfilled (e.g. “X agency stated request does not meet FERPA exemption threshold” or “X agency determined the research question is not valid”) and what office of the agency or institution made the decision.*
- *Including information on which specific agency (and ideally which section of the agency) would enable problem-solving between the data requester and prospective provider.*
- *The suggestion emerged that State education authorities should consider creating a publicly-available data-sharing dashboard for transparency. Such dashboards should be limited to cases where data-sharing agreements exist (as opposed to every time an aggregate report is run).*
- *The suggestion emerged to have ERDC offer an anonymous survey for data requesters to communicate their needs by including questions on how clear the process is, the responsiveness to a data request, whether the requester received the data needed for a project, and whether the data included privacy protections.*
- *Representatives from PTAC have offered to assist with FERPA interpretations, including reviewing researcher data requests, free of charge.*

9. Raise awareness about pathways for data requester(s) and data provider(s) to jointly seek opinions about data requests (e.g., from assigned Assistant Attorney General or PTAC), in cases where the data provider denies a data request.

*COMMENTARY: Considerations are several and include FERPA (PTAC specialty), GDPR, and whether the specific data are necessary for the study and methodology.*

**To increase usage of student-level data for research in service of state educational goals:**

10. Consider broadening the acceptable uses of postsecondary data beyond “legislatively authorized research and evaluation of state postsecondary student aid programs” (as described in HB 2158) to improve data completeness, by including students at private institutions.

*COMMENTARY: The workgroup discussed amending HB2158 but recognizes this might not prove feasible. In addition, at least one participating entity feels this recommendation is overly broad.*

<sup>27</sup> A workgroup member pointed out that statute gives direction for periodic updates to critical research questions but that those updates had not taken place yet.



11. To facilitate research using student-level education data in combination with non-education data and in accordance with FERPA, ERDC should explore and report back on de-identification techniques that could be used to fulfill requests for individual-level records in accordance with [34 CFR 99.31\(b\)\(1\)](#) and reasonable best practices for de-identifying student-level records.

## Additional Context and Considerations to support recommendations

- **More dialog is needed to ascertain feasibility and utility of a single statewide postsecondary data dashboard.**<sup>28</sup> Recommendation a)-1 identifies an opportunity to combine some key data from across Washington’s higher education sector, though future dialogue is needed to gauge efficacy and cost. That conversation should involve a similar set of interested and affected parties and first identify what exists now (and where), whether the way data is collected and stored can align across multiple agencies, before considering what it would take to consolidate this data into a common spot and whether it would be beneficial enough to make it worth the investment and maintenance. Additionally, such a process should identify and make clear to interested parties the “critical research questions,”<sup>29</sup> create common definitions, and specify fiscal and FTE considerations.
- **No common set of data definitions.** While consolidating existing dashboards could improve simplicity and reporting consistency, assisting Legislative members and staff, it presents challenges. Some workgroup participants support having institutions submit data (summary or unit-record) that uses currently existing data definitions, be they IPEDS, Common Education Data Standards, or National Postsecondary Student Aid Study (NPSAS). Of these the workgroup discussed requiring the use of IPEDS data definitions but this has drawbacks, specifically:
  - IPEDS data definitions may not align with institution-specific definitions in Washington.
  - Reliance on IPEDS data also omits private vocational schools, Adult Basic Education information, and most apprenticeship programs.
  - It may result in a reporting lag, though ERDC may be able to address lag time by cleaning and linking IPEDS data in-house.
- **The importance of cross-sector**<sup>30</sup> **policy research.** Workgroup members noted that education data should not be examined in a silo, cut off from other human services that students and their families receive and that likely impact individuals’ performance and outcomes. Further discussion is needed to better facilitate cross-sector (using both education and non-education data) research, while ensuring data privacy and security under FERPA.
- **Different data users have different needs.** The workgroup noted that Legislative and public (i.e., online) access to data differs tremendously from the needs of some researchers, while state agencies represent yet another category of data consumer with varying needs related to type, level (aggregate vs. student-level), and timing (quarterly vs. annually) of data.

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<sup>28</sup> One workgroup member strongly advised against combining public and private dashboards, especially for financial aid, describing the funding models as quite different and noting that the variance in size, programs, and student status and type could lead to “apples to oranges” comparisons.

<sup>29</sup> RCW 43.41.400 states, “The education data center shall...In consultation with the legislative evaluation and accountability program committee and the agencies and organizations participating in the education data center, identify the critical research and policy questions that are intended to be addressed by the education data center and the data needed to address the questions.”

<sup>30</sup> Cross-sector here refers to both education data and non-education data, as distinguished from “cross-sector” as workgroup members used it at times (referring to multiple levels of education, i.e. early learning vs. K-12 vs. higher ed).

- **Washington does not have a single cabinet-level higher education agency<sup>31</sup> managing student financial aid programs and data collection, research, and analysis.** Most agencies listed in the proviso maintain multiple dashboards for various target audiences. Some workgroup members indicated this confusion could be avoided if the governor were to issue an executive order requiring agencies to consolidate their dashboards. The workgroup discussed the benefits and challenges of consolidating existing dashboards into a centralized system modeled after [Minnesota's Office of Higher Education website](#). However, Minnesota's agency is at the cabinet level and is responsible for "providing students with financial aid programs and information..." as well as "serv[ing] as the state's clearinghouse for data, research and analysis.
- **Data access and decision-making authority.** The ERDC-administered Data Request Committee reviews individual research questions to approve or deny student-level data requests. Such determinations involve judgement calls as Committee members compare new research questions to the list of previously-approved questions. Sometimes gray areas arise. This can present difficulties, for example, when research questions deemed worthy of exploring and funding by a Foundation do not fit.
- **Critical research and policy questions.** The workgroup noted that critical research questions present an avenue to increase access to data, since data requests tied to a critical research question would not necessarily need to go through the Data Request Committee; however, data requests from a third party (not explicitly authorized in data-sharing agreements) would still need to go through that Committee). While the workgroup noted that these questions would need regular updates, a complete reading of RCW [43.41.400\(2\)\(a\)](#) describing "critical research and policy questions" reveals provisions for periodic/routine updates—see (2)(d), (2)(e), and (2)(j). ERDC and partners on the Data Governance Workgroup should prioritize regular (biennial) updates of these questions.

In the future, to avoid unnecessarily limiting the scope of education-related research (by restricting data sharing to prescribed research questions), the ERDC plans to assess whether each data request ties to one of a list of critical questions the ERDC is creating. These critical questions would go into data-sharing agreements. This would allow the agency to process requests faster (ERDC and its data providers have data-sharing agreements that authorize the ERDC to redisclose data when an audit/evaluation addresses a specified critical research question). However, some questions are likely to fall into a gray area, in which case ERDC would still need confirmation from data providers. Tensions (as noted in [Appendix H](#)) also emerged around having data providers decide whether their data should be released in response to specific data requests (as ERDC states that the Attorney General's Office has recommended). Workgroup members agreed on the importance of protecting privacy and complying with FERPA.

The workgroup explored the idea that relevant agencies and institutions in Washington State could develop, in collaboration with students, parents and other key parties, a shared research agenda to help standardize and expedite the research redisclosure process for most common research questions.

- **What students are included in individual-level data?** Some higher education students in Washington State are not eligible for or do not receive state student-aid funding. As a result, some individual-level data for these students may not be collected or available. This creates problems for research and evaluation studies, which in many cases needs to consider all students.
- **When does FERPA apply?** FERPA regulations apply to all education records (including when linked to non-education data) unless data is fully de-identified. Disclosure to ERDC (as a FERPA-permitted entity, authorized representative) is permissible under the *audit or evaluation* exception. However, redisclosure without consent by ERDC to external researchers etc., is only allowable when the research project complies with FERPA (aligns with the audit or evaluation exception or is approved as a "legitimate interest" by data contributors under the

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<sup>31</sup> WSAC is a nine-member council supported by a cabinet-level state agency.

studies exception). PTAC can provide FERPA-related information; however, ERDC and other state education agencies and institutions rely on their AAGs for advice on the application and implementation of FERPA.

- Regarding “Fiscal Questions,” a workgroup member stated that  
“given the nature and diversity of member campuses, providing ‘institutional expenditures, by fund and appropriation type, at the program and/or department level’ is not doable, given a high number of interdisciplinary programs, and shared resources across departments/programs. Similarly, we cannot provide ‘institutional expenditures, by fund and appropriation type for undergraduate, graduate, resident, non-resident, domestic, and foreign students respectively.’ We do not provide resources differently for our students based on residency or international status. Other fiscal questions are mostly answerable as long as the data can be provided in summary form as it is provided to IPEDS, American Association of University Professors, the Common Data Set (CDS), etc.”
- Some ideas put forth in assessment interviews (and/or report review by email) did not arise in workgroup conversations, but may merit mentioning in this report for completeness, including:
  - Washington should assess the feasibility, costs, benefits, and potential drawbacks of adopting a universal student ID to avoid having to use social security numbers or other personally-identifiable information in data disclosure and redisclosure.
  - Consider establishing universal data governance standards or other guidance for sharing across all state agencies.
  - While ERDC currently accepts data in any format, ERDC could develop a more efficient structure for data transmission in the future to mitigate the workload involved with cleaning and translating data.
  - Can ERDC’s warehouse be expanded to include all higher education sectors, reporting on a quarterly rather than annual basis?

## Next Steps

The workgroup identified several areas to improve the system, listed in the recommendations above. Participants noted the importance of establishing a mechanism to report on progress made and steps taken to implement the recommendations and other identified improvements. This reporting might be to each other, to Legislative members and staff, or to interested and affected parties.

With the limited time frame and the complexity of the system and its myriad sensitivities and issues, the group identified numerous opportunities for potential improvement toward the policy goals that would benefit from additional dialogue among a similar set of parties.<sup>32</sup> These include:

- ERDC could work with data providers, data requesters, and legal experts from AAGs and PTAC to identify and address specific opportunities to improve the data provision process to reduce the time it takes to respond to and fulfill external data requests. ERDC could, as part of that process, identify current timelines for fulfilling requests and efficiencies it could achieve under different funding scenarios.
- More dialog among a set of parties similar to the workgroup, potentially with Legislative members or staff, can identify costs and implementation details of incorporating additional key metrics to ERDC’s PCHEES dashboard. More dialog is needed to ascertain feasibility and utility of a single statewide postsecondary data dashboard.

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<sup>32</sup> The Center’s project team asked at the last meeting if workgroup members wanted to continue the conversation in 2020. Multiple participants indicated they found the meetings valuable and had interest in keeping the dialog going (whether with assistance from the Center or not).

- A set of parties similar to the workgroup could “map” the reporting landscape before determining whether any reporting requirements can be automated or streamlined and gauging the utility of a centralized repository for key educational data metrics.
- Incorporate selected information from [Fiscal.wa.gov](https://fiscal.wa.gov) data into selected dashboard(s) to improve financial transparency. More dialog could determine which dashboards and which data to include.
- Further discussion is needed to better facilitate cross-sector (using both education and non-education data) research, while ensuring data privacy and security under FERPA.
- More dialog is needed to ascertain feasibility and utility of a single statewide postsecondary data dashboard. Recommendation a)-1 identifies an opportunity to combine some key data from across Washington’s higher education sector, though future dialogue is needed to gauge efficacy and cost. That conversation should involve a similar set of interested and affected parties and first identify what exists now (and where), whether the way data is collected and stored can align across multiple agencies, before considering what it would take to consolidate this data into a common spot and whether it would be beneficial enough to make it worth the investment and maintenance.<sup>33</sup>
- Regarding duplicative reporting requirements: more discussion is needed to fully understand the redundancies that exist and how the system might be simplified.
- Consider ways to provide Legislative, agency, and researcher education on student data privacy laws and best practices. Some resources are available via PTAC, however more dialog is needed to determine specifics.
- Consider establishing mechanisms that clarify who is making specific decisions on individual data requests and the basis of those decisions. For example, in the case where a question is deemed to be not-FERPA compliant it should be clear who made the decision about FERPA as it relates to the specific research/data request.
- Given challenges experienced by the Legislature and external researchers, the workgroup discussed recommending the Legislature provide ERDC resources to conduct research in service of state education goals, but some members expressed reservations. The group would need further dialog to understand how to enable future ERDC research, while simultaneously pursuing efficiency improvements to the data request approval process.

Workgroup participants indicated that they intend to work independently to assess which recommendations can move forward without Legislative involvement and which can get advanced by individual entities, not specifically addressing (for now) those requiring additional workgroup deliberations by a similar set of parties.

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<sup>33</sup> A workgroup participant commented that this and the prior bullet “cover ERDC improvements in response time to data requests and developing a single statewide dashboard. Our concern is these recommendations overlook existing dashboards, such as the high school graduate outcomes, which would benefit from expansion and more timely updates, particularly while the other improvements are developed.”

