Cradle-to-Career Data System Data Request Process

Data Access Options

No request needed: All information in the query builder would be accessed without a data request or signing a legal agreement. *Timeframe: immediate access*

Expedited process: Requests for properly deidentified aggregate data that is not available through the query builder would require that a data request form be filled out, reviewed by the Managing Entity, and approved by the data providers. Data provided through the expedited process does not require a legal agreement. *Time frame goal: one month from request to receiving data, although time frames may need to be adjusted based on the volume of requests.*

Comprehensive process: Requests for unitary data or to match a cohort of individuals against Cradle-to-Career data would require a comprehensive review. The requestor would fill out a data request form; the request would be reviewed by the Managing Entity; the request would be evaluated by the data providers and the Commission for the Protection of Human Subjects; the requestor would sign a legal agreement and provide proof of research training; analytical outputs would be reviewed to ensure data privacy; and data providers would review any reports submitted for inclusion in the Cradle-to-Career Research Library. *Time frame goal: three months from the request being submitted to the data provider(s) to a decision on the request, although time frames may need to be adjusted based on the volume of requests.*

Available Data

A list of available data points would be provided on the Cradle-to-Career website.

In phase one, for the primary providers to the P20W Data Set, the only data points available through the data request process would be from the P20W Data Set (Bureau of Private Postsecondary Education, California Community Colleges Chancellor's Office, California Department of Education, California State University, California Student Aid Commission, Employment Development Department, University of California, and independent colleges).

Other governing board members may make data points available through the Cradle-to-Career data system in phase one (California Department of Social Services, California Health and Human Services Agency, California Labor and Workforce Development Agency, and Commission on Teacher Credentialing).

Responsibilities

Managing Entity

The Managing Entity would screen all requests to identify:

- If requested information is available through the query builder and communicate to the requestor how to access this publicly-available information without going through the request process
- Whether the request can be fulfilled with available data in the Cradle-to-Career data system, and if not, where the requestor might be able to access that information
- Whether the form is properly completed and if not, provide clear action items to the requestor regarding what needs to be modified
- Whether the purpose and content of the request is sufficiently clear, and if not, support the requestor to clarify the request
- Whether there are legal impediments to the request as written, and if so, work with the requestor to identify legally appropriate options
- Whether the expedited or comprehensive process should be used
- If another researcher has conducted a similar analysis using the Cradle-to-Career data system, and if so, alert the requestor to foster collaboration
- In cases where requests are for data from a single provider and that provider does not want to use the Cradle-to-Career data system to fulfil the request, communicate how to access information from that data provider

The Managing Entity will also create neutral, factual summaries to accompany requests that are ready for review by data providers. These summaries will identify factors such as the alignment of the request to the vision and mission of the data system, the likely impact of the research, and whether the topic is urgent or timely.

Data Providers

Data providers would review requests that have been forwarded by the Managing Entity and would act in good faith to approve requests. Data providers have the authority to approve or deny requests based on factors such as whether it would provide information for the public good, the appropriate data elements have been requested to address the approved research questions, and the request conforms with applicable state or federal laws, laws that are specific to data providers, or legal restrictions preventing access to data from that provider due to prior breach of contract or unethical conduct.

Continuous Improvement

After the first year of implementation, the data request process would be reviewed by the Data & Tools Advisory Board, with input from the Managing Entity and the data providers, to determine if the process could be improved. Each subsequent year, the Data & Tools Advisory Board would review the requests that were approved and denied to identify mechanisms would enable appropriate data requests to be fulfilled.

Legal Agreements

State Agency Access to Unitary Data

This includes data providers as well as other entities from the Executive, Legislative, and Judicial branches that have signed the Interagency Data Exchange Agreement (IDEA), such as Department of Finance and the Legislative Analyst's Office

- When seeking access to unitary data, IDEA signatories would complete a Business Use Case Proposal (BUCP). The BUCP must be signed by all parties providing data for the request, including specifying which data elements the data providers agree may be shared, before access would be granted to the requested data set in accordance with legal requirements.
- The Managing Entity would provide a secure environment in which the data providers could submit and access the data, or would provide a file, based on the delivery details specified in the approved BUCP.
- If a state agency is subcontracting with a third party to do work on its behalf, the subcontractor must sign a mutually acceptable data sharing agreement and/or a non-disclosure agreement with all data providers.

Individual Education Institutions, Social Service Providers Associated with Data Providers, and the Association of Independent California Colleges and Universities (AICCU)
This includes K-12 local education agencies, postsecondary institutions (including universities and colleges), and social service providers that report data to the California Health and Human Services Agency.

- Legal documents would be based on templates developed by the Legal Subcommittee, based on various Family Educational Rights and Privacy Act (FERPA) and Health Insurance Portability and Accountability Act (HIPAA) allowances.

Third Party Access
This includes research organizations, individual researchers within academic institutions, doctoral students, and members of the Governing and Advisory Boards that are not associated with organizations that are signatories to IDEA, and other parties not already specified.

- Legal documents would be based on templates developed by the Legal Subcommittee, based on various FERPA and HIPAA allowances.

