# Integrated Data Systems: Connecting Education Data to Local Communities

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# Logistics

- Phone lines muted

- Use the Chat or Q&A Box

- Webinar will be posted to the PTAC website a few weeks after this webinar is complete

# PTAC Guidance Document

This webinar is a high-level overview of PTAC's recent guidance:

Integrated Data Systems and Student Privacy

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# AGENDA

- Define integrated data systems (IDS)

- IDS example: Allegheny County

- FERPA and IDS

- Best practices for protecting student privacy

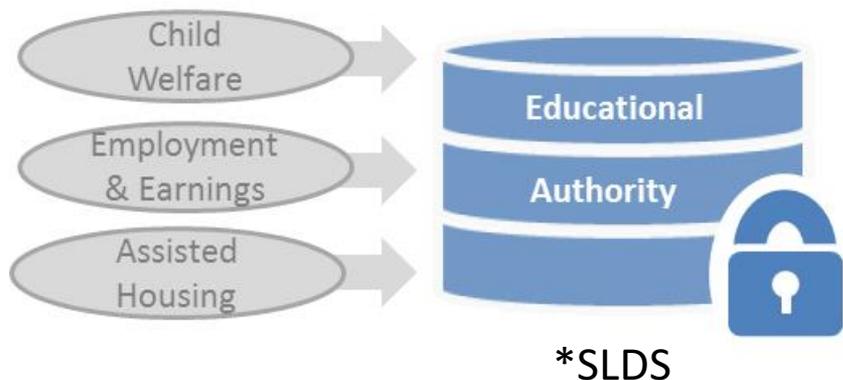- Deciding if an IDS is right for you

# INTEGRATED DATA SYSTEMS

Securely link administrative data across government agencies

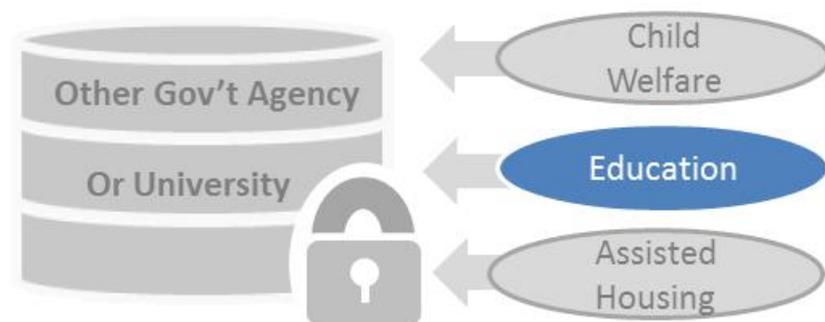United States Department of Education, Privacy Technical Assistance Center
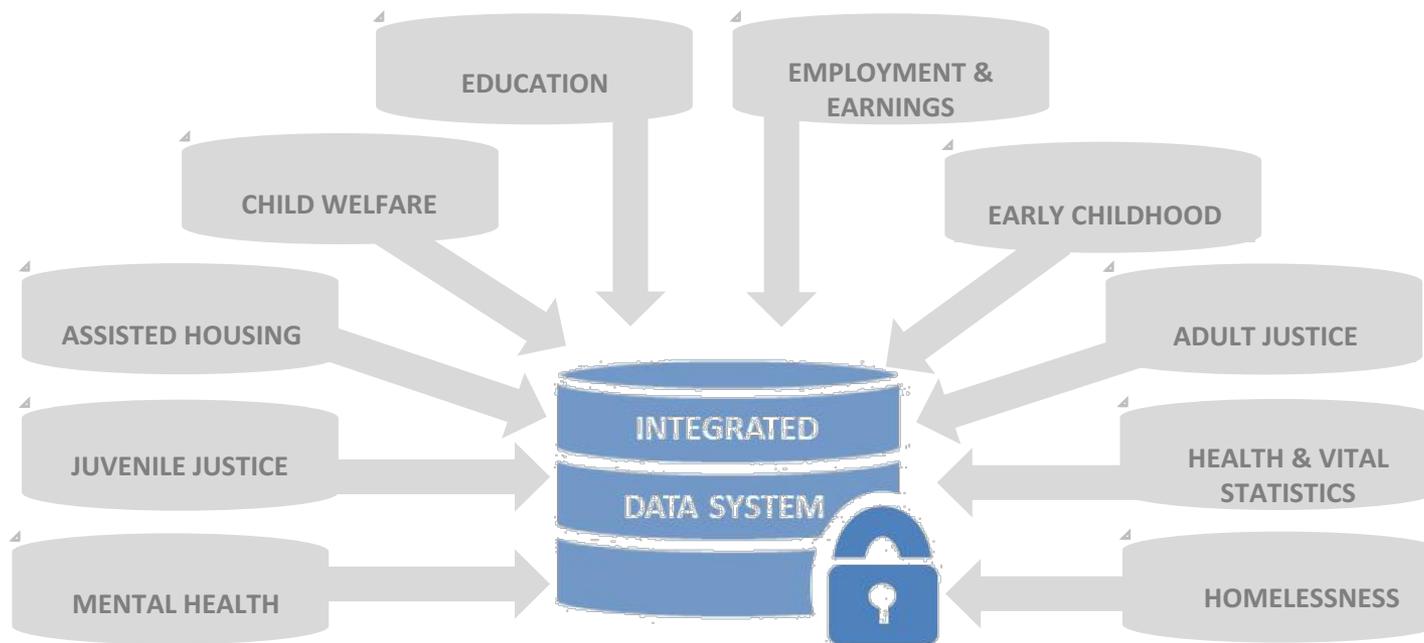
# INTEGRATED DATA SYSTEMS