# Appendices

## **Appendix A: Fiscal Year 2020 Supplemental Budget Sec 607. Washington State University**

\$85,000 of the general fund—state appropriation for fiscal year 2020 is provided solely for the William D. Ruckelshaus Center to coordinate a workgroup and process to develop options and recommendations to improve consistency, simplicity, transparency, and accountability in higher education data systems. The workgroup and process must be collaborative and include representatives from relevant agencies and stakeholders, including but not limited to: Washington Student Achievement Council, Workforce Training and Education Coordinating Board, Employment Security Department, State Board for Community and Technical Colleges, the four-year institutions of higher education, Education Data Center, Office of the Superintendent of Public Instruction, Washington State Institute for Public Policy, Joint Legislative Audit and Review Committee, and at least one representative from a nongovernmental organization which uses longitudinal data for research and decision making. The William D. Ruckelshaus Center must facilitate meetings and discussions with stakeholders and provide a report to the appropriate committees of the legislature by December 1, 2019. The process must analyze and make recommendations on:

- (a) Opportunities to increase postsecondary transparency and accountability across all institutions of higher education that receive state financial aid dollars while minimizing duplication of existing data reporting requirements;
- (b) Opportunities to link labor market data with postsecondary data including degree production and postsecondary opportunities to help prospective postsecondary students navigate potential career and degree pathways;
- (c) Opportunities to leverage existing data collection efforts across agencies and postsecondary sectors to minimize duplication, centralize data reporting, and create administrative efficiencies;
- (d) Opportunities to develop a single, easy to navigate, postsecondary data system and dashboard to meet multiple state goals including transparency in postsecondary outcomes, clear linkages between data on postsecondary degrees and programs and labor market data, and linkages with P-20 data where appropriate. This includes a review of the efficacy, purpose, and cost of potential options for service and management of a statewide postsecondary dashboard; and
- (e) Opportunities to increase state agency, legislative, and external researcher access to P-20 data systems in service to state educational goals.

**Appendix B: Workgroup Meeting Attendees**  
*alpha order by organizational affiliation*

Dan Goldhaber	Center for Education Data and Research, University of Washington
Andreas Bohman	Central Washington University
Paul Francis	Council of Presidents
Kevin Ritzer	Department of Licensing
Hector Rodriguez	Department of Licensing
Roy Caligan	Eastern Washington University
Tim Norris	Education Data Center
Jim Schmidt	Education Data Center
Jeffrey Thayne	Education Data Center
Jeff Robinson	Employment Security Department
Maddie Veria-Bogacz	Employment Security Department
Megan Mulvihill	House College and Workforce Development Committee
Trudes Tango	House Labor and Workforce Standards Committee
Etienne Rios	Independent Colleges of Washington
Terri Standish-Kuon	Independent Colleges of Washington
Keenan Konopaski	Joint Legislative Audit and Review Committee
Ryan McCord	Joint Legislative Audit and Review Committee
Casey Radostitz	Joint Legislative Audit and Review Committee
Susan Howson	Legislative Evaluation and Accountability Program
Michael Mann	Legislative Evaluation and Accountability Program
Amy Brackenbury	Northwest Career Colleges Federation
Zachary Speron	Northwest Career Colleges Federation
Jean Wilkinson	Office of the Attorney General
Will Saunders	Office of the Chief Information Officer
Breann Boggs	Office of Financial Management, Budget Office
Megan Mulvihill	Office of Program Research, Washington State Legislature
Deb Came	Office of Superintendent of Public Instruction
Katie Weaver-Randall	Office of Superintendent of Public Instruction
Simrun Chhabra	Office of Rep. Debra Entenman, College and Workforce Development Committee
Sarah Myers	Office of Sen. Emily Randall, Higher Ed and Workforce Development
Sean Cottrell	Privacy Technical Assistance Center
Eric Gray	Privacy Technical Assistance Center
Ross Lemke	Privacy Technical Assistance Center
Bob Duniway	Seattle University
Steven Ellis	Senate Democratic Caucus
Alicia Kinne-Clawson	Senate higher Education and Workforce Development Committee
Michele Alishahi	Senate Ways and Means Committee staff
Michael Pastore	University of Puget Sound
Erin Guthrie	University of Washington
Ann Nagel	University of Washington
William Zumeta	University of Washington Evans School of Public Policy and Governance
Simone Boe	Washington Education Association

*Workgroup Report on Consistency, Simplicity, Transparency, & Accountability in Education Data in Washington State*

Darby Kaikkonen	Washington State Board for Community and Technical Colleges
Danielle Fumia	Washington State Institute for Public Policy
Stephanie Lee	Washington State Institute for Public Policy
Sherry Gordon	Washington State University
Jenée Myers Twitchell	Washington STEM
Mikel Poppe	Washington STEM
Isaac Kwakye	Washington Student Achievement Council
Marc Webster	Washington Student Achievement Council
Randy Smith	Workforce Training and Education Coordinating Board
Dave Wallace	Workforce Training and Education Coordinating Board

## Appendix C: Workgroup Meeting Summaries

### Workgroup Meeting 1 Notes: *Consistency, Simplicity, Transparency, and Accountability in Ed Data Systems*

Tuesday, September 10th, 2019 | 9:30 a.m. – 12:30 p.m. | WSU Energy Program Library, Olympia

#### **Attendees (in person, alpha order by organizational affiliation):**

Dan Goldhaber	Center for Education Data and Research, University of Washington
Paul Francis	Council of Presidents
Tim Norris	Education Data Center, Office of Financial Management (OFM)
Jim Schmidt	Education Data Center (ERDC), OFM
Jeff Robinson	Employment Security Department
Keenan Konopaski	Joint Legislative Audit and Review Committee
Casey Radostitz	Joint Legislative Audit and Review Committee
Michael Mann	Legislative Evaluation and Accountability Program
Amy Brackenbury	Northwest Career Colleges Federation
Breann Boggs	OFM, Budget Office
Megan Mulvihill	Office of Program Research, Washington State Legislature
Deb Came	Office of Superintendent of Public Instruction
Steven Ellis	Senate Democratic Caucus
Darby Kaikkonen	Washington State Board for Community and Technical Colleges
Danielle Fumia	Washington State Institute for Public Policy
Stephanie Lee	Washington State Institute for Public Policy
Mikel Poppe	Washington STEM
Isaac Kwakye	Washington Student Achievement Council (WSAC)

#### **Attendees (via Zoom):**

Andreas Bohman	Central Washington University
Terri Standish-Kuon	Independent Colleges of Washington (ICWs)
Simrun Chhabra	Office of Rep. Debra Entenman, College and Workforce Development Committee
Sarah Myers	Office of Sen. Emily Randall, Higher Ed and Workforce Development
Bob Duniway	Seattle University
Erin Guthrie	The University of Washington
Ann Nagel	The University of Washington
Jenée Myers Twitchell	Washington STEM
Randy Smith	Workforce Training and Education Coordinating Board

#### **Facilitation Team:**

Chris Page	Ruckelshaus Center
Phyllis Shulman	Ruckelshaus Center
Hannah Kennedy	Ruckelshaus Center

#### **Meeting Goals:**

- Review group norms and process;
- Identify shared values;
- Dialogue on what this group can achieve; and
- Determine what information and resources would help inform solutions.



## Introduction and Agenda Review:

- The first meeting is about figuring out how to work together, identifying common interests, and discussing the workgroup's path forward.
- The proviso states that a report will be submitted to the Legislature by December 1<sup>st</sup>, 2019, though December 31<sup>st</sup> may be acceptable if more time would enable the group to make progress. The Ruckelshaus Center (the Center) will prepare the report, with recommendations developed by this workgroup. The proviso does not require consensus, but ideally all parties can agree on the recommendations.

## Proviso Sec 607. Washington State University, Background:

*Steven Ellis, Senate Democratic Caucus*

- The Senate sees this as an important project and is thankful for everyone's participation.
- This proviso started when former state senator Guy Palumbo asked whether Washington's postsecondary degree production is aligned with workforce needs in high-demand industries. Two barriers emerged to answering this question:
  1. Insufficient data: incomplete and/or disjointed data; and
  2. Unclear data management roles; the Leg. found it unclear who is required to disclose what data, and where/with whom this data can be shared. Leg. also found it unclear why some agencies were tasked with data management vs. others.
- Palumbo developed Senate Bill 5960 to address apparent disaggregation of data by creating a data warehouse and dashboard. Several folks in this workgroup provided feedback and the fiscal note came back very high; instead this proviso was inserted in the budget.
- Main takeaways: what can be done to ensure the maximum amount of data is publicly available in a central location, while minimizing data collection burdens for institutions and agencies? NOTE: This proviso focuses more on student-level data vs. strictly financial.

## Proviso Sec 607. Discussion

- The data warehouse already exists; the problem is more accessibility. Suggested starting point- workgroup to inventory what data is currently collected/housed by ERDC.

## Workgroup Overview and Process:

- Facilitation team suggests informal (thumbs up, nod of heads) decision making/consensus-building model, though it may help to develop a more formal process as meetings progress.
- The workgroup reviewed and approved a short set of ground rules. *Amendment: to accommodate folks joining remotely, workgroup members shall introduce themselves before speaking.*
- Meeting schedule: Five meetings from September to November; possibly a 6<sup>th</sup> meeting in December.
- Suggestion: this workgroup should take into consideration the [newly approved Northwest Commission on Colleges and Universities Eligibility requirements and standards](#), which take effect on January 1, 2020.

## Brainstorm: What does an Ideal Ed Data Landscape Look Like?

- Policymakers and the public able to see the entire higher ed system, particularly enrollment data, in one place (e.g., public 4-years, ICWs, CTCs, private for- and not-for-profits, etc.)
  - Integrated Postsecondary Education Data System (IPEDS) may capture some of this, but data is often too delayed to be useful.
  - ERDC covers much of this. Can ERDC's warehouse be expanded to include all higher ed sectors?
- Complete map of the data landscape, including sources, so folks can understand what data exists, where to access it, and how to use it.
- Complete and accessible data dictionary, so folks know what is available (where and in what format).

- Buy-in from all data providers to develop clear and common data definitions.
- Clear, expedited process to fulfill data requests that serve state education goals.
- Ability to track students in public systems over time, from early learning through workforce (i.e., P-20W).
- Link education data across agency systems (e.g., Department of Social and Health Services or DSHS, health agencies, Department of Corrections, etc.) to capture a holistic view of students and to inform policies aimed at closing the opportunity gap.
- Improve nimbleness/responsiveness and accessibility of current P-20W data system. WA is a national leader in data warehouse systems, the issue is access.
- Eliminate duplicate reporting: align data reporting requirements so institutions send data to only one place (where it can then be linked).
- Institutions asked to provide data in a way that makes sense: i.e. reporting it once (vs. many ad hoc requests), to the place where it does the most good (a la what institutions did under the former Higher Education Coordinating (HEC) Board).
- Connect outcomes to financial data (e.g., tuition waivers). Currently, this information is requested ad hoc from institutions and these requests can be burdensome to respond to.
- Clear distinction between operations data and longitudinal/outcome data.
- Determine needed level of data aggregation/granularity, in what format: some information is best displayed in dashboard format, while research drawing causal links may need access to student-level records.
- High-quality data across the entire higher ed system.
- Clear guidelines for privacy and appropriate uses of data.

### **Situation Assessment Key Findings**

Chris Page presents key findings from situation assessment interviews.

- Most folks agree WA has a lot of high-quality data and a robust P-20 longitudinal data warehouse system; however, access is seen as an issue.
- There is a lack of clarity around the current ed data landscape. Several respondents highlighted the value of creating a data inventory or map.
- Multiple respondents highlighted the potential to evolve the system towards cloud-based storage or other cutting-edge IT solutions with integration across state agencies to support cross-sector policy analysis.

### **Brainstorm: What is Working Well?**

- Basic data infrastructure in WA is much better than most states. WA is also a leader in integrating data across multiple agencies (e.g., education, labor market, and DOC).
- WA has a good track record of protecting privacy. Folks in this workgroup respect and recognize the importance of data privacy protection.
- The publicly-available dashboards are good (though could be more consolidated).
- ERDC has gotten the public four-year institutions on the same page about data definitions and metadata management.
- WA is working to improve consistency across sectors. For example, WSAC was recognized for their work to include apprenticeship data.
- ERDC established and maintains strong communication with higher ed administrations. ERDC's research coordinating committee meetings are valuable to ensure data providers and collectors are on the same page about institutional program changes and how this impacts the data.
- Agencies can fulfill requests with adequate time to do so.

- WA has strong culture of cross-agency collaboration. Current leadership and staff across agencies recognize the need to work together and operate with good faith. This foundation for collaboration is mostly informal, based on personal relationships (vs formal and documented with MOAs).

### **Brainstorm: What Can We Improve or Change for the Better?**

- Datasets can be *too* clean and packaged, without clarity on decisions that went into producing the high-level reports. Researchers may have need for more granularity (can be tension between what data format is useful for dashboards vs. research).
- Desire for a clearly articulated and standardized process for obtaining data.
- Improve consistency by clarifying what metrics are being used and what categories exist or don't exist. Establish clear, complete data definitions (currently, students that pursue postsecondary credentials/degrees out of state are not included, self-employment and other occupations are not included in labor market data, etc.).
- Expedite access to data, possibly via improved technology.
- Improve cross-sector policy analysis by linking ed data with other state agency systems.
- Clarify what questions can be asked of current data sets and under FERPA.

### **Possible Solutions:**

- Invest in new/improved technology.
- Greatly increase ERDC resources.
- Create a single "funnel" agency to streamline data requests. Researchers and Legislative staff would submit questions/data requests to agency, which in turn would filter requests down to institutions.
- Clear and standardized (if possible) understanding of FERPA and other privacy concerns.
  - May also need to consider what *should and shouldn't* be done when discussing data privacy.
  - Caveat: different laws/privacy regimes apply to different institutions (explains why one institution will release data that another institution would not).
  - Need to be nimble/responsive to emerging privacy concerns and requirements; both the legal landscape and public perceptions around privacy are changing.
  - Workgroup should try to find solutions with respect to privacy concerns. This may require finding new ways of doing things, but doesn't have to mean it can no longer be done.

### **Where are Conflicting Incentives (Where is there Tension)?**

- Privacy: different agencies operate under different privacy regimes, which can impact the accessibility of data they collect.
- Questions and/or concerns of accountability around data usage.
- Disagreement about what metrics to use. For example, how institutions count the number of students enrolled has implications for staff job security etc.

