

California Cradle-to-Career Workgroup Meeting Summary

June 30, 2020

The California Cradle-to-Career Data System Workgroup, which is comprised of partner entities named in the authorizing legislation, provides recommendations to the Governor's Office regarding data system development.

This document provides a summary of the key points that emerged from substantive discussion over the course of the June 2020 workgroup meeting. More information about the meeting, including support materials, a recording of the meeting, and the PowerPoint, are available at <https://cadatasystem.wested.org/meeting-information/workgroup> (click on "Meeting Materials").

The following workgroup representatives attended the meeting:

Thomas Vu, Association of Independent California Colleges & Universities; Freshta Rasoli, Bureau for Private Postsecondary Education; Ben Allen, Cindy Kazanis, Sarah Neville-Morgan, and Jerry Winkler, California Department of Education; Akhtar Khan, California Department of Social Services; Brenda Bridges Cruz, California Department of Technology; Elaine Scordakis, California Health and Human Services; Jeanne Wolfe, California Labor and Workforce Development Agency; Amy Fong, California School Information Services; Ed Sullivan, California State University, Office of the Chancellor; Patrick Perry, California Student Aid Commission; Barney Gomez and Imran Majid, California Community College Chancellor's Office; Sara Pietrowski, California State Board of Education; Michele Perault, Commission on Teacher Credentialing; Amy Faulkner, Employment Development Department; Joy Bonaguro, Government Operations Agency; Chris Furgieuele, University of California, Office of the President; and Ben Chida, Governor's Office.

Public Comment

Anna Alvarado of the California EDGE Coalition spoke in support of creating tool set for adult learners and including data on apprenticeships.

Rigel Spencer Massaro of Public Advocates outlined the importance of meaningful stakeholder engagement and of addressing structural racism in the state data system design.

Vision, Mission, and Strategic Objectives

Ed Sullivan of CSU described the process used by several workgroup members to refine the vision, mission, and strategic objectives. The full workgroup then discussed the language and made edits to the vision statement to integrate skills training information and to the strategic objectives to highlight that data sets should be intersegmental and that the equity focus should examine gaps in opportunity as well as outcomes. The final statements read:

Vision

The Cradle-to-Career Data System connects individuals and organizations with trusted information and resources. It provides insights into critical milestones in the pipeline from early care to K–12 to higher education, skills training, and employment. It empowers individuals to reach their full potential and fosters evidence-based decision-making to help California build a more equitable future.

Mission

To be California's source of actionable data and research on education, economic, and health outcomes for individuals, families, and communities; to expand access to tools and services to navigate the education to employment pipeline.

Strategic Objectives

- Develop the architecture for linking records across agencies and creating intersegmental data sets
- Provide public-facing data visualizations, query tools, and a research library that provide actionable information on education, social services, employment patterns, and equity gaps in opportunities and outcomes
- Provide inter-agency data sets that enable research on factors that help Californians meet critical education milestones, evaluate the long-term impact of state-funded programs, and identify strategies for closing equity gaps
- Provide resources, training, and technical assistance that build data literacy among policymakers, practitioners, and the public
- Provide college and career planning tools, college-readiness monitoring, electronic transcripts, and confirmation of eligibility for financial aid and student supports
- Lead efforts to ensure the reliability of data contributed by the partner entities

VOTE: All three statements were unanimously approved by the partner entities present at the meeting.

Technical and Legal Framework

The facilitation team walked through a proposed technical and legal framework for the state data system, based on the use cases approved by the workgroup and the recommendations of the various subcommittees.

After a discussion about technical considerations, workgroup members recommended that the Technical and Security Subcommittee explore the following questions:

- Could data be kept in a single technical system and use permissions to segregate data elements, as opposed to creating separate cloud-based repositories?
- Could the deidentified data files created in the system be maintained and added to over time, rather than creating multiple, stand-alone copies of the linked data sets?
- Could the system use a secure data enclave rather than relying on downloads and cutting files for data requests?
- Could the system use synthetic data for the partner data set?
- How could the workload for the partner entities be minimized so as not to create an undue burden related to uploading information to the cloud?

In addition, the workgroup requested that the facilitation team develop a visual that shows how data would flow into and through the system.

One workgroup member requested that protections be created for personally identifiable information in the case of Public Record Act (PRA) requests and that a formal policy for deidentification be developed. The Legal Subcommittee will include a provision related to PRA requests in draft legislation that will be

provided for the September workgroup meeting and will provide a draft deidentification policy for vote at the December workgroup meeting.