In some cases, the IDS is hosted by an Educational Authority (internally or through a contracted provider)

In other cases, the educational agency or institution participates in an IDS hosted by another government agency or local university



*SLDS



Today's Focus

CROSS-AGENCY COLLABORATION

DOZENS OF CITIES AND COUNTIES AROUND THE COUNTRY ARE SETTING UP "INTEGRATED DATA SYSTEMS," IN WHICH SCHOOLS SHARE DATA WITH OTHER PUBLIC AGENCIES IN AN EFFORT TO IMPROVE EDUCATION AND SOCIAL SERVICES.

● Established local integrated data systems with full K-12 participation

■ Established state integrated data systems with full K-12 participation
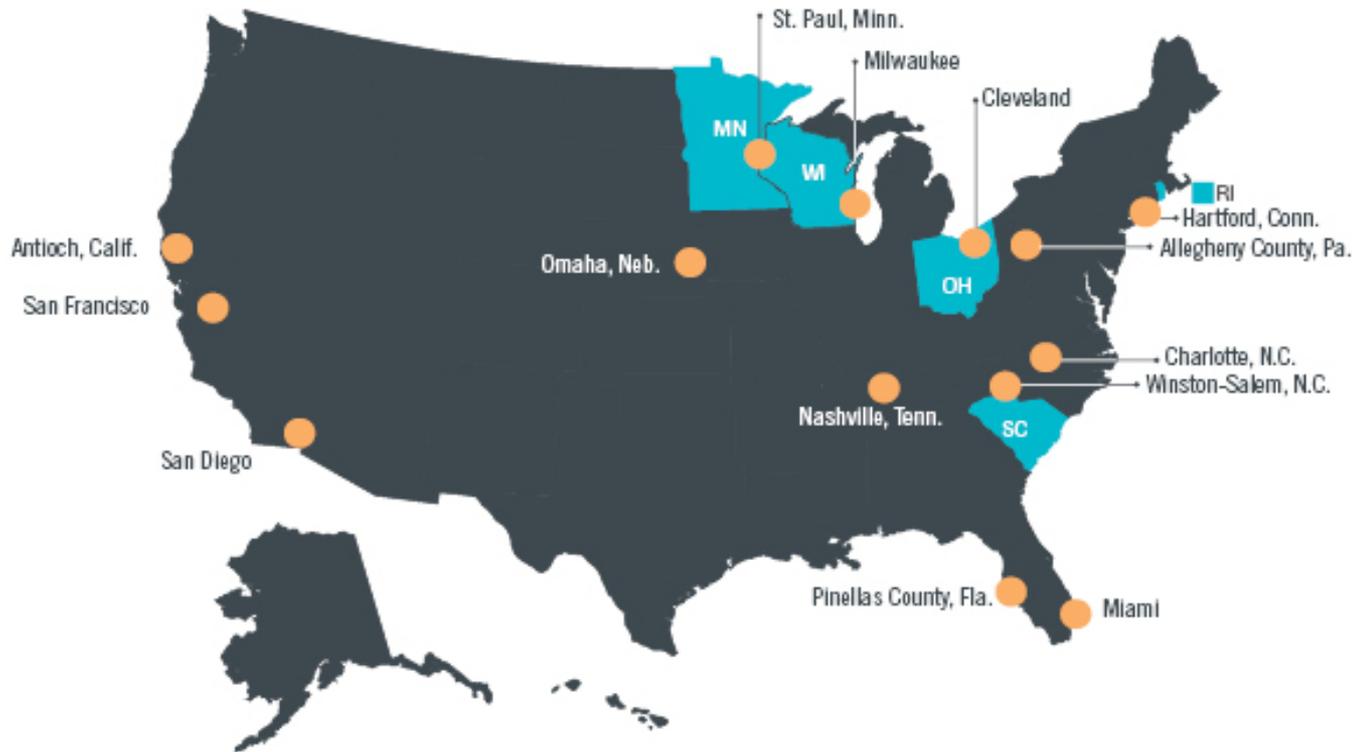
SOURCES: Ongoing survey by Actionable Intelligence for Social Policy, the Data Quality Campaign, the National League of Cities, and the National Neighborhood Indicators Project