### **What does Success Look Like for this Workgroup?**

Facilitators suggest for this project's short timeline, it would be achievable that the workgroup create a clear inventory of current ed data systems with gaps and barriers, opportunities and clear paths for improvement, and commitment from workgroup members to keep working together (on improvements). Workgroup members generally agreed, while suggesting it might help to develop and articulate a set of shared values focused on the good of the system overall. Sample values might include:

- Commitment to fairness and equity across institutions.
- If data cannot be used (e.g., due to FERPA), then it should not be collected.

**Possible Topics for Future Meetings:**

- Discuss shared values and develop a list focused on the good of the system overall.
- Map of existing data landscape; identify where there is duplication, gaps, and constraints.
- FERPA and privacy briefing (by Attorney General's Office and Ann Nagel). Discuss possible cross sector standards for data sharing.
- Five minute "show and tell" from each institution/agency: what data they collect and provide, for what purposes, and if/when the data are shared.
- Develop list of common questions, particularly those that cannot be answered or are difficult to answer under the current system.
- Inventory data definitions and dictionaries.

**Next meeting:** *Wednesday, Sept. 25, 2019, 9:30 am – 12:30 pm, WSU Energy Program Library (Olympia, WA)*

**Workgroup Meeting 2 Notes: Consistency, Simplicity, Transparency, and Accountability in Ed Data Systems**

Wednesday, September 25th, 2019 | 9:30 a.m. – 12:30 p.m. | WSU Energy Program Library, Olympia

**Attendees (in person, alpha order by organizational affiliation):**

Paul Francis	Council of Presidents
Jim Schmidt	Education Data Center (ERDC), OFM
Tim Norris	Education Data Center, Office of Financial Management (OFM)
Jeff Robinson	Employment Security Department
Maddie Veria-Bogacz	Employment Security Department (ESD)
Casey Radostitz	Joint Legislative Audit and Review Committee
Ryan McCord	Joint Legislative Audit and Review Committee (JLARC)
Michael Mann	Legislative Evaluation and Accountability Program
Susan Howson	Legislative Evaluation and Accountability Program (LEAP)
Maryann Brathwaite	Northwest Career Colleges Federation
Deb Came	Office of Superintendent of Public Instruction (OSPI)
Jean Wilkinson	Office of the Attorney General
Breann Boggs	OFM, Budget Office
Michele Alishahi	Senate Ways and Means Committee
Darby Kaikkonen	Washington State Board for Community and Technical Colleges
Dani Fumia	Washington State Institute for Public Policy
Mikel Poppe	Washington STEM
Dave Wallace	Workforce Training and Education Board

**Attendees (via Zoom):**

Roy Caligan	Eastern Washington University
Jeffrey Thayne	Education Research and Data Center
Trudes Tango	House Labor and Workforce Standards Committee
Etienne Rios	Independent Colleges of Washington
Zachary Speron	Northwest Career Colleges Federation
Sarah Myers	Office of Sen. Emily Randall, Higher Ed and Workforce Development
Bob Duniway	Seattle University
Alicia Kinne-Clawson	Senate Higher Education and Workforce Development Committee
Erin Guthrie	University of Washington (UW)
William Zumeta	UW Evans School of Public Policy and Governance
Simone Boe	Washington Education Association
Marc Webster	Washington Student Achievement Council

**Meeting Goals:**

- Identify shared values to guide policy recommendation process;
- Map existing data landscape (identify opportunities if possible); and
- *IF TIME*: Catalog key research questions (or types of questions) needing to be answered.

**Introduction and Agenda Review:**

- Brief review of workgroup ground rules and meeting purpose and objectives.
- Workgroup encouraged to put the good of Washington state students and public first.

## Shared Values

Continuation of values discussion from first workgroup meeting, with specific focus on shared values that can guide policy recommendations.

### Brainstorm:

- Good data drives good policy and instills confidence in public institutions from policy makers and public.
- Data for knowledge development to improve student/institution performance, outcomes, and policy.
- Ensure open data sources to the extent possible while protecting individuals' right to privacy.
- Acknowledge and understand differences: among agencies/institutions and the various leadership/ authorities they are subject to; and agree to work towards common high-level metrics (e.g., completion rates, enrollment etc.).
- Increase opportunities for employers, job seekers, and communities in Washington state.
- Match education program "supply" with workforce/jobs of the future "demand."
- Collect data and conduct research with student-centered and equity lenses:
  - Student-centered: need transparency of student and institutional performance data even if outcomes are "negative." (Accountability and data transparency are good for the state and the public, even if sometimes suboptimal for institutions or agencies.)
  - Equity lens: acknowledge the vital role of data in understanding differences among populations and improving and ensuring equal opportunities in the state education system.
- Data opens the door and informs conversations, but is not the be-all, end-all.
- There is a need to reorient/re-educate to view the sharing of data in more positive light.
- Strive to balance outcomes and institutional accountability.
- Public postsecondary institutions play a vital role in our state as public servants.
- *Value the forest, not the tree.* For this workgroup: a recommendation should be supported by all if it benefits the state of Washington, even if not benefitting an individual institution or agency directly.

## Mapping the Landscape: to gauge opportunities for improvement

Tim Norris (ERDC Senior Forecast Analyst) presented an overview of ERDC and its current and planned data flows.

### Notes:

- ERDC processes data from multiple sources in a variety of formats.
- ERDC focuses on connections within P-20 system; cross-sector linkages (e.g., K-12 to DSHS) are currently fulfilled ad hoc.
- Separate data governance agreements with each data partnership. ERDC (like other agencies in this workgroup) has data-sharing agreements with multiple data providers that stipulate what data ERDC can share and for what purposes. Tim noted that these agreements require building trust.
- ERDC has developed, and will continue to develop, different *data marts* to make aggregate data sets available for research and limit the need to fulfill ad hoc data requests. These are driven by a variety of research requests:
  - Some come from specific legislations;
  - Some driven by specific agency (e.g., Department of Children Youth and Families driving Kindergarten data mart) or organization (the Bill and Melinda Gates Foundation have provided resources to build data marts),
  - Others (e.g., High School Grads data mart) emerged organically based on common questions being asked.
- The smaller the cell size, the less accurate the data—so ERDC may be less likely to publish it.
- ERDC expressed reluctance to share full suite of data dictionaries because it includes lots of data ERDC receives but may not share or publish.

### *Questions and Discussion*

- Suggestion: after linking/matching, ERDC provide a “receipt” to data providers confirming what data they received, how they validated it, and how it will be used. General agreement: this is doable and could help data providers better answer questions they receive about published data or reports.
- Do standardized principles guide the development of individual data governance agreements?
  - To share protected data, it must be both (a) necessary to answer critical research question/s (as defined by Legislature, data providers, and research community); and (b) securely protected on both sides (ERDC’s and the data user’s).
- Suggestion: the workgroup could create an inventory of data sharing constraints, by agency.
- Potential recommendation: to ensure data accuracy, allow data providers to double-check accuracy before data gets shared. A data “receipt,” as mentioned above, could streamline this.
- Institutions may be reluctant to share data they are not legally required to, unless the data is indemnified and burden of risk of disclosure is removed from the institution.
- ERDC, like many data practitioners is not adequately resourced for the many jobs they perform. Workgroup could consider recommending increased funding and resources for ERDC.
- Washington has a P-20 warehouse; nonetheless analysts and policy makers still cannot answer some common questions (e.g., total postsecondary enrollment statewide). Potential recommendation: create a “postsecondary” dashboard designed to answer commonly asked Legislature questions (could be similar to PCHEES dashboard but with financial aid data). It would require addressing agreeing on common ones (e.g., are dual enrollment students counted once or twice?).

### *Gaps:*

- Currently cannot track out-of-state earnings.
- Federal employment data is not included, so landscape does not reflect military workforce. This is particularly important in Washington.
- Alaska collects occupation-level data now; Washington would benefit from these data (e.g., Workforce Board would like to know when someone gets a job if it is related to training). Possible recommendation: ESD require occupation-level data reporting from employers.
- Self-employment is not reflected. Access to contract work (1099s) records would require data-sharing agreement with IRS. May be possible to access some records via state business licenses.
- Inconsistent geographic linkages in workforce data (e.g., it is not always possible to know if individual holds a specific job in Seattle or Spokane).
- Private and out-of-state postsecondary data exists but is prohibitively time consuming and expensive to access from National Student Clearinghouse (NSC). HB2158 tries to address this by tying state financial aid dollars to student-level data; however, the use of such data is limited to Legislative interests and financial aid specific research. To address the completeness of accessible postsecondary data may require broadening or amending HB2158 stipulation. Could this be a possible recommendation?
- Completing the data landscape is not that hard but *is* complicated:
  - It would require countless data-sharing agreements among various agencies that collect and house various data; each agency is governed by local, state, and/or federal laws/statutes.
  - Legislatures, institutions, and agencies would need to see the clear value of connecting data across the landscape.
  - It would take time and trust.
  - There may be a way to do this, but not with a universal data sharing agreement.

- Using and accessing data in this landscape is like an Easter egg hunt. It is confusing for analysts and legislative staff to figure out what sources to go to for what data and what data can be compared like apples-to-apples.
- Possible recommendation: create a P-20 data map and/or practitioner's handbook, including an acknowledgement of the gaps and/or limitations.

*Suggested Future Meeting Topics:*

- Presentation on FERPA and data privacy by AAG, Jean Wilkinson, with comments by agencies on any additional data sharing constraints and informed by ERDC data-sharing principles.
- Duplication discussion; identify what institutions are being asked to report multiple times and brainstorm possible solutions. Ruckelshaus Center staff to follow-up with Council of Presidents, State Board for Community and Technical Colleges, Northwest Career Colleges Federation, and Independent Colleges of Washington about duplications before next meeting.
- Inventory of existing dashboards; identify gaps and what could possibly be enhanced. Ruckelshaus Center team to ask agencies for dashboards and distill.
- Discussion on commonly-asked questions, particularly by Legislature, possibly led by LEAP staff. Complement this with dialogue on other questions that are not getting answered, troubleshoot ways to provide the information needed to answer them.

***Next meeting:*** Friday, October 18th, 2019, 9:30 am – 12:30 pm, WSU Energy Program Library (Olympia)



**Workgroup Meeting 3 Notes: Consistency, Simplicity, Transparency, and Accountability in Ed Data Systems**

Friday, October 18th, 2019 | 9:30 a.m. – 12:30 p.m. | WSU Energy Program Library, Olympia

**Attendees (in person, alpha order by organizational affiliation):**

Paul Francis	Council of Presidents
Dan Goldhaber	Center for Education Data and Research (UW)
Kevin Ritzer, Hector Rodriguez	Department of Licensing
Tim Norris, Jim Schmidt	Education Data Center (ERDC), OFM
Megan Mulvihill	House College and Workforce Development Committee
Terri Standish-Kuon	Independent Colleges of Washington
Casey Radostitz, Valerie Whitener	Joint Legislative Audit and Review Committee (JLARC)
Susan Howson, Michael Mann	Legislative Evaluation and Accountability Program (LEAP)
Maryann Brathwaite	Northwest Career Colleges Federation
Will Saunders	Office of the Chief Information Officer (OCIO)
Katie Weaver-Randall	Office of Superintendent of Public Instruction (OSPI)
Jean Wilkinson	Office of the Attorney General
Michele Alishahi	Senate Ways and Means Committee
Darby Kaikkonen	Washington State Board for Community and Technical Colleges
Dani Fumia	Washington State Institute for Public Policy
Dave Wallace	Workforce Training and Education Board (Workforce Board)

**Attendees (via Zoom):**

Roy Caligan	Eastern Washington University
Jeff Robinson, Maddie Veria-Bogacz	Employment Security Department (ESD)
Etienne Rios	Independent Colleges of Washington
Ryan McCord	JLARC
Zachary Speron	Northwest Career Colleges Federation
Breann Boggs	OFM, Budget Office
Ross Lemke	Privacy Technical Assistance Center (PTAC)
Sean Cottrell	PTAC
Bob Duniway	Seattle University
Michael Pastore	University of Puget Sound
Ann Nagel	University of Washington (UW)
William Zumeta	UW Evans School of Public Policy and Governance
Simone Boe	Washington Education Association
Sherry Gordon	Washington State University
Marc Webster	Washington Student Achievement Council (WSAC)

**Meeting Goals:**

- Identify relevant data privacy laws, statutes, and data-sharing constraints; agree to shared parameters if possible;
- Review emerging recommendations; identify where further research or discussion is needed; and
- Inventory existing dashboards.

**Introduction and Agenda Review:**

The facilitators briefly reviewed workgroup ground rules and the meeting purpose and objectives, then acknowledged the sensitivities inherent in discussions on data-sharing, privacy, accountability measures, and other complex topics among public servants with longstanding working relationships.

### Review and Discuss Dashboard Inventory:

Draft dashboard inventory developed by Ruckelshaus Center Team in response to workgroup member feedback. State Board of Community and Technical Colleges (SBCTC) has two sets of dashboards:

- Publicly-available dashboards displaying credentials awarded, enrollment, and similar data.
- College Access Only dashboards displaying cohort-level data, with more emphasis on education and program outcomes.
  - Community and Technical College (CTC) outcomes are particularly difficult to measure, given the wide range of student goals. For example, some students attend programs with a desire to transfer to a 4-year institution, while other students take a few CTC classes to upscale career or job opportunities.
  - Researchers may file a request for access to College- Only data with SBCTC. If requested data is aggregated, it may be shared, but access to the actual website is restricted to institutions.
- ERDC has multiple dashboards to address *gaps* in the state education system; most dashboards were created through the budget proviso process or in response to customer feedback.<sup>34</sup>
- The Workforce Board developed and maintains three relevant dashboards:
  - *CareerBridge*, displaying information for individuals looking to get retrained for career purposes. CareerBridge compares outcomes, costs, and degrees offered across a variety of programs.
  - *Skills Gap Analysis*, compiled and maintained in partnership with WSAC, displays information related to Washington's workforce supply and demand gaps.
  - *Workforce Training Results by Program* tracks the results and the taxpayer return on investment for 12 of the state's largest workforce programs; these programs account for more than 98 percent of the federal and state funds spent on Washington's workforce development system.
- WSAC's *Roadmap* dashboard displays Washington's population-level education attainment goals and progress. Metrics include: high school graduation rates, enrollment, completion, affordability, financial aid, and state funding, displayed at demographic and aggregate levels. The Roadmap dashboard is meant to offer a summary of Washington's higher education system using WSAC financial aid data and data from IPEDS, LEAP, and Legislative budgets.
- ESD's *WorkSource* dashboard reports on job seekers ESD has served, monthly labor force statistics, and current and historical trends in employments and unemployment.