Some workgroup members were worried that the proposed approach would not adequately support the research goals for the data system, because it makes provision of data optional, beyond elements needed for person matching and the P20W data set. Others noted that it might be preferable to expand the number of deidentified data sets beyond the P20W data set and the partner research data set, with some requirements for the partner entities to provide the associated data elements. Having a set of curated data sets could make it easier to fulfil research requests. Another workgroup member noted the importance of providing sufficient funding for staffing to ensure that data can be uploaded, even at the minimum level of once per year.

Two workgroup members noted that, in addition to the partner entities, the educational institutions providing the source data should have access to deidentified unitary data. They requested that a potential legal and technical framework for this access be identified.

Another workgroup member stressed the importance of including an Institutional Review Board (IRB) and creating accountability for third parties requesting data, with assurances that data requests do not provide blanket approval for unspecified, ongoing research. These concerns were referred to: 1) a homework team that will develop a draft Data Request Process for the July workgroup meeting, and 2) the Research Agenda Subcommittee to develop a proposal for an IRB and a disclosure review board for the August workgroup meeting.

One member recommended that a third-party legal agreement template be created to streamline research requests. This will be taken up by the Legal Subcommittee, which will prepare a draft agreement for the September workgroup meeting.

Finally, the facilitators clarified that the data system would flag, rather than exclude, European Union citizens, per a recommendation from the Legal Subcommittee.

VOTE: The partner entities present at the meeting unanimously agreed to proceed with developing technical and legal documents based on the proposed technical and legal framework, with the following amendments:

- Develop a governance process to expand the number of data sets over time beyond the P20W data set and the partner research data set, with some requirements for participation that is consistent with law
- Explore whether data could be kept in a single technical system and use permission and logical separation to segregate data elements
- Explore how individual education institutions could access data sets, in addition to partner entities
- Explore the creation of a secure data enclave rather than cutting files for data requests
- Flag, rather than exclude, European Union citizens
- Ensure there is an IRB process and accountability for third parties requesting data, and that data requests do not provide blanket approval
- Explore synthetic data sets

Managing Entity

The facilitator briefly reviewed the four options outlined in the background paper. Elaine Scordakis of CHHS put forward a proposal that her agency's Research Data Hub serve as the managing entity and provided a high-level overview of the system features.

The workgroup broke into small groups to discuss the five possible models for a managing entity. The notes below summarize both the small group and full group discussion on each model.

New State Agency: This model has the advantage of leveraging well-understood and trusted state processes that ensure no one partner entity has a greater say in the process. The group noted that while the history with the California Postsecondary Education Commission makes this option feel at greater risk of being defunded, the state's current financial crisis means that all funding mechanisms are vulnerable. Also, standing up a state entity may be more cost effective than using an outside entity. Some workgroup members expressed concern that the state would not be able to recruit the necessary talent to manage the system within the state salary structure. The group also noted that leveraging current state resources and planforms could provide efficiencies.

Partner Entity: This model would streamline the contracting process and build on existing experience. However, putting one entity in charge could lead to competing priorities over time, whether for funding or for the focus of the data system.

Joint Powers Authority (JPA): This model would fit well with the governance structure, because it allows the partner entities to oversee the data system and add other, non-state entities into the JPA. Funding would flow through the partner entities to the JPA. It would also allow the CHHS Research Data Hub to be easily integrated. One workgroup member noted it would be important to set rules such that the JPA could not compete with a partner entity for funding. Another workgroup member was concerned that a JPA may not be the desired approach for the Governor's Office because it weights control toward the partner entities. Finally, for historical context, a workgroup member noted that a JPA was the preferred model in 2011 and was authorized by the legislature, but this may have been because it was the only viable option at the time.

Nonprofit Auxiliary: This approach would offer a high degree of flexibility, particularly in arenas like hiring, contracting, and adjusting workflows to address new priorities, while still working under state oversight. It offers many of the benefits of a public-private partnership with less organizational complexity. However, this approach could lead to a perception that the host entity has greater authority over the state data system, due the parent/child relationship with an auxiliary.

Public-Private Partnerships: This model is being used in other states, which could provide the workgroup with a deeper understanding of the pros and cons of this option, particularly regarding how a private entity would be integrated into the governance structure. Like the nonprofit auxiliary option, a public-private partnership would allow for greater flexibility in hiring and contracting. California might also be able to leverage an in-kind donation from a private partner. However, the arrangement with a private party would need to be negotiated frequently, which could be complex given the need to coordinate with all of the partner entities. This option might be good in combination with one of the other approaches.