EDUCATION WEEK

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# IDS EXAMPLE
## *Allegheny County Department of Human Services*

### Internal Sources

- Aging
- Child Welfare
- Community Service Block Grant
- Drug & Alcohol
- Early Intervention (partial)
- Family Support Centers
- HeadStart (partial)
- Homeless
- Housing Support
- Mental Health
- Intellectual Disabilities

### External Sources

- Allegheny County Housing Authority
- Allegheny County Jail
- Birth Records
- Allegheny County Medical Examiner's Office
- Department of Public Welfare
- Housing Authority City of Pittsburgh
- Physical Health Claims (Medicaid)
- Juvenile Probation
- Pittsburgh Public Schools + 17 additional County School Districts
- Pre-trial Services
- Adult/family court

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# ALLEGHENY COUNTY IDS
## *Education Partnerships*

### *Action Research Model*

Analysis ➤ Critical Reflection ➤ Action

- Predictive Analytics – Chronic Absenteeism

- Improving school stability – Best Interest Placement Tool, decision support tool used when caseworkers make placement decisions

- McKinney-Vento vs. HUD definitions of homelessness.  Exploring housing crisis prevention services for schools where families are often first identified.

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# ALLEGHENY COUNTY IDS
*Education Partnerships*

## Data Where It's Needed: *Up-to-date education information (where legal)*

### Child Welfare Case Management System



### Weekly Email Alert to Caseworkers (Pilot)

**SUMMARY OF EDUCATION CONCERNS**

| Case ID | Client ID | Client Name | School Attended | School Contact | IEP | Attendance | Suspension | Withdrawal |
|---|---|---|---|---|---|---|---|---|
| 1111 | 11111 | Client 1 | Pittsburgh Public - Schiller | 412-555-5555 | Y | X | | |
| 2222 | 22222 | Client 2 | Clairton - Middle School | 412-555-5555 | N | X | | |
| 3333 | 33333 | Client 3 | Pittsburgh Public - Carrick | 412-555-5555 | N | X | X | |
| 4444 | 44444 | Client 4 | Pittsburgh Public - King | 412-555-5555 | N | | | X |

**DETAILS**

**ATTENDANCE**

| Client Name | Days Absent | | | Tardies | |
|---|---|---|---|---|---|
| | Days Missed in Prior Week | Days Missed this Academic Year | Attendance Category | Days Tardy in Prior Week | Days Tardy This Academic Year |
| Client 1 | 1 | 27 | Chronic | 5 | 22 |
| Client 2 | 5 | 9 | At-Risk | 7 | 11 |
| Client 3 | 4 | 45 | Severely Chronic | 5 | 12 |