### Brainstorm:

- Suggestion: include Fiscal.wa.gov in dashboard inventory as most complete source for higher education fiscal data.
- Suggestion: consolidate some Washington state education data dashboards and model after [Minnesota example](#).
- Legislature's desire for a single system-wide dashboard may not be feasible:
  - It would take a tremendous amount of time, funds, and work to consolidate or improve existing dashboards.
  - Washington's ed system is very decentralized.
  - Different dashboards and systems use different data definitions (i.e., FTE is defined differently by SBCTC vs. IPEDS).
- Suggestion to simplify enrollment (and possibly credentials) dashboards: combine public 4-year and SBCTC dashboards.
  - Private not-for-profit 4-year institutions currently report enrollment data under IPEDS system.
  - May require common data definitions, i.e. resolving differences between IPEDS and WA institutions or agency-specific data definitions.
  - To fulfill Legislature requests, nonpartisan staff uses IPEDS to gather education data. IPEDS is not perfect (data lags by a year or more), but IPEDS allows for the most consistent comparison across institutions.
- Suggestion: ERDC could produce education system wide enrollment dashboard using IPEDS data.

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<sup>34</sup> ERDC is housed under OFM and the Public Centralized Higher Education Enrollment System (PCHEES) Public 4-year dashboard was created as a check on the number of enrollments relative to an institution's state budget allotment and therefore, uses different data definitions than the Integrated Postsecondary Education Data System.

- Possible recommendation: Consider consulting [Anthro-Tech](#) or similar entity specializing in connecting people to technology to evaluate different agencies' data systems and design an interface to coordinate across the entire education sector.
- **Q:** Could workgroup recommend the creation of a meta dashboard or handbook to guide user experience and access across all state education dashboards? **R:** ERDC has a list of data dashboards and perhaps could add information on each dashboard: e.g., where to access, how it was created, and the intended target audience. This recommendation should include a note about the challenges to keeping dashboards current.
- Legislature commonly asks about enrollment, retention, completion, financial aid, and more increasingly about student loan data, every year, multiple times a year.

### Family Education Rights and Privacy Act (FERPA) and Education Data Privacy

*FERPA Presentation: Jean Wilkinson, Senior Counsel, Washington State Attorney General's Office*

- FERPA applies to an education agency or institution that receives funding from the U.S. Department of Education (for each agency, continued funding requires compliance with FERPA). This includes almost all education institutions in Washington state, including private schools that accept financial aid.
- Students/parents have rights to education records.
- Disclosure requires written consent, barring certain exceptions.
- FERPA applies to educational records that include either:
  - Specific Personally-Identifiable Information (PII) including direct identifiers, personal identifiers (e.g., student number or SSN), and/or indirect identifiers (Date of Birth, etc.).
  - Information "that, alone or in combination is linked... to a specific student" or "would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty."
- *Local educational authorities* (school districts and institutes of higher education) disclose educational records and student data to *state educational authorities* (SEAs). These include OSPI, SBCTC, WSAC, WTECB, and Department of Children Youth and Families (DCYF) included for certain activities; social service agencies and ESD are not considered SEAs.
- State education authorities may redisclose under certain exceptions. Such redisclosure is not mandatory and requires written permission.
- European Union (EU) General Data Privacy Regulations (GDPR) include "the right to be forgotten" and the right to processing (individuals can tell institutions not to redisclose education records or related information when redisclosure is not mandatory). FERPA does not grant such rights.

#### Permissible Redisclosure:

- Data with no direct or indirect PII, known as fully de-identified data. It is challenging to fully de-identify data. Small sample sizes make it easier to identify individuals, e.g., if outcome data is published by demographics for a school with only one student who identifies as a certain race, a reasonable community member could easily identify that student. The same is true when small sample size data is reported as a percentage.
  - **Comment:** Must balance legal requirement not to share data that may be re-identified by a "reasonable" person, with researchers' need for thorough and reliable raw data.
- Data may be redisclosed to an *authorized representative* (AR) for the purposes of *auditing or evaluating an education program* or reviewing compliance with and/or enforcing federal law. State or local education authorities may designate an individual or entity as an AR for purposes of audit and evaluations.
  - ERDC is an AR, designated by statute.
  - Education Program is defined as any program *principally* engaged in education or administered by an educational agency or institution.
  - Redisclosure under the audit or evaluation exception requires written data protection agreement between state or local educational authority and AR. Agreement requirements and best practices are available on [PTAC's website](#). State agencies must also comply with [OCIO Standard 141.10](#).

- Federal Department of Education declined to provide definition of the audit or evaluation in 2013 amendments.
- *Studies* exception (more applicable at the local or school district level):
  - Applies to studies for administering student aid programs.
  - Exception allows data redisclosure only for studies with “legitimate interest” (i.e. institutions may only share data elements required to perform specific study). *NOTE:* “Legitimate interest” is not clearly defined, may allow for states to be more conservative when considering whether to share data.

#### **ERDC Data Request Process:**

- Researchers fill out a data request form, which ERDC evaluates by considering research methodology (i.e. is redisclosure necessary?) and assessing FERPA compliance (does research request fall under audit/evaluation or other FERPA exception?).
- ERDC works with individual data contributor to approve all redisclosure requests (regardless of whether they found an initial FERPA concern). Institutions look at other privacy regulations and principles, not just FERPA, when considering whether to redisclose data. While FERPA permits certain instances of redisclosure, such redisclosure is not mandatory. Institutions consider privacy principles as well as the utility of proposed research. Institutions must consider their relationships with students and alumni when deciding whether to redisclose data. Indemnification clauses and data security protocol are very important for institutions; campuses need to execute a data-sharing agreement with the state (perhaps building toward a universal agreement for all participating parties).
- Public sentiment on data privacy is changing rapidly.
- Challenge: When an agency or institution has authority to release PII data but can deny redisclosure if the education authority does not see the utility of the research question(s) and has an interest (or perceived interest) in not releasing data. This “utility clause” may cause institutions to overlook larger public policy perspective. Perception exists that education authorities deny redisclosure depending on who’s asking for the data (e.g., legislative mandate vs. independent researcher); while both address important policy issues.
- Potential solution to address this: relevant state agencies and institutions could develop, in collaboration with students, parents, researchers, and other key parties, a shared research agenda to help standardize and expedite the research redisclosure process.
- **C:** Continued confusion around process for evaluating and approving data access requests:
  - What is the standard turn-around time?
  - How is data access approval or disapproval determined?
  - Is it possible to appeal a data access decision? If so, what is the process?

#### **Data for Policy Analysis**

- When education records are linked to non-education data, FERPA protection applies, unless data is fully de-identified. For more information of data de-identifying methods, see [PTAC web resources](#).
- Researchers do not need actual names or identifiers, but some research requires raw, individual-level data.
- Under current legal framework, some group members suggest ERDC, as an authorized representative, may be best-positioned to do research. Such an arrangement is not desired by all workgroup members.
- Education data cannot be released to assess non education programs (e.g., child welfare).
- Suggestion: rephrase research questions to comply with FERPA education program requirement. For example, if interested in how children in child welfare programs perform in school, you could rephrase the question to ask “How well do schools educate children in child welfare programs?”
- When state law (i.e., legislatively-mandated research) and FERPA both apply (and may conflict), the Attorney General’s office works to comply with both on a case-by-case basis.

**Next meeting:** Friday, November 1st, 2019, 9:30 am – 12:30 pm, WSU Energy Program Library (Olympia)

**Workgroup Meeting 4 Notes: Consistency, Simplicity, Transparency, and Accountability in Ed Data Systems**

Friday, November 1st, 2019 | 9:30 a.m. – 12:30 p.m. | WSU Energy Program Library, Olympia

**Attendees (in person, alpha order by organizational affiliation):**

Kevin Ritzer	Department of Licensing
Jim Schmidt	Education Data Center, Office of Financial Management (ERDC)
Tim Norris	ERDC
Etienne Rios	Independent Colleges of Washington (ICW)
Casey Radostitz	Joint Legislative Audit and Review Committee (JLARC)
Michael Mann	Legislative Evaluation and Accountability Program (LEAP)
Maryann Brathwaite	Northwest Career Colleges Federation
Katie Weaver-Randall	Office of Superintendent of Public Instruction (OSPI)
Jean Wilkinson	Office of the Attorney General
Dan Goldhaber	University of Washington, Education Data Research Center
Darby Kaikkonen	Washington State Board for Community and Technical Colleges
Dave Wallace	Workforce Training and Education Board

**Attendees (via Zoom):**

Paul Francis	Council of Presidents
Maddie Veria-Bogacz	Employment Security Department
Megan Mulvihill	House College and Workforce Development Committee
Ryan McCord	JLARC
Breann Boggs	OFM, Budget Office
Eric Gray	Privacy Technical Assistance Center (PTAC)
Ross Lemke	PTAC
Sean Cottrell	PTAC
Alicia Kinne-Clawson	Senate Higher Education and Workforce Development Committee
Michele Alishahi	Senate Ways and Means Committee
Michael Pastore	University of Puget Sound
Ann Nagel	University of Washington (UW)
Erin Guthrie	UW
William Zumeta	UW Evans School of Public Policy and Governance
Dani Fumia	Washington State Institute for Public Policy
Sherry Gordon	Washington State University
Simone Boe	Washington Education Association
Mikel Poppe	Washington STEM
Isaac Kwakye	Washington Student Achievement Council

**Facilitation Team**

Chris Page	Ruckelshaus Center
Phyllis Shulman	Ruckelshaus Center
Hannah Kennedy	Ruckelshaus Center

**Meeting Goals:**

- Categorize data privacy issues into short- and long-term;
- Consider draft outline of workgroup's report to Legislature; and
- Review and refine emerging draft recommendation.

## **Introduction and Agenda Review:**

Reminder: the group is attempting to tackle what could be years of work in five months, so members should focus on identifying which issues and opportunities can be dealt with in the short- and long-term.

## **Data Privacy Concerns and Regulations Continued**

Ann Nagel provided a high-level overview of EU General Data Privacy Regulations (EU GDPR) to inform the workgroup's efforts. Key points include:

- At least three other countries and the EU have adopted strict data privacy laws recently. The work group should be forward-thinking as the data privacy landscape is shifting. Washington state may pursue more privacy regulations in the upcoming Legislative session.
- EU GDPR basics:
  - Applies to people physically in the EU at the time of data collection;
  - Applies when data is collected or processed ("processing" refers to anything performed on identifiable data or categories of data, which include more sensitive information about genetics, religion, sexual orientation, sex life, race, ethnicity, etc.).
- Some UW activities that may be subject to EU GDPR: recruiting, online education, study-abroad programs, research involving individuals in the EU, and alumni and donor relations.
- EU GDPR rights and requirements:
  - Personal data is owned by the individual.
  - Individuals have the right to view, access, correct, or erase their data.
  - Organizations that collect and/or process data subject to EU GDPR must:
    - Keep a record of all processing activities;
    - Have a clear purpose and lawful basis under EU GDPR for collecting and/or processing data;
    - Adhere to additional steps when using:
      - special category/highly sensitive data; or
      - data associated with youth of a certain age and/or criminal offenses.
  - When organizations consider processing data, they must:
    - Issue a notice of consent;
    - Only process data for the original purpose for which it was collected;
    - Only retain data while needed for the purpose agreed to and no longer; and
    - Complete a privacy impact assessment.
  - Any incident must be reported to the EU country pertaining to the data within 72 hours of breach discovery.

Ann and the UW Privacy Office will share their 13-page policy memo when published.

- Data Sharing under EU GDPR:
  - Sharing data requires contracts and transferring data outside the EU has additional requirements.
  - There are several lawful reasons under the Family Education Rights and Privacy Act (FERPA) to collect and share data; EU GDPR rules are different. Under EU GDPR collection and sharing of data must be necessary for legal compliance or to protect vital interests of persons or, if not, can only occur if the individual has given consent.
  - Supplemental uses of data are not permitted unless compatible with originally articulated purpose. Organizations must assess any supplemental use to gauge whether it is compatible. There's an exception for using info in public interest, but that requires an assessment also.
- The EU GDPR is still evolving and every situation requires careful evaluation to figure out whose data is involved and what regulations need compliance.