While some members questioned using a nonprofit auxiliary or a JPA, the workgroup felt they needed more information before moving forward to a vote on the type of managing entity. Several expressed a desire to develop a hybrid solution that combines different features of the five proposed approaches. One member brainstormed a potential list of criteria that could be used to evaluate options, including: adaptability, administrative simplicity, cost effectiveness, durability, hiring flexibility, independence, neutrality, and oversight.

Another suggested that it would be important to identify the core characteristics for the managing entity. The facilitators provided the following list, which reflects the legal and technical framework approved by the workgroup earlier in the meeting:

- 1) Managing the technical infrastructure
 - overseeing a master data management model to match individual records
 - creating data sets that are tailored to specific purposes
 - leveraging a role-based technical architecture to allow authorized parties to access specific de-identified, unitary data points
- 2) Supporting data requests
 - supporting a review process for data requests from third parties
- 3) Implementing public tools
 - providing information to the public using dashboards, query builders, and research libraries
 - scaling existing tools that support college planning and the transfer of student records
 - providing resources, training, and technical assistance

Several workgroup members noted that the managing entity should not be responsible for conducting its own research, as a way to remain neutral. Instead, it should focus on provisioning data to others and supporting data use.

The facilitators underscored the importance of recommending the type of managing entity before the end of July, as work cannot proceed on the governance, legal, or technical requirements without this decision being made. Therefore, the workgroup agreed to appoint delegates from each partner entity to attend two additional meetings in July to develop a proposal for the July 30 meeting, and to add another workgroup meeting on August 31 to finalize the governance committee recommendation. These meetings will be open to the public under Bagley-Keene guidelines. After the workgroup meeting, the following dates and times were set for the July meetings: July 9, 10:00-12:00 and July 16, 11:00-12:30.

Finally, Ben Chida of the Governor's Office spoke briefly. He thanked the group for its ongoing progress in spelling out the requirements of the system and encouraged them to weigh the realities of the various managing entity models, without indicating a strong preference for any of the potential approaches.

Role of AICCU

Tom Vu of AICCU clarified that his organization, while listed as a partner entity in the California Cradle-to-Career Data System Act, is not a state agency. It is a nonprofit representing 85 independent colleges and does not maintain a single data set with member information. Therefore, the workgroup will need to determine how AICCU would be included in the governance structure and how data from independent colleges can be loaded into the Cradle-to-Career system.

Baron Rodriguez from WestEd, who is an expert on state data systems, clarified that other states had been unsuccessful in passing legislation to make nonprofits like AICCU an official state education authority, and instead the most viable route is to have each independent college sign a legal agreement with AICCU to represent their interests in the state data system. Some workgroup members expressed concern that independent colleges would not elect to contribute their information to the data system, which would constrain the insights available from the system. One suggested that receiving CalGrants funds could be made contingent on contributing to the state data system.

The group agreed that the best route forward was to have Tom Vu discussion options with AICCU's membership and bring recommendations back for the August workgroup meeting.

Inclusion of Additional Partner Entities

Baron Rodriguez of WestEd noted that, in other states, the governance process includes a mechanism to expand the number of partner entities, including the following steps:

- Review alignment of data needs and identify reason for inclusion, including which data elements would be shared
- Refer the request to a legal team to address issues such as privacy considerations
- Determine how the entity would be integrated into the governing board
- Develop technical strategy for integrating data

In California, in addition to including other state agencies such as the Department of Motor Vehicles or the Department of Justice, the Cradle-to-Career system could be expanded to include regional data trusts.

The group recommended that, when the Legal Subcommittee works on adapting the Interagency Data Exchange Agreement for the state data system, it also address whether this mechanism is sufficient for adding new partners that are state agencies. Proposed language for IDEA will be presented at the October workgroup meeting.

One workgroup member expressed discomfort with allowing non-state agencies to join the governance structure, and others concurred. The group recommended that entities like regional data trusts be referred to the data request process. The policy could be amended in the future if there is a compelling use case.

Community Engagement

The facilitation team provided a brief update on an effort led by workgroup members, advisory group members, and Collaborative Communications to create a community engagement campaign for the fall. A proposal for the engagement campaign will be brought to the July workgroup meeting.

Master Data Management Request for Information (RFI)

The facilitation team noted that the RFI for the technology solution to match records was released on June 8. Responses to questions from prospective respondents will be posted by the California Department of Technology later in the week. The deadline for responding has been extended to July 30. A small team is working on creating a rubric for assessing responses, made up of partner entities that are not planning to submit a response. The Common Identifier and Technology & Security

Subcommittees will meet on September 1 to craft a proposal for how to approach person matching, based on responses received, for the September workgroup meeting.