**SUSPENSIONS**

| Client Name | Days Suspended in Prior Week | Days Suspended This Academic Year |
|---|---|---|
| Client 3 | 4 | 16 |

**WITHDRAWALS**

| Client Name | Date of Withdrawal | Reason for Withdrawal | Date of Enrollment | New School |
|---|---|---|---|---|
| Client 4 | 12/20/2015 | Left District | | |

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# FERPA REFRESHER
## Elements relevant in the IDS context

- Personally Identifiable Information (PII)

- Consent

- Exceptions to Consent

  - School Official

  - Audit & Evaluation

  - Studies

- Disclosure of PII vs. De-identified Data

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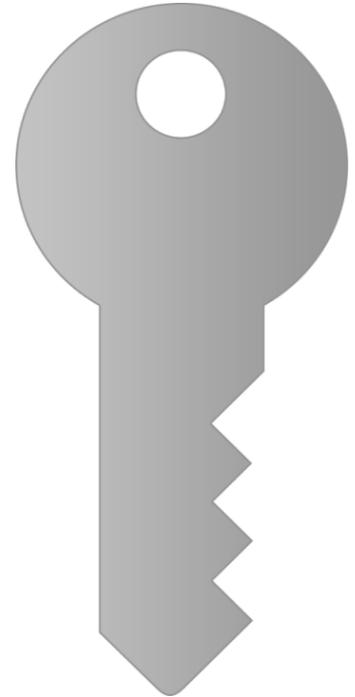
STAGE I

**Becoming an IDS Partner: Establishing a Data Governance Framework and Integrating Education Data into the IDS**

Unless an educational authority intends to operate the IDS, participation in an IDS requires disclosure of PII from students' education records to the third party that will be hosting and operating the IDS (IDS Lead). To be permissible under FERPA, this disclosure must be made with the written consent of the parent or eligible student or it must satisfy one of FERPA's exceptions to the requirement for written consent. All educational authorities may explore the audit and evaluation exception to consent to participate. If the educational authority is a school district, it may also explore the school official exception to consent to participate.

STAGE 2

**Approving the Use of Integrated Data: Reviewing Research Requests for FERPA Compliance and Releasing the Results of those Analyses**

Once education data are integrated with the IDS, each prospective use of any integrated data containing PII from education records should be reviewed, within the context of the IDS data governance framework, for compliance with FERPA and other applicable federal and state confidentiality and privacy provisions and adherence to established best practices. A key distinction in approving the release of the results of analyses using integrated data is whether they will be released in a de-identified or identifiable format.
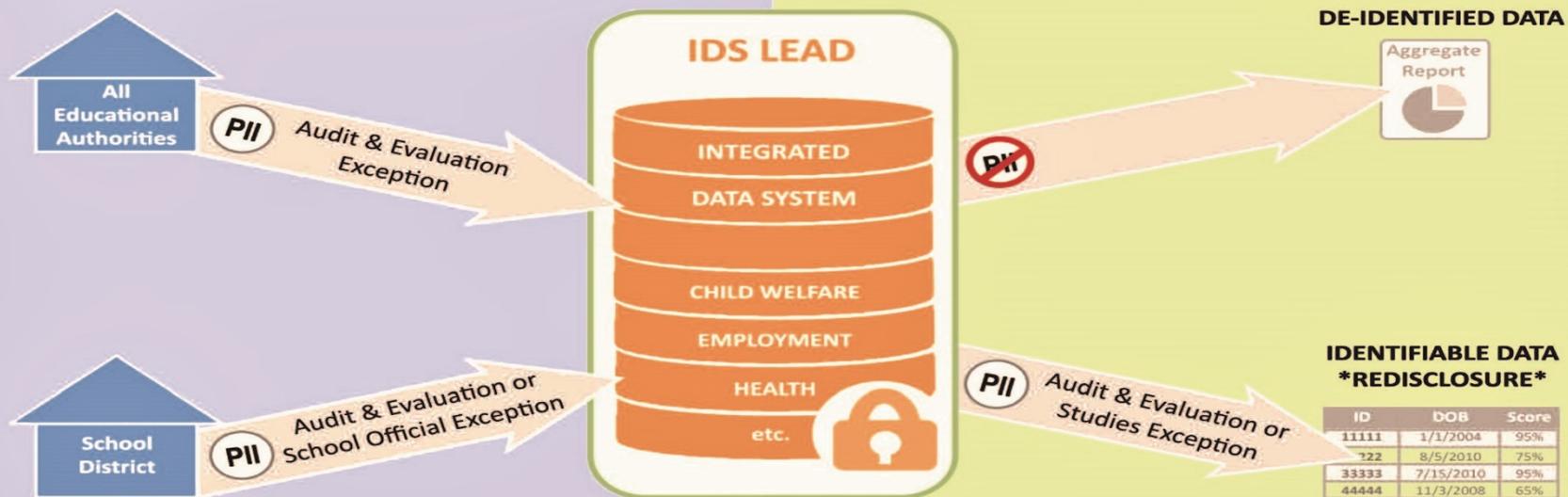
# A FEW THINGS TO NOTE…