The workgroup then identified key data privacy issues as they relate to the proviso:

- Lack of clarity about who approves data requests: who makes decisions when legal requirements are ambiguous? What is the appeals process if a data sharing request is denied?
  - This lack of clarity can give the impression that data access is subject to politicization.
  - Appears to be different processes for different types of data requests. For example, at SBCTC, different data requests are handled by different departments. If the data-sharing request is legislatively mandated, the request goes straight to the Data Services team for linking and de-identification. Other requests are handled by the Research Team. If the request is not required by the Legislature, the Research Team is likely to be more restrained in its decision to share data, considering the personal liability risk should the data be compromised.
- Distinguish between role of the Institutional Review Board (IRB) and institutions' requirements to protect data under specific laws and regulations. Even if the IRB approves human subject research, a second evaluation (unrelated to IRB's decision) is needed to ensure data protection. This can be a contractual agreement with researcher(s) to guarantee good data stewardship.
- Each situation is different and each state educational authority (SEA) is organized differently, so no standard checklist is used by all institutions/agencies to assess FERPA compliance.
- When a researcher requests data, ERDC (as "middleman") passes the request to the institution. ICW can act as an additional middleman of sorts: after ERDC asks ICW then ICW asks the school, though it has no authority to compel schools.
- Some concern emerged about ERDC acting as middleman between the researchers requesting data and the agencies and/or institutions approving data access due to the perceived potential for the institution's reasoning/justification to be obscured.
- ERDC has amended its data-sharing request process recent years to incorporate advice from PTAC's best practices guidance for Integrated Data Systems (IDSs):
  1. Researcher submits a request; ERDC sends the request to the pertinent agencies and/or institutions. Agencies and institutions can say no or restrict or amend data request. ERDC does not have an appeals process.
  2. For legislatively-directed research, ERDC is mandated by statute to develop and maintain a list of research and questions the Legislature is interested in.
- The number of data requests seems to be increasing at the same time the data privacy landscape is changing. Institutions and agencies have limited resources with which to respond. Under these constraints, some agencies prioritize legislatively-mandated requests over research requests.

*Discussion of potential opportunities and solutions relating to data privacy issues.*

- Workgroup members acknowledged that Washington is a great state to do research in. Few requests for data get denied; however, some fear this could change without a transparent decision-making process.
- Potential recommendation/opportunity to improve transparency: OSPI and possibly other institutions/ agencies could emulate ERDC's data-sharing dashboard. Agency webpages showing the status of data requests could help citizens, other agencies, the Legislature, and researchers see what research is/has been done or is being pursued—and what requests got denied for what reason/s.
  - To ensure efficient use of time and resources, these dashboards should be limited to data requests that require data-sharing agreements (i.e., not every time an aggregate report is run).
  - For transparency, these dashboards should include a dropdown menu to show, if a request gets denied, the reason why. Categories should include: "X agency stated request does not meet FERPA exception threshold" and "X agency determined research question is not valid."

- Suggestion: to improve access while protecting privacy, SEAs could “fuzz” data by inserting multiple random errors into datasets, as the U.S. Census Bureau does, to de-identify data. Discussion points included:
  - It is possible to “fuzz” the data so much that a dataset no longer truly represents the intended study population.
  - ERDC has attempted “fuzzing” with minimal success in the past: a 2012 effort proved difficult and the resulting data sets were small (i.e., had very few variables).
  - According to PTAC, one or two other states are attempting to create synthetic data sets by introducing enough entropy into existing data sets. While this can help prevent re-identification, it opens questions about analyzing and making policy decisions with artificial data.
  - PTAC offers Disclosure Avoidance Tools on its website and can provide pro-bono personally-identifiable information (PII) data disclosure risk assessments.
- To reduce ad hoc requests and improve data access, ERDC plans to tie each data request to a critical question. ERDC can then process requests faster via agreements with institutions/agencies that allow redisclosure of data for specific research questions. However, the state doesn’t yet have a clear process or criteria to designate critical research questions and some worry that restricting data-sharing to prescribed research questions could unnecessarily limit the scope ed-related research in Washington.

### **Review Draft Report Outline**

The Ruckelshaus Center Team presented an emerging outline for the workgroup’s report to the Legislature:

- *Executive Summary*
- *Overview of Collaborative Process*
- *Characteristics of an Ideal System*
- *WA’s Ed Data landscape*
- *Key Issues: Simplicity, Consistency, Transparency, Accountability*
- *Recommendations Outlining Opportunities (a) – (e)*
- *Areas for Continued Work*
- *Conclusion, Appendices*

After hearing they would have multiple opportunities to review and provide input, the workgroup will did not raise issues or questions in response to the outline.

### **Duplicative Reporting Requirements**

The workgroup is still soliciting input from institutions on duplicative reporting requirements. However, the group did discuss a few potential opportunities to reduce the reporting burden:

- Currently OFM’s Forecasting division requests data-book updates from individual institutions and agencies every two years. Most institutions and agencies copy information from existing, often publicly-available repositories. It would streamline this process by automating the process or directing OFM’s Forecasting team to get the information directly from the data repositories.
  - Institutions and agencies would need to check if this can occur under their current data storage and reporting systems.
- The workgroup identified a need to review/inventory current reporting requirements to determine what existing statutes require, what information is obsolete, and what information should be added. After mapping the reporting landscape, future workgroup discussions can explore the efficacy of a centralized repository for key ed data metrics, and whether any reporting requirements can be automated or streamlined.

### **Preliminary Recommendations for Opportunities a) through e)**

The workgroup reviewed emerging recommendations to the Legislature to address potential opportunities to improve



the system. Workgroup members asked the removal of “student-level data” from recommendations involving data dashboards, as they inherently report aggregated data.

*Additional Potential Recommendations:*

- Continued discussion is needed to gauge the efficacy and desirability of creating a central repository for state education financial, enrollment, completion, and costs data. The conversation should involve a similar set of interested and affected parties and first identify what exists now (and where) before considering what it would take to consolidate these data into a common spot and whether it would be beneficial enough to key parties to make it worth the investment and updating.
- Currently OFM’s Forecasting division requests data-book updates from individual institutions every two years. Most institutions copy information from existing, often publicly available, repositories; the workgroup recommends streamlining this by automating the process or directing OFM’s Forecasting team to get the information directly from the data repositories. (Institutions and agencies would need to check if this can occur under their current data storage and reporting systems.)
- Create public-facing data request dashboards to track data requests/applications across institutions and agencies. To improve consistency and transparency, this dashboard should include a dropdown menu for reasons why a given data request could not be fulfilled (e.g., “X agency stated request does not meet FERPA exemption threshold” or “X agency determined the research question is not valid”). Including the specific agency (and ideally which section of the agency) would enable problem-solving between the data requester and prospective provider. All State education authorities should have such a publicly-available data sharing dashboard; however, to maximize time and resources, such dashboards should be limited to cases where data-sharing agreements exist (not every time an aggregate report is run).

**Next meeting:** *Wednesday, November 13th, 2019, 9:30 am – 12:30 pm, WSU Energy Program Library (Olympia)*

**Workgroup Meeting 5 Notes: Consistency, Simplicity, Transparency, and Accountability in Ed Data Systems**

Wednesday, November 13<sup>th</sup>, 2019 | 9:30 a.m. – 12:30 p.m. | WSU Energy Program Library, Olympia

**Attendees (in person, alpha order by organizational affiliation):**

Paul Francis	Council of Presidents
Dan Goldhaber	Center for Education Data and Research (UW)
Tim Norris	Education Data Center (ERDC), OFM
Terri Standish-Kuon	Independent Colleges of Washington
Casey Radostitz, Ryan McCord	Joint Legislative Audit and Review Committee (JLARC)
Michael Mann	Legislative Evaluation and Accountability Program (LEAP)
Maryann Brathwaite	Northwest Career Colleges Federation
Will Saunders	Office of the Chief Information Officer (OCIO)
Katie Weaver-Randall	Office of Superintendent of Public Instruction (OSPI)
Darby Kaikkonen	Washington State Board for Community and Technical Colleges
Dani Fumia	Washington State Institute for Public Policy
Mikel Poppe	Washington STEM
Dave Wallace	Workforce Training and Education Board (Workforce Board)

**Attendees (via Zoom):**

Sherry Gordon	Washington State University
Marc Webster	Washington Student Achievement Council (WSAC)

**Facilitation Team**

Chris Page	Ruckelshaus Center
Phyllis Shulman	Ruckelshaus Center
Hannah Kennedy	Ruckelshaus Center

**Meeting Goals:**

- Review, refine, and gauge support for emerging recommendations;
- Assess which might be ready to go forward and which require further research or discussion (for each one the group supports, discuss what additional resources would be needed); and
- Discuss future conversations to address identified needs/opportunities.

**Introduction and Agenda Review:**

In a brief review of the ground rules and collaborative decision-making process, the facilitator noted that to gauge consensus on a recommendation, the parties listed in the proviso would be asked to indicate whether their agency would support a recommendation (“thumbs-up”), could live with it (“thumb sideways”) or cannot support a recommendation in its current form (thumb down). Interested and affected parties asked to participate in an informational and advisory role. In the event one of the legislatively-named entities cannot live with a recommendation, the workgroup can keep deliberating to seek a solution that can work for all parties. If the group cannot reach consensus, the different positions can be articulated in the workgroup’s report to the Legislature.

**Review Emerging Recommendations:**

- Facilitators presented the draft potential recommendations (on “opportunities” to improve the system) capture from previous conversations. The group reviewed each recommendation, as facilitators edited in real time. Much of the draft document was identified as narrative and removed from the recommendations to be incorporated into body of the report. For a complete list of the revised recommendations, see Appendix A. Workgroup member

suggested the report and recommendations should clarify which students are included in “student-level data.” Depending on the dataset it may or may not include all students in Washington (e.g., students *not* eligible for or *not* receiving financial aid).

- Workgroup discussed the need to be explicit in cases when additional resources would be required to implement a given recommendation. Several of the emerging recommendations likely include hidden costs (e.g., additional work for agency staff, inter-agency coordination etc.).
- With the short time frame granted for the work under this legislative proviso, many of the opportunities to improve the system will need further discussion to clearly define roles, responsibilities, timelines, and investment needed.
- Workgroup members found grouping recommendations by policy goals a) through e) challenging, since some recommendations address multiple policy goals. For example, the workgroup’s recommendation that the Legislature “provide new funding to create a postsecondary data dashboard to organize and display important information from multiple data sources to answer common questions asked by the Legislature in one easy-to access place,” addresses both policy goals a) and d) in the proviso.
- Workgroup members agree that agencies and institutions should continue to work to align data definitions when possible, with recognition that some data elements have different definitions for good reason.
- Workgroup does not have a clear definition of “dashboard” and finds the term can create confusion. For the purposes of deliberating recommendations, members referred to dashboards as displays of publicly accessible aggregated data.
- FERPA compliance and data access under student privacy considerations remains difficult to interpret for some. Several members highlighted the need to educate Legislative staff and other data requesters or researchers on what research questions are permissible under FERPA or other data privacy regulations.
- Ideally, funds would be made available to support a “FERPA librarian” or similar resource, available 24/7 to guide legislatively mandated research and ensure FERPA compliance up front. Other members were more cautious about efforts to ensure FERPA compliance at the outset, as doing so may preemptively stop important and worthwhile studies from being written into bills.
- Some group members desire greater transparency in processes for handling data requests and decisions related to redisclosure. Currently ERDC serves as a middle-man conduit between data requesters and data providers. This process is perceived by some as inefficient and reducing transparency. It would help to know the “who and why” behind decisions when data access is approved, denied, or delayed.
- Access to data means different things to different users. Publicly available, aggregate-level data may meet some needs, while other data users may require access to individual-level data.
- The workgroup also discussed agencies who contribute data to ERDC as still another potential data user group to consider.
- While considering different users and data requesters, the workgroup discussed ways to better improve the utility of ERDC data systems. Ideas and opportunities discussed:
  - Should ERDC become more of an education policy research agency? It could be possible to increase ERDC’s research capacity by adding FTE specialists for research in each education “sector” (e.g., public 2-year, public 4-years, K-12, early learning, etc.).
  - Wasn’t ERDC’s data mart system, initiated in 2011, meant to address data-contributor access?
  - ERDC also emphasized the role of data-sharing agreements in ensuring data contributors also receive data back from ERDC.
  - Another idea to facilitate data access considering the increasing data requests and ERDC’s limited capacity to respond: agencies could partially fund ERDC positions to prioritize specific agency needs (e.g., OSPI could support .5 of an FTE to process OSPI data and research requests).
  - ERDC is also currently developing a list of critical questions to help prioritize data access requests. ERDC will review research requests to determine if they align with such preapproved critical questions. More information is needed to clarify the decision-making process. Some members pointed out it may be difficult to determine if research studies align or do not align with the list of preapproved questions. The subjective

nature of determining such alignment could lead to gray areas, requiring data contributors (e.g., institutions) to determine whether to approve or deny data request.

Facilitators provided a brief report update and aim to disseminate a draft report to workgroup by Tuesday, November 26<sup>th</sup>, if not sooner.

**Next meeting:** *Wednesday, December 4th, 2019, 9:30 am – 12:30 pm, WSU Energy Program Library (Olympia)*

**Workgroup Meeting 6 Notes: Consistency, Simplicity, Transparency, and Accountability in Ed Data Systems**

Wednesday, December 4<sup>th</sup>, 2019 | 9:30 a.m. – 12:30 p.m. | WSU Energy Program Library, Olympia

**Attendees (in person, alpha order by organizational affiliation):**

Paul Francis	Council of Presidents
Tim Norris	Education Data Center (ERDC), OFM
Jim Schmidt	Education Data Center (ERDC), OFM
Ryan McCord	Joint Legislative Audit and Review Committee (JLARC)
Michael Mann	Legislative Evaluation and Accountability Program (LEAP)
Amy Brackenbury	Northwest Career Colleges Federation
Maryann Brathwaite	Northwest Career Colleges Federation
Katie Weaver-Randall	Office of Superintendent of Public Instruction (OSPI)
Darby Kaikkonen	Washington State Board for Community and Technical Colleges
Dani Fumia	Washington State Institute for Public Policy
Elizabeth McAmis	Washington State Office of the Attorney General
Jean Wilkinson	Washington State Office of the Attorney General

**Attendees (via Zoom):**

Ann Nagel	University of Washington (UW)
Bill Zumeta	UW Evans School of Public Policy and Governance
Sherry Gordon	Washington State University
Jenée Myers Twitchell	Washington STEM
Mikel Poppe	Washington STEM
Marc Webster	Washington Student Achievement Council (WSAC)
Michele Alishahi	WA Senate Fiscal Analyst
Stephanie Nelson	WA House of Representatives: Republican Caucus Staff

**Facilitation Team**

Chris Page	Ruckelshaus Center
Phyllis Shulman	Ruckelshaus Center
Hannah Kennedy	Ruckelshaus Center

**Meeting Goals:**

- Finalize recommendations;
- Review and clarify next steps.