**Data warehouse vs. fully federated IDS models**

*Fully Federated IDS model (not the subject of today's discussion)*

- *Participating agencies maintain data in their source systems*
- *Data are only accessed to fulfill a specific, approved request. No PII is stored in the IDS*
- *Stage 2 is most relevant, approving project specific requests for integrated data. Note recordation requirements still apply.*

**Other privacy laws may apply**

We're focusing on FERPA – but other federal and state laws may apply to the PII from education records in an IDS as well as other linked data.

## DEFINITIONS

IDS Lead: The entity hosting the IDS, managing data integration and access controls

Education Partner: The educational agency or institution participating in the IDS

# What does it mean to participate/become an IDS partner?

– Send data to IDS on a regular basis (yearly, quarterly, monthly, weekly, daily, etc.)

– IDS Lead has ongoing access to PII from education records

– Openness to participate in cross-agency research and evaluation projects (must be approved)

## Two FERPA Exceptions to Consent to Explore

Audit & Evaluation Exception
*(School Districts, Local and State Ed. Authorities)*

School Official Exception
*(School Districts)*

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# AUDIT AND EVALUATION EXCEPTION

Allows a School District, Local or State Educational Authority to share PII from education records without consent with their "authorized representatives"

Data can only be shared in order to
- Audit or evaluate a Federal- or State-supported education program, or
- Enforce or comply with Federal legal requirements that relate to those education programs

Stage 1 IDS Purpose:
To facilitate future audits and evaluations of Federally- or State supported education programs by establishing linked data.

# SCHOOL OFFICIAL EXCEPTION

School Districts may disclose education records to a third party if the third party:

– Performs a service/function for the school/district for which it would otherwise use its own employees

– Is under the direct control of the school/district with regard to the use/maintenance of the education records

– Uses education data in a manner consistent with the definition of the "school official with a legitimate educational interest," specified in the school/LEA's annual notification of rights under FERPA

– Does not re-disclose the PII except under the direction of the school and as permitted by FERPA

IDS Purpose:
IDS Lead may perform, for the district, the function of creating an integrated data infrastructure including linking education data with other IDS data sources, maintaining security, and controlling access to the data.

## Various Stakeholders May Request Information

– Government Agencies
– Research Institutions
– Public
– Service Providers

## IDS Lead plays a central role in accessing/analyzing data

Key distinction….what type of data is being released to stakeholders?

| De-identified Data | Identifiable Data |
| --- | --- |
| *(Aggregate/Summary or Individual Level Records)* | |

# DE-IDENTIFIED DATA

Sharing de-identified data is not considered a disclosure under FERPA

- de-identify the data by removing all direct <u>and indirect</u> identifiers;

- as needed, perform statistical methods to reduce the risk of reidentification, including:
  - aggregation
  - suppression
  - blurring, or
  - perturbation; and

- Perform a disclosure avoidance analysis on the resulting file to determine that it meets FERPA's standards for reidentification

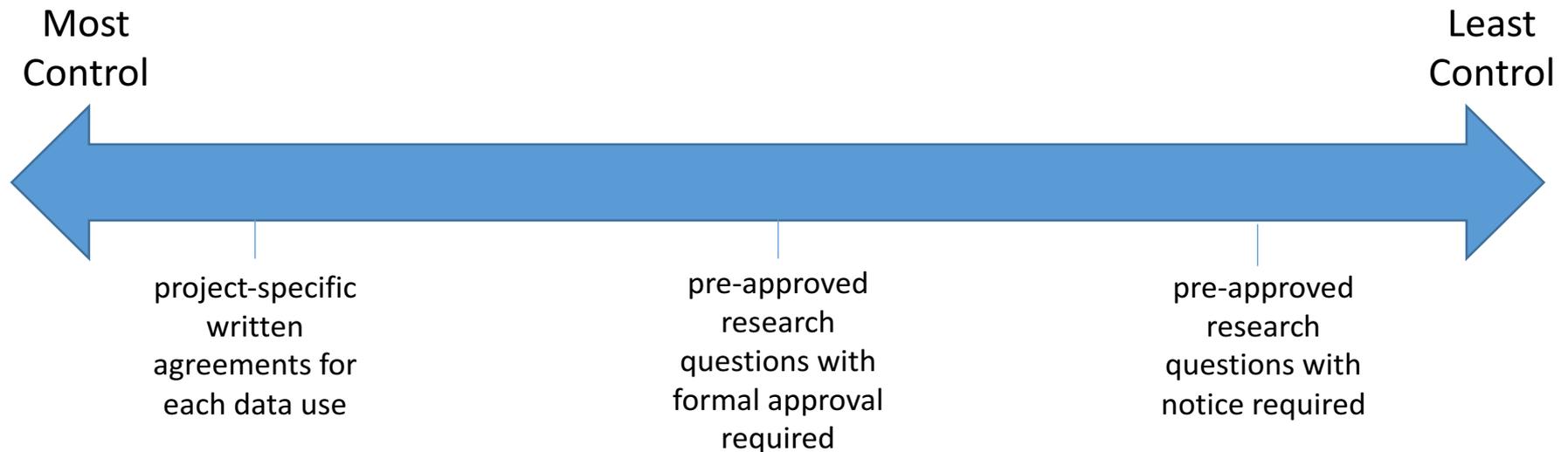United States Department of Education, Privacy Technical Assistance Center

# IDENTIFIABLE DATA

The IDS Lead may only re-disclose PII from education records to an external entity in limited situations **when the project falls under the audit and evaluation or studies exception** and all criteria to comply are met.

– May require an additional written agreement

– In most cases, the written agreements will be with the educational entity disclosing data to the IDS Lead and the external entity requesting data, with the IDS Lead named as the party to re-disclose the data.

# GOVERNANCE

Regardless of whether the method to share data is identifiable or not, the IDS Lead <u>may only</u> access data for the uses permitted in the legal framework the Education Partner established with the IDS Lead to become an IDS partner

Most
Control

Least
Control

project-specific
written
agreements for
each data use

pre-approved
research
questions with
formal approval
required

pre-approved
research
questions with
notice required

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# A NOTE ON USING IDS DATA FOR DIRECT SERVICE…

- In most cases, the exceptions used to operate an IDS will not permit use of these data for direct service.

- Direct service workers <u>may</u> be able to access PII from education records through the IDS with prior written consent or legal authority to access records without consent (for example, Uninterrupted Scholars Act).