**Introduction and Agenda Review:**

The facilitators thanked workgroup members for their hard work and commitment to the collaborative process thus far. The Ruckelshaus Center team received feedback on the latest draft report and recommendations from several members. The draft documents discussed in this meeting reflect the comments and suggestions received as of December 2<sup>nd</sup>. Despite the short time frame, all workgroup members will get at least one more chance to review and comment on the report. The Ruckelshaus team plans to submit the final report to the Legislature on or by December 18<sup>th</sup>, 2019.

**Discussion of Issues Related to Draft Report and Recommendations:**

Before launching into the meeting focus (the workgroup recommendations) the Ruckelshaus Center solicited feedback on and facilitated a brief discussion of the entire draft report document.

- Workgroup members felt the numerous caveats and context included with each recommendation made the recommendations hard to follow and suggested moving the commentary from the recommendations to come after, with in-text links.
- Several workgroup members highlighted the distinction between external researchers (e.g., academic researchers) and state agency employees tasked with doing education research. Some group members felt the report conflated these. The workgroup noted that while both types of researchers provide public value and knowledge, multiple members felt that ERDC should prioritize access for state-funded research by state agencies. According to ERDC, such prioritization is already mandated in [their founding statute](#).
  - An external researcher agreed with this reading of ERDC's statute and indicated that statutory changes may be needed to realize the proviso's aim *"to increase[...] external researcher access to P-20 systems in service to state education goals."* Participants also acknowledged how hard ERDC has worked to fulfill data requests that fall outside their state-issued statute.
  - Other workgroup members agreed and asked that recommendation e) 1 be amended to reflect this.
  - The external researcher also recommended looking into what steps other states have taken to prioritize external researchers' data needs. Such an investigation should consider how other states fund their longitudinal P-20 data centers, including how fees for service could be implemented, with the stipulation that ERDC may wave such fees.
- ERDC's federal funding contracts with the Department of Education require that all SLDS programs be subject to human subject research reviews. This appears to create a "gray area" and ERDC is unsure whether they should just make everyone go through IRB review because data redisclosure requests necessarily involve individual-level data.
- Some workgroup members expressed concern about the data-sharing provision stipulating that ERDC and data contributors review results and analysis of research prior to publication. Questions arose about how to protect integrity of independent research while ensuring data privacy protection. ERDC assured group they have not—nor would they ever—stop research from being published. This should be clarified in the final report.
  - ERDC and workgroup member agreed PTAC's best practices guidance could help shed light on this in the report.
  - ERDC also explained that pre-publication review comments by data contributors (state agencies) are passed on to the researcher(s)/report author(s).
- Regarding the concern articulated in the report that public institutions, as educational authorities, might deny redisclosure based on the politics associated with the question being asked. Council of Presidents and UW representatives know of no instance of this ever happening and do not see this as a future risk.
- An independent researcher stated that they have never had political reasons cited as a reason not to receive data for an independent research project, but also noted that they supported more transparency around the data access process in general.
- ERDC and other workgroup members asked that the phrase "conflict of interest" be struck from the report. The group acknowledged that agencies and other actors may face *competing interests* but felt "conflict of interest" did not accurately capture this.
- ERDC representatives expressed concern that the draft report appears to indicate the agency's past funding requirements have not been met. ERDC asked removal of these references, given that the agency fulfilled grant objectives to the satisfaction of the federal Department of Education and all executive sponsors.
- A workgroup member, with agreement from the larger group, suggested that opinions and commentary language in the introduction section of the report be moved to an appendix.
- JLARC, LEAP and WSIPP representatives indicated that as nonpartisan institutions, they must abstain from signing onto recommendations requesting additional funding for state agencies to avoid lobbying perceptions.
- The workgroup agreed to amend a recommendation to create pathways for data requesters to seek input from PTAC. A workgroup member clarified that while PTAC is an excellent FERPA resource, they usually will avoid giving a formal opinion, thus the AG's office should be consulted for formal interpretations. However, it should also be clarified that there is no central "FERPA place" in the AG's Office, instead each agency has their own AAG with whom they should consult.

- Workgroup member suggested that the recommendation to create a list of critical research questions stipulate that the list be periodically reviewed and updated.
- Workgroup members present requested input from ESD to ensure the agency can sign-on to recommendations related to proviso policy goal b).

Facilitators thanked participants for their work thus far and aim to disseminate revised draft report and recommendations on Friday, December 6<sup>th</sup>, with workgroup feedback due by Friday, December 13<sup>th</sup>.

## Appendix D: Major Themes from Assessment Interviews

- Questions around proviso intent; some interviewees found it vague, complex and ambitious, and possibly representing some duplicative efforts.
- Many respondents emphasized Washington’s existing P-20 longitudinal data system as a national model, though access to this “model” resource remains an issue. ERDC has a lot of high-quality data, but it is not perceived as accessible beyond a limited number of prescribed reports. We heard (from diverse parties) a desire for increased and quicker access to data.
- Current education data landscape lacks clarity—different ideas about what data exists and where the data are housed. Several respondents suggested a data inventory or assessment would be helpful.
- Early learning (pre-K or P) and K-12 data described as highly centralized, particularly when compared to the multiple entities collecting and maintaining higher education data.
- Several interviewees highlighted the need to improve *data governance* (i.e., the organizational process that surrounds decisions about how data is obtained, used, stored, shared, and protected) and specifically called out the need for:
  - Clarity and consensus on what data (both educational and workforce) can be released and when; and
  - Standardized data request prioritization system
- Several agencies have higher education data dashboards (e.g., WSAC, SBCTC, Workforce Board, ERDC). Some interviewees questioned the need for a new single system dashboard, and instead suggested the workgroup discuss ways to enhance and/or combine or link existing dashboards (provided the metrics and student numbers align across systems).
- Parties appear to agree that increased access to data and greater cross-agency sharing are worthwhile goals. However, lack of resources, bandwidth and privacy concerns were identified as potential challenges.
- Several key parties suggested the workgroup start by identifying:
  - What questions are being asked of the education data, by whom, and for what purposes?
  - What questions cannot be answered because the data does not exist?
  - What does the Leg. want the data to answer?
- Potential to evolve system toward consolidated, integrated, cloud-based data storage to support policy goals of increased consistency, simplicity, transparency, and accountability. Although it would require significant investment over multiple years, streamlining the process and linking data from non-educational sectors (e.g., Department of Social and Health Services etc.), could allow for faster and more robust cross-sector policy analysis.
- Interviewees perceive ERDC’s strengths as accessing, cleaning, longitudinal linking and matching, and creating and maintaining network channels for others to access data.
- It is difficult to accurately match programs/majors/credentials to labor market outcomes because:
  - Some pathways may prepare you for multiple sectors and drawing direct link from education degree/outcome to labor market may not reflect this; and
  - Occupation-level data not readily available, making it difficult to know whether an individual is working in their field of study.



## **Appendix E: Excerpts from the ERDC 2015 SLDS Grant Application**

“Generally, ERDC staff provide two types of data to requestors, public-use data and restricted-use data:

- Public-Use Data are data that are aggregated and contains no individual-level data (unit records). The data are in a table format acceptable for publication purposes and does not require a data-sharing agreement.
- Restricted-Use Data are data at the individual (unit-record) level. Even when de-identified, individual-level data may contain sufficient information, when matched with other information, to allow a reasonable person to identify an individual. A data-sharing agreement with the ERDC is required before receiving a restricted-use data set.

Principle 3: Protecting the privacy of individuals is a priority Three levels of data can be extracted from the data warehouse:

1. Highly Restricted-Use Data (Level 1) - Data that include information about the identity of individuals and employers is confidential. Level 1 is the term for data that contains individually identifiable information. Level 1 data require specific procedures to protect confidentiality per FERPA regulations and other state and federal requirements. These types of data are rarely shared and shall only be used for unit record matching purposes.

- a. Access to Level 1 data requires a formal request that must be approved by a Data Request Review Board and any other data contributors.

2. Restricted-Use Data (Level 2) – Data at the unit record level but containing no individually identifiable information. Level 2 data are all information in those files and all information derived from those data including data resulting from merges, matches or other uses of the data. Merging Level 1 data records with Level 2 data records results in a merged file that is Level 1. Merely deleting identity fields from a Level 1 files does not necessarily create a Level 2 file. Disaggregation of Level 2 records, even without explicit identification fields, may result in a record where the identity of the subject could be reasonably inferred.

- a. Access to Level 2 data requires a data sharing agreement with ERDC (data contributors do not have to sign the agreement).

3. Public-Use Data (Level 3) – Data aggregated from Level 2 data that contain no unit record data, is for public use, and acceptable for publication purposes. Access to Level 3 data is unrestricted.”

## Appendix F: Current Washington State Education Data Dashboards

Agency	Dashboards	Purpose and Target Audience
State Board of Community and Technical Colleges	<a href="#">Credentials Awarded Dashboards</a>	Public
	<a href="#">Enrollment Dashboards</a>	Public
	<a href="#">Strategic Enrollment Dashboards</a>	Public
	<a href="#">After College Status: Professional-Technical Programs and Apprenticeships</a>	Public
	<a href="#">Transfers</a>	Public
Education Research and Data Center	<a href="#">Juvenile Justice Dashboard</a>	Policymakers
	<a href="#">High School Graduate Outcomes</a>	Policymakers, students, and parents
	<a href="#">Statewide Public Four-Year Dashboard</a>	Policymakers, students, and parents
	<a href="#">Earnings for Graduates Dashboard</a>	Policymakers, students, and parents
	<a href="#">Early Learning Feedback Report</a>	Policymakers, students, and parents
	<a href="#">State Need Grant Recipient's Educational Progress and Degree Completion</a>	Policymakers, students, and parents
	<a href="#">Higher Education Finance Report</a>	Policymakers, students, and parents
Workforce Training and Education Coordinating Board	<a href="#">Career Bridge</a>	Public, specifically individuals looking to retrain for career purposes
	<a href="#">Skill Gap Analysis- High Employer Demand Fields</a>	Policy-makers and employers
	<a href="#">Workforce Training Results by Program</a>	Policymakers, employer and job seekers
Washington Student Achievement Council	<a href="#">WSAC Road Map</a>	Policymakers and public
Employment Security Department	<a href="#">WorkSource</a>	Policymakers
Washington State Fiscal Information	<a href="#">Higher Education Resources</a>	Policymakers

## **Appendix G: Sample Questions to Illustrate What Current ERDC Data Can Answer, May Be Able to Answer, and Cannot Answer**

### **CATEGORY 1 – Examples of Qs recently addressed using data provided by ERDC:**

1. *What are the effects of Washington’s Early Childhood Education Assistance Program on educational and non-educational outcomes?*

Answers: [https://www.wsipp.wa.gov/ReportFile/1576/Wsipp\\_Outcome-Evaluation-of-Washington-States-Early-Childhood-Education-and-Assistance-Program\\_Report.pdf](https://www.wsipp.wa.gov/ReportFile/1576/Wsipp_Outcome-Evaluation-of-Washington-States-Early-Childhood-Education-and-Assistance-Program_Report.pdf)

2. *Are students with disabilities who participate in a concentration of CTE courses in high school more likely to be employed after they graduate?*

Answers: <https://caldercenter.org/sites/default/files/WP%20177.pdf>

3. *What are the effects of the College Bound Scholarship program?*

Answers: [http://www.wsipp.wa.gov/ReportFile/1701/Wsipp\\_The-Effectiveness-of-Washington-s-College-Bound-Scholarship-Program\\_Supplemental-Report.pdf](http://www.wsipp.wa.gov/ReportFile/1701/Wsipp_The-Effectiveness-of-Washington-s-College-Bound-Scholarship-Program_Supplemental-Report.pdf)

<http://www.cedr.us/papers/working/CEDR%20Working%20Paper%20No.%2005302017-2-1.pdf>

### **CATEGORY 2 – Sample Qs that could be answered using WA data, but where**

- the ability to do the research to answer them may need to be adjusted to focus on an education program (related to FERPA’s Audit or Evaluation exception); and
  - there may be a process to have data providers agree to have their data used in answering the question.
4. *What are the educational outcomes of children in child welfare or juvenile justice programs in Washington?*
  5. *Are Washington’s prison education programs effective in promoting educational attainment, employment and earnings of formerly incarcerated individuals?*
  6. *Are STEM teachers who take more, or perform better in, STEM courses in college more effective teachers and are they more likely to stay in the Washington teaching workforce?*
  7. *What are the economic returns to certificates and degrees from different Washington colleges?*

### **CATEGORY 3 – Sample Qs that *cannot* currently be answered because of gaps in the data being collected or linked (see the ERDC data matrix below)<sup>35</sup>:**

8. *Did Washington’s Medicaid expansion improve the educational achievement or attainment of low-income students?*
9. *Is educational attainment predictive of the likelihood of adult homelessness?*
10. *Do interventions under Washington’s Perinatal and Neonatal Level of Care Guidelines<sup>36</sup> impact the schooling or adult outcomes for very low birthweight babies?*

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<sup>35</sup> Workgroup member question: are these not answerable because the ERDC has yet to collect the data or are they not answerable due to legal constraints? This is an important distinction; if the Legislature wants ERDC to collect something like Medicaid data, it may need to authorize that agency in statute to do so.