# QUESTIONS ABOUT THE LEGAL FRAMEWORK?



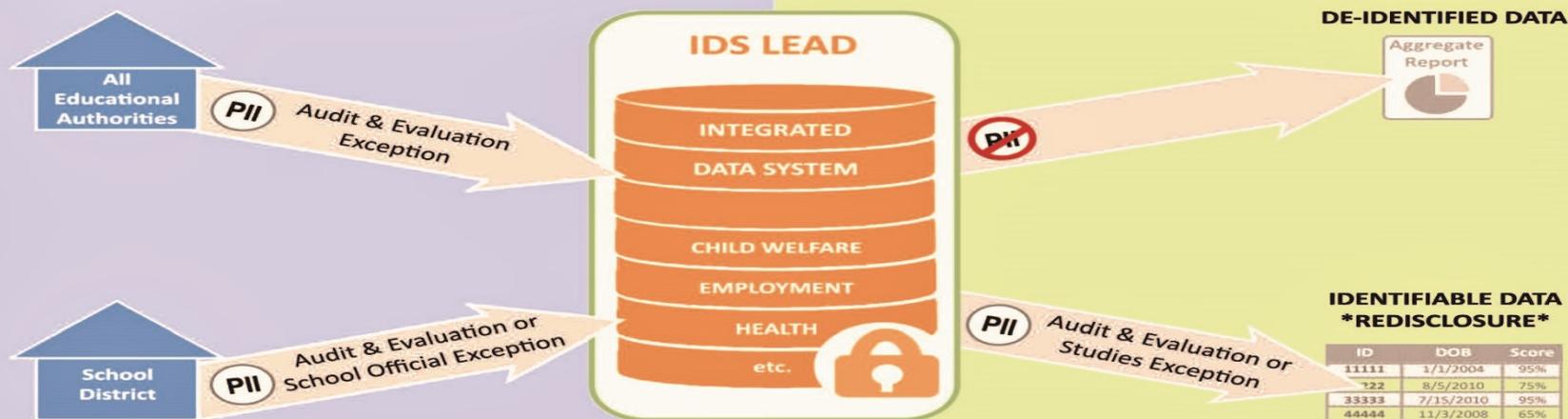United States Department of Education, Privacy Technical Assistance Center

# BEST PRACTICES
*Transparency*

✓ Be open about what data you are collecting and linking

✓ Explain (in layman's terms) what research and analysis you are doing (and why!)

✓ Publish (and advertise) the strength of your data governance and information security practices

✓ Use a multi-layered communication strategy

✓ Value! Value! Value! (Explain what's in it for the parents/children)

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# BEST PRACTICES
## *Governance and Information Security*

| | |
|---|---|
| Decision-making authority | Data Quality |
| Standard Policies and Procedures | Data Access Control |
| Data Inventorying | Recordation |
| Data Records Management | Data Security and Risk |

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# DECIDING IF AN IDS IS RIGHT FOR YOU



IT & Data Governance Costs
Privacy Challenges

Potential Benefits

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# Resources

- *Case Study #5: Minimizing Access to PII: Best Practices for Access Controls and Disclosure Avoidance Techniques*, U.S. Department of Education (2012): https://studentprivacy.ed.gov/resources/case-study-5-minimizing-pii-access

- *Centralized vs. Federated: State Approaches to Pn   20W Data System,* NCES (2012): http://nces.ed.gov/programs/slds/pdf/federated_centralized_print.pdf

- *Checklist: Data Governance*, PTAC (2011): https://studentprivacy.ed.gov/resources/checklist-data-governance

- *Checklist: Data Security,* PTAC (2011): https://studentprivacy.ed.gov/resources/data-security-checklist

- *Checklist: Data Sharing Agreement*, PTAC (2012): https://studentprivacy.ed.gov/resources/written-agreement-checklist

- *Data Governance and Stewardship*, PTAC (2011): https://studentprivacy.ed.gov/resources/issue-brief-data-governance-and-stewardship

- *Data Security: Top Threats to Data Protection*, PTAC (2011): https://studentprivacy.ed.gov/resources/issue-brief-data-security-top-threats-data-protection

- *Data Stewardship: Managing Personally Identifiable Information in Student Education Records* (NCES 2011S  602): http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2011602

- *FERPA Exceptions Summary*, PTAC (2014): https://studentprivacy.ed.gov/resources/ferpa-exceptions-summary-apr-2014-standard-size

- *Guidance for Reasonable Methods and Written Agreements*, Family Policy Compliance Office (2011): https://studentprivacy.ed.gov/resources/guidance-reasonable-methods-and-written-agreements

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