<sup>36</sup> See <https://www.doh.wa.gov/Portals/1/Documents/Pubs/950154.pdf>

ERDC Data Availability Status				
	Data Cross Linked		Not Cross Linked	
Data Source	fully linked	limited use	not linked on ERDC premises	not on ERDC premises
public ESIT (Early Support for Infants and Toddlers	x			
public Early Childhood Education Assistance Program	x			
Head Start				x
Public k12 enrollment, ach, assessment	x			
Public k12 Career and Technical Education				
Private k12				x
Public 2yr enrollment, degree	x			
Public 4yr enrollment, degree	x			
Private PS enrollment, degree		x		
Apprenticeships	x			
Licensed occupations				x
Private Vocational school			x	
Foster care (DCYF)		x		
Homeless (non-OSPI)				x
Subsidized Childcare		x		
Temporary Aid for Needy Families (TANF) / other assistance eligibility				x
TANF/other assistance awarded				x
Workforce	x			
UI Claimants	x			

ERDC Data Availability Status				
	Data Cross Linked	Not Cross Linked		
Data Source	fully linked	limited use	not linked on ERDC premises	not on ERDC premises
WIOA participants				x
Birth records		x		
OutofStatePS				x
OutofState Workforce				x
Department of Corrections inmates and education	x			
Administrative Office of the Courts / Juvenile Justice		x		
Jail bookings	x			
College Bound applicants	x			
Unit Record- WA publics	x			
Free Application for Federal Student Aid				x
Unit Record-WA privates				x
Postsecondary (PS) Finance				x
PS staffing				x
K12 staffing		x		
<b>Terms:</b>  --Fully Linked: Operational data loading exists --Limited use: matched for one particular research project only; data and usage constraints				

## Appendix H: Steps in Data Request Process, with Comments Submitted

The basic steps in the data request process, with workgroup member commentary:

1. Researchers fill out a data request form, which ERDC evaluates by considering research methodology (i.e., is redisclosure necessary?) and assessing FERPA compliance (does research request fall under audit/evaluation or other FERPA exception?).
  - *Comment:* This can be a frustrating process for some researchers, particularly when they get asked whether other methodologies could be used, despite receiving project approval from other entities (e.g., internal review boards or the federal Institute of Education Sciences).
2. ERDC works with individual data contributors to approve all redisclosure requests (regardless of whether they found an initial FERPA concern). When considering whether to redisclose data, institutions look at FERPA and other privacy regulations and principles, indemnification clauses and data security protocols, along with considering the institution's relationships with students and alumni.
  - *Comment:* A participant expressed concern that this discretionary process enables institutions to approve or reject researcher data requests for political reasons (i.e., if the institution thought such a study might harm its reputation). Other workgroup members said they had never heard of this occurring.
3. If a redisclosure request is approved, ERDC works with the researcher to develop a data sharing agreement. Such agreements stipulate what data will be shared, how it will be used, the security protocols the researcher will follow to ensure data privacy and security, and what happens to the data after the research project is complete.
  - *Comment:* Some group members suggested ERDC should establish and communicate data access timelines so researchers can incorporate these into their own project schedules.
4. When all applicable data-sharing agreements have been signed, the data request enters ERDC's processing queue where ERDC staff will prepare, assemble and transfer the data.
  - *Comment:* A workgroup member commented that it is not clear how ERDC determines this queue.
5. Researchers submit completed draft paper(s) to ERDC for review; ERDC then shares them with data providers.
  - *Comments:* Data requesters and other group members noted the importance of this review step to ensure the accuracy of data and associated definitions. While one theorized that this process could pressure researchers to present their findings in a certain way, others clarified that review occurs only for privacy protection and accuracy, and that no sanctions exist—and no papers had ever been changed or handled differently based on their findings and conclusions.

Related to data requests and data access: a workgroup member suggested a potential "conflict of interest" could arise when an agency or institution has the authority to release PII data but can deny redisclosure under the studies exception if the education authority does not deem the research question(s) as having "utility." This could occur in instances where the institution or agency may have an interest (or perceived interest) in not releasing data, e.g., since the data or associated research might be perceived to reflect poorly on the institution/agency. This "utility clause" may cause institutions to overlook larger public policy perspectives (the workgroup member noted that institutions opting out of research could potentially undermine the quality of the research and/or the belief that the research provides comprehensive and objective answers to the policy or practice questions it seeks to address).

Other workgroup members responded that they had never heard of an institution doing this, and that "the data is the data" and should be made available, if possible.

## Appendix I: List of Duplicative Data Elements Submitted

While the Ruckelshaus Center worked with ICW, SBCTC, NWCCF, and the COP to issue several invitations and reminders to postsecondary institutions to provide duplicative reporting requirements, only two were provided. The SBCTC representative submitted the following:

*“As far as the duplicative reporting requirements...no, there isn’t any scenario that I can think of where we report data 100% the exact same way to separate agencies/entities. We do a lot of different reporting that is similar, but because everyone seems to need it in a different way, it isn’t truly duplicative.*

*Maybe something like a description of some of the external reporting we do would be more meaningful?*

- *Quarterly data transmissions to ERDC. Includes student, course, transcript, completions, and student/course attribute data*
- *Annual data transmissions to the Workforce Board for their legislatively required reports, such as the Workforce Training Results and Net Impact Study*
- *3 times a year reporting to IPEDS for some (not all) of the requirements. These processes are linked to the reporting requirements and shift as those change. Often times IPEDS requirements **do not** align with common questions and requests for information, so we’ll develop something new to try and fill in the gaps. This might be where it seems there is some duplicating going on.*
  - *For example, IPEDS graduation rates only look at a very small portion of students at the community and technical colleges, and the reporting schedule varies for the CTC’s who offer applied baccalaureate degrees. We’ve built separate completion and progress metrics dashboards to account for our student population in a more comprehensive way. Most of these dashboards are not available to the public.*
- *Legislative and OFM requests: these come in all shapes and sizes, depending on what the question is. Occasionally we can recycle and repurpose a data query to meet a similar question, but most of the time they are just different enough that it requires new queries.”*

WSU also responded along the following lines: *In reviewing the many reports WSU sends to Washington state agencies, duplication appeared in data elements, not necessarily entire reports. Therefore, the Executive Director of Institutional Research outlined the data elements that appear in more than one of the reports itemized in the spreadsheet submitted (includes URR, CSAW, and PCHEES).*

<u>Duplicative data elements</u>	<u># of reports that contain data element</u>	<u>Duplicative data elements</u>	<u># of reports that contain data element</u>
Birth date	2	Last name	3
College Bound Scholarship (by term)	2	number in college	2
Enrollment status (by term)	3	Race	2
family income	2	Sex (gender)	2
Family size	2	SSN	3
First name	3	State Need Grant (by term)	2
Hispanic	2	Student ID	2
Year in school (class standing)	2	WA Resident	2

In the interest of completeness, below are the underlying Data Structures provided by WSU's Executive Director for Institutional Research for analysis of duplicate reporting:

<u>URR Structure (WASC)</u>	<u>CSAW Structure (WASC)</u>	<u>PCHEES Structure (ERDC)</u>
SSN	Ssn	Record Number
InstitutionStudentID	SchoolCode	Enrollment Year
LastName	LastName	Enrollment Term
FirstName	FirstName	Institution ID
MiddleName	MiddleInitial	Course Provider Campus ID
DateOfBirth	FamilySize	Enrollment Term System
Gender	NumberInCollege	Enrollment Term Start Date
IsStateResident	FamilyIncome	Enrollment Term End Date
YearInSchool	FallEnrollmentStatus	Enrollment Term Census Date
IsOfHispanicOrigin	FallTermType	Student ID (Institution)
IsRaceAmericanIndianAlaskaNative	FallAppliedBaccalaureate	Student Type
IsRaceAsian	FallCbsAwardAmount	Student Running Start Affiliation
IsRaceBlackAfricanAmerican	FallPtcAwardAmount	Student County of Origin at Last Admission
IsRaceNativeHawaiianPacificIslander	FallSngAwardAmount	Student State of Origin at Last Admission
IsRaceWhite	FallSngDca	Student Nation of Citizenship at Last Admission
IsRaceOther	FallSngAwardIsServed	Student Co-Enrolled Indicator
MaritalStatus	WinterEnrollmentStatus	Student K-12 State ID
IsDependent	WinterTermType	Student High School Code
FamilySize	WinterAppliedBaccalaureate	Student High School Completion Type
NumberInCollege	WinterCbsAwardAmount	Student High School Completion Year
FamilyIncome	WinterPtcAwardAmount	Student High School Year Last Attended
CostOfAttendance	WinterSngAwardAmount	Student High School GPA
ExpectedFamilyContribution	WinterSngDca	Student Previous Institution Code
NeedDuration	WinterSngAwardIsServed	Student Previous Institution Last Year Attended
NeedAmount	SpringEnrollmentStatus	Student Previous Institution GPA
Summer1EnrollmentStatus	SpringTermType	Student Previous Institution Degree Level
Summer1FederalPellGrant	SpringAppliedBaccalaureate	Student Previous Institution Degree Acronym
Summer1FederalSEOG	SpringCbsAwardAmount	Baccalaureate Previous Credits Earned -- Total
Summer1FederalTEACHGrant	SpringPtcAwardAmount	Baccalaureate Previous Credits Transferred -- Total
Summer1FederalNursingScholarships	SpringSngAwardAmount	Baccalaureate Previous Credits Transferred -- AP
Summer1FederalWorkStudy	SpringSngDca	Baccalaureate Previous Credits Transferred -- IB
Summer1FederalPerkinsLoan	SpringSngAwardIsServed	Student SAT Math Score
Summer1FederalNursingHealthLoans	Summer1EnrollmentStatus	Student SAT Critical Reading (Verbal) Score
Summer1FederalDirectSubsidizedLoans	Summer1TermType	Student SAT Writing Score
Summer1FederalDirectUnsubsidizedLoans	Summer1AppliedBaccalaureate	Student ACT English Score
Summer1FederalParentPLUSLoans	Summer1CbsAwardAmount	Student ACT Math Score
Summer1FederalGradPLUSLoans	Summer1PtcAwardAmount	Student ACT Reading Score
Summer1StateNeedGrant	Summer1SngAwardAmount	Student ACT Science Score



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<u>URR Structure (WASC)</u>	<u>CSAW Structure (WASC)</u>	<u>PCHEES Structure (ERDC)</u>
Summer1CollegeBoundScholarship	Summer1SngDca	Student ACT Composite Score
Summer1PassporttoCollegeScholarship	Summer1SngAwardIsServed	Student ACT Writing Score
Summer1GETReadyforMathScience	Summer2EnrollmentStatus	Student Admission Campus ID
Summer1OpportunityScholarship	Summer2TermType	Student Admit Year
Summer1SBCTCOpportunityGrant	Summer2AppliedBaccalaureate	Student Admit Term
Summer1OtherStateFundedGiftAssistance	Summer2CbsAwardAmount	Student Previous Institution Degree DTA/AST Status
Summer1OnCampusStateWorkStudy	Summer2PtcAwardAmount	Student SAT Date Taken
Summer1OffCampusStateWorkStudy	Summer2SngAwardAmount	Student SAT Math Section Score
Summer1WorkForceTrainingFunds	Summer2SngDca	Student SAT Evidence Based Reading and Writing Section Score
Summer1NeedBasedInstitutionalGiftAid	Summer2SngAwardIsServed	Student SAT Math Subsection Score
Summer1NonNeedBasedInstitutionalGiftAid		Student SAT Reading Subsection Score
Summer1InstitutionalEmployment		Student SAT Writing and Language Subsection Score
Summer1InstitutionalLoans		Student Last Name
Summer1ConditionalLoans		Student First Name
Summer1PrivateLoans		Student Middle Name
Summer1OtherLoans		Student Name Suffix
Summer1OutsideScholarships		Student SSN
Summer1OtherAgencyAssistance		Student Birth Date
FallEnrollmentStatus		Student Sex
FallFederalPellGrant		Student Race 1
FallFederalSEOG		Student Race 2
FallFederalTEACHGrant		Student Race 3
FallFederalNursingScholarships		Student Race 4
FallFederalWorkStudy		Student Race 5
FallFederalPerkinsLoan		Student Hispanic Identity 1
FallFederalNursingHealthLoans		Student Hispanic Identity 2
FallFederalDirectSubsidizedLoans		Student Hispanic Identity 3
FallFederalDirectUnsubsidizedLoans		Student U.S. Immigration Status
FallFederalParentPLUSLoans		Student WA Residency Status
FallFederalGradPLUSLoans		Student Primary Enrollment Campus ID
FallStateNeedGrant		Student Primary Enrollment Site
FallCollegeBoundScholarship		Baccalaureate Class Standing
FallPassporttoCollegeScholarship		Student First Major: Program ID
FallGETReadyforMathScience		Student First Major: Program Concentration ID
FallOpportunityScholarship		Student Term GPA
FallSBCTCOpportunityGrant		Student Cumulative Institutional GPA
FallOtherStateFundedGiftAssistance		Student Cumulative Overall GPA
FallOnCampusStateWorkStudy		Student Military Status
FallOffCampusStateWorkStudy		Student Military Federal Benefits Type
FallWorkForceTrainingFunds		Student Tuition Fee Type
FallNeedBasedInstitutionalGiftAid		Student Non-Resident Tuition Fee Exemption 1

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<u>URR Structure (WASC)</u>	<u>PCHEES Structure (ERDC)</u>
FallNonNeedBasedInstitutionalGiftAid	Student Non-Resident Tuition Fee Exemption 2
FallInstitutionalEmployment	Student Non-Resident Tuition Fee Exemption 3
FallInstitutionalLoans	Student Tuition Fee Waiver 1
FallConditionalLoans	Student Tuition Fee Waiver 2
FallPrivateLoans	Student Tuition Fee Waiver 3
FallOtherLoans	Student Self-Reported Disability Status
FallOutsideScholarships	Student Pell Grant Status
FallOtherAgencyAssistance	Student State Need Grant Status
WinterEnrollmentStatus	Course ID
WinterFederalPellGrant	Course Section ID
WinterFederalSEOG	Course Number
WinterFederalTEACHGrant	Course Title
WinterFederalNursingScholarships	Course Subject
WinterFederalWorkStudy	Course Subject CIP Code
WinterFederalPerkinsLoan	Course Section Instructional Type
WinterFederalNursingHealthLoans	Course Section Duration
WinterFederalDirectSubsidizedLoans	Course Section Instruction Delivery Type
WinterFederalDirectUnsubsidizedLoans	Course Section Instruction Delivery Site
WinterFederalParentPLUSLoans	Course Section Online Learning Type
WinterFederalGradPLUSLoans	Course Section Remedial Learning Indicator
WinterStateNeedGrant	Course Section Start Date
WinterCollegeBoundScholarship	Course Section End Date
WinterPassporttoCollegeScholarship	Course Section Variable Dates Indicator
WinterGETReadyforMathScience	Course Section Administrative Unit
WinterOpportunityScholarship	Course Section Registration Sequence
WinterSBCTCOpportunityGrant	Course Section Repeat Course Indicator
WinterOtherStateFundedGiftAssistance	Course Section Registration State Funding Source
WinterOnCampusStateWorkStudy	Course Section Credit Hours Attempted
WinterOffCampusStateWorkStudy	Course Section Credit Hours Earned
WinterWorkForceTrainingFunds	Course Section Grade Letter
WinterNeedBasedInstitutionalGiftAid	Course Section Remedial Learning Registration Type
WinterNonNeedBasedInstitutionalGiftAid	Course Section Grade Number
WinterInstitutionalEmployment	Program ID
WinterInstitutionalLoans	Program Concentration ID
WinterConditionalLoans	Program Degree/Certificate Acronym
WinterPrivateLoans	Program Degree/Certificate Name
WinterOtherLoans	Program Degree/Certificate Level
WinterOutsideScholarships	Program Completion Credits Required
WinterOtherAgencyAssistance	Program Field of Study
SpringEnrollmentStatus	Program Field of Study CIP Code
SpringFederalPellGrant	Program Field of Study Institutional Code

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<u>URR Structure (WASC)</u>	<u>PCHEES Structure (ERDC)</u>
SpringFederalSEOG	Program Concentration
SpringFederalTEACHGrant	Program Concentration CIP Code
SpringFederalNursingScholarships	Program Concentration Institutional Code
SpringFederalWorkStudy	Student Completion Year
SpringFederalPerkinsLoan	Student Completion Term
SpringFederalNursingHealthLoans	Student Completion Campus ID
SpringFederalDirectSubsidizedLoans	Student Completion First Major: Program ID
SpringFederalDirectUnsubsidizedLoans	Student Completion First Major: Program Concentration ID
SpringFederalParentPLUSLoans	Student Completion Second Major
SpringFederalGradPLUSLoans	Student Completion First Minor
SpringStateNeedGrant	Student Completion Second Minor
SpringCollegeBoundScholarship	Student Teaching Certification ID
SpringPassporttoCollegeScholarship	Student Completion Non-Institutional Credits Earned
SpringGETReadyforMathScience	Student Completion Institutional Credits Earned
SpringOpportunityScholarship	Student Post-Baccalaureate Degree Indicator
SpringSBCTCOpportunityGrant	
SpringOtherStateFundedGiftAssistance	
SpringOnCampusStateWorkStudy	
SpringOffCampusStateWorkStudy	
SpringWorkForceTrainingFunds	
SpringNeedBasedInstitutionalGiftAid	
SpringNonNeedBasedInstitutionalGiftAid	
SpringInstitutionalEmployment	
SpringInstitutionalLoans	
SpringConditionalLoans	
SpringPrivateLoans	
SpringOtherLoans	
SpringOutsideScholarships	
SpringOtherAgencyAssistance	
Summer2EnrollmentStatus	
Summer2FederalPellGrant	
Summer2FederalSEOG	
Summer2FederalTEACHGrant	
Summer2FederalNursingScholarships	
Summer2FederalWorkStudy	
Summer2FederalPerkinsLoan	
Summer2FederalNursingHealthLoans	
Summer2FederalDirectSubsidizedLoans	
Summer2FederalDirectUnsubsidizedLoans	
Summer2FederalParentPLUSLoans	
Summer2FederalGradPLUSLoans	
Summer2StateNeedGrant	
Summer2CollegeBoundScholarship	
Summer2PassporttoCollegeScholarship	
Summer2GETReadyforMathScience	

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<b>URR Structure (WASC)</b>
Summer2OpportunityScholarship
Summer2SBCTCOpportunityGrant
Summer2OtherStateFundedGiftAssistance
Summer2OnCampusStateWorkStudy
Summer2OffCampusStateWorkStudy
Summer2WorkForceTrainingFunds
Summer2NeedBasedInstitutionalGiftAid
Summer2NonNeedBasedInstitutionalGiftAid
Summer2InstitutionalEmployment
Summer2InstitutionalLoans
Summer2ConditionalLoans
Summer2PrivateLoans
Summer2OtherLoans
Summer2OutsideScholarships
Summer2OtherAgencyAssistance

## **Overview of the PCHEES Data Model**

PCHEES was built to provide data for Higher Education Enrollment Reports (HEER), Budget Driver Reports, and Public Higher Education Enrollment Projections published by the OFM Forecasting Division. Ten years of enrollment data collected from public four-year postsecondary institutions in Washington on the tenth day of each academic term were stored in the original PCHEES database.

PCHEES was expanded to accept institutional submissions of data on student admissions, term enrollment outcomes, and degree completions. This expansion was undertaken to support the research and reporting needs of higher education institutions, the Higher Education Coordinating Board (HECB), and OFM's Educational Research and Data Center (ERDC). The PCHEES database will serve as the primary source for public four-year higher education data in the ERDC's new Statewide Longitudinal Education Data System.

The following is a brief summary of the seven files that comprise the two PCHEES data collections:

1. A TermDates file consists of just one record providing the institution's term type (quarter or semester), term start date, term end date, and the data collection date for a collection term. See PCH-F0010 and PCH-F0020 for detailed information about the two versions of this file.
2. The Admission file provides information about the student at the time the student was admitted to the institution. This data includes information relating to the student's origin (county, state and nation of citizenship), Running Start affiliation, last high school, previous higher education institution, previous credits and degrees completed and college entrance exam scores. See PCH-F0070 and PCH-F0080 for detailed information about the two versions of this file.
3. The Student file provides information about the student's identifying information, demographic characteristics, baccalaureate class standing, first major, GPA and tuition fee related information. See PCH-F0090 and PCH-F0100 for detailed information about the two versions of this file.
4. The Course file provides information about the courses that students can enroll in each term. This data includes information about course level, course name, course funding, credits hours, course subject CIP, how the instruction is delivered (e.g., face-to-face, web based), remedial learning indicator, start and end dates. See PCH-F0110 and PCH-F0120 for detailed information about the two versions of this file.
5. The Registration file provides information about each student's course enrollment for the term. This data includes information on the student's State funding source for the enrollment, attempted credit hours, earned credit hours, grade and remedial learning indicator WA Education Research and Data Center (Office of Financial Management, LEAP Committee) Public Centralized Higher Education Enrollment System (PCHEES) PCHEES Data Submission Guide (version 1.20.7) See PCH-F0130 and PCH-F0140 for detailed information about the two versions of this file.
6. A Program file provides information about the kinds of degree and certificate programs, also areas of academic concentration within such programs, in which students pursue a first major.
  - An institution's own descriptions of the degree/certificate, field of study, and area of concentration (if any) associated with a student's program of study.
  - The IPEDS degree level for the student's academic program.
  - The total number of credits required for receipt of a degree/certificate in the paradigmatic case where a student is pursuing the degree/certificate as a first degree/certificate of that kind with only one major, no minors, and no endorsements. (As WSU, CWU and other institutions have reported, this data element -- previously contained in the Completion file -- was difficult to calculate because there it was a student-specific calculation tied to variable details about each student's program affiliations). See PCH-F0050 and PCH-F0060 for detailed information about the two versions of this file.

7. The Completion file provides information about the certificates and degrees awarded to the student in the term. This data includes information on the certificate or degree program, area of concentration, credits earned toward the certificate/degree and teaching certification identifier. See PCH-F0150 for detailed information about this file.
8. A Program file provides information about the kinds of degree and certificate programs, also areas of academic concentration within such programs, in which students pursue a first major.
  - An institution's own descriptions of the degree/certificate, field of study, and area of concentration (if any) associated with a student's program of study.
  - The IPEDS degree level for the student's academic program.

Final Term Dates	Final Admission	Final Student	Final Course	Final Registration	Final Program	Completion
Record Number	Record Number	Record Number	Record Number	Record Number	Record Number	Record Number
Enrollment Year	Enrollment Year	Enrollment Year	Enrollment Year	Enrollment Year	Enrollment Year	Student Completion Year
Enrollment Term	Enrollment Term	Enrollment Term	Enrollment Term	Enrollment Term	Enrollment Term	Student Completion Term
Institution ID	Institution ID	Institution ID	Institution ID	Institution ID	Institution ID	Institution ID
Course Provider Campus ID	Student ID (Institution)	Student ID (Institution)	Course Provider Campus ID	Course Provider Campus ID	Program ID	Student Completion Campus ID
Enrollment Term System	Student Type	Student Last Name	Course ID	Student ID (Institution)	Program Concentration ID	Student ID (Institution)
Enrollment Term Start Date	Student Running Start Affiliation	Student First Name	Course Section ID	Course ID	Program Degree/Certificate Level	Student Completion First Major: Program ID
Enrollment Term End Date	Student County of Origin at Last Admission	Student Middle Name	Course Number	Course Section ID	Program Degree/Certificate Level	Student Completion First Major: Program Concentration ID
Enrollment Term Census Date	Student State of Origin at Last Admission	Student Name Suffix	Course Title	Course Section Registration Sequence	Program Degree/Certificate Level	Student Completion Second Major
	Student Nation of Citizenship at Last Admission	Student SSN	Course Subject	Course Section Repeat Course Indicator	Program Completion Credits Required	Student Completion First Minor
	Student Co-Enrolled Indicator	Student Birth Date	Course Subject CIP Code	Course Section Registration State Funding Source	Program Field of Study	Student Completion Second Minor
	Student K-12 State ID	Student Sex	Course Section Instructional Type	Course Section Credit Hours Attempted	Program Field of Study CIP Code	Student Teaching Certification ID
	Student High School Code	Student Race 1	Course Section Duration	Course Section Credit Hours Earned	Program Field of Study Institutional Code	Student Completion Non-Institutional Credits Earned
	Student High School Completion Type	Student Race 2	Course Section Instruction Delivery Type	Course Section Grade Letter	Program Concentration	Student Completion Institutional Credits Earned
	Student High School Completion Year	Student Race 3	Course Section Instruction Delivery Site	Course Section Remedial Learning Registration Type	Program Concentration CIP Code	Student Post-Baccalaureate Degree Indicator
	Student High School Year Last Attended	Student Race 4	Course Section Online Learning Type	Course Section Grade Number	Program Concentration Institutional Code	
	Student High School GPA	Student Race 5	Course Section Remedial Learning Indicator			
	Student Previous Institution Code	Student Hispanic Identity 1	Course Section Start Date			
	Student Previous Institution Last Year Attended	Student Hispanic Identity 2	Course Section End Date			
	Student Previous Institution GPA	Student Hispanic Identity 3	Course Section Variable Dates Indicator			
	Student Previous Institution Degree Level	Student U.S. Immigration Status	Course Section Administrative Unit			
	Student Previous Institution Degree Acronym	Student WA Residency Status				
	Baccalaureate	Student Primary				

	Previous Credits Earned – Total	Enrollment Campus ID				
	Baccalaureate Previous Credits Transferred – Total	Student Primary Enrollment Site				
	Baccalaureate Previous Credits Transferred -- AP	Baccalaureate Class Standing				
	Baccalaureate Previous Credits Transferred -- IB	Student First Major: Program ID				
	Student SAT Math Score	Student First Major: Program Concentration ID				
	Student SAT Critical Reading (Verbal) Score	Student Term GPA				
	Student SAT Writing Score	Student Cumulative Institutional GPA				
	Student ACT English Score	Student Cumulative Overall GPA				
	Student ACT Math Score	Student Military Status				
	Student ACT Reading Score	Student Military Federal Benefits Type				
	Student ACT Science Score	Student Tuition Fee Type				
	Student ACT Composite Score	Student Non-Resident Tuition Fee Exemption 1				
	Student ACT Writing Score	Student Non-Resident Tuition Fee Exemption 2				
	Student Admission Campus ID	Student Non-Resident Tuition Fee Exemption 3				
	Student Admit Year	Student Tuition Fee Waiver 1				
	Student Admit Term	Student Tuition Fee Waiver 2				
	Student Previous Institution Degree DTA/AST Status	Student Tuition Fee Waiver 3				
	Student SAT Date Taken	Student Self-Reported Disability Status				
	Student SAT Math Section Score	Student Pell Grant Status				
	Student SAT Evidence Based Reading and Writing Section Score	Student State Need Grant Status				
	Student SAT Math Subsection Score					



	Student SAT Reading Subsection Score					
	Student SAT Writing and Language Subsection Score					