Request Process

STEP ONE: The Governing Board informs the public about the Cradle-to-Career data system request process

The Governing Board approves the following policies and materials, which would be posted on the project website by the Managing Entity, including:

- Clear description of the three data access options
- Data elements that may be requested
- Which data providers allow for requests for information from that agency only, and which require that data must involve more than one data provider
- A downloadable list of the questions in the request form
- A policy regarding data use
- Tips on using the query builder to get data without having to go through the request process
- A link to the research library with tips on grounding requests in prior research
- A list of prior requests including who made the request, the project abstract, the status of request, and an explanation if the request was denied (such as: not allowable under law, information available through query builder tool, or requested data did not align with research questions)
- Contact information at the Managing Entity for support in determining whether a data request is needed
- Clarification that the Managing Entity cannot pull data without official approval through the request process

STEP TWO: The requestor completes a data system request

The website includes a branching online form that includes the prompts below. Before the form can be completed, the requestor must respond to a prompt that they have confirmed that they cannot obtain the information needed using the query builder tool.

1. Names and titles (with the ability to list multiple names/researchers)

2. Contact Information (for party requesting data and for other purposes such as billing)

3. Organization

4. Is this request on behalf of your employer, a data provider, or for an independent project?

5. Is this request for individual-level (unitary) data?

   - If no: proceed
   - If yes: Please describe in detail how you will use the data, including the methodology you will use to conduct the analysis

6. Which specific data elements are you requesting and for which years?

7. Do you intend to upload a cohort of individuals to match against approved data points?

   - If no: proceed

- If yes: How many individuals would be in the cohort and what data elements would you be providing to support matching individual records?

8. Briefly describe the project requiring this information (up to 100 words, this would be used for a public description of the purpose for providing the data).

9. If there is a reason that your request should not be made public, please describe why.

10. If you plan to publish your results, please describe the venue(s) in which the results might appear.

11. Please list the names, titles, and organizations of any individuals who would access the data.

12. Please list the entities funding this research study.

13. Please confirm that you understand the requirements for allowable use, non-disclosure, data destruction, and adherence to applicable regulations [statement with a check box to affirm]

[note: this form would be edited once the third-party legal agreement is finalized by the Legal Subcommittee to ensure all content necessary to fill in the legal template has been collected at the point of the initial request and with the Commission for the Protection of Human Subjects to streamline the institutional review board process.]

STEP THREE: The Managing Entity screens requests

The Managing Entity would review requests on a rolling basis and provide assistance to requestors in completing their request form. For requests that are ready for review by data providers, the Managing Entity would create a summary and prioritize the requests as follows:

- First priority: In the order received, requests from state agencies, AICCU, individual education institutions, and social service providers that pertain to their own students or clients
- Second priority: In the order received, all other requests for data from more than one entity
- Third priority: In the order received, all requests for data from a single entity

Requests would be forwarded to data providers once a week.

STEP FOUR: The contributing data providers review requests

Data providers would review requests, with the goal of approving all appropriate requests in good faith. If a data provider has questions about the request before making a determination, the Managing Entity would arrange a meeting or a written exchange between the relevant data provider and the requestor to address those issues, and as appropriate, amendments would be made to the request.

If substantive issues are identified that cannot be resolved, the requestor would be informed why the request cannot be fulfilled. The requestor could submit a new request that addresses these concerns.

STEP FIVE (Comprehensive Review Only): Research and legal authorization

The Managing Entity alerts the requestor that they have received provisional approval and supports the requestor in doing the following:

- securing Information Practices Act (IPA) review and Institutional Review Board (IRB) approval from the Committee for the Protection of Human Subjects
- documenting proof of research training such as from the Collaborative Institutional Training Initiative (CITI) Program
- executing the legal agreement with the requestor, data providers, and Managing Entity

STEP SIX: The Managing Entity provides the approved data

Expedited Process: For approved requests, the Managing Entity would construct the data file and provide it to the requestor.

Comprehensive Process: For requests that have a signed agreement, the Managing Entity would establish permissions in the secure data enclave that allows the requestor to access approved data elements and conduct the analysis. If the requestor is uploading data, the Managing Entity would match the records and produce a data set that can be accessed by the requestor in the secure data enclave. Or, in the case of state agencies, a data file may be produced in accordance with the approved BUCP.

STEP SEVEN (Comprehensive Review Only): Managing Entity provides ongoing project support

The Managing Entity would track any deadlines associated with the project and communicate with the parties to determine whether the project is on target or if an extension is needed on the legal agreement.

STEP EIGHT (Comprehensive Review Only): Experts conduct a review for privacy protections

Once the analysis is complete, the Managing Entity would coordinate with the data providers, as well as an expert in data disclosure relevant to the topic of the research, to review the output. This review would ensure information removed from the data system aligns with the terms of the signed agreement and does not violate privacy rules.

STEP NINE (Both Expedited and Comprehensive Review Processes): Data providers conduct a final review

Once the report is complete, the Managing Entity would follow up with requestors about contributing a report to the Cradle-to-Career Research Library. For those using the expedited request process, posting reports in the research library is optional. For those using the comprehensive process, requestors should plan for their report to be posted.

If the data provider has concerns about the analysis, they can recommend that the report not be posted in the Cradle-to-Career Research Library or request that the analysis include a statement regarding their concerns. The final review process would not preclude the requestor from publishing results in other venues, so long as the research falls within approved parameters and could not lead to re-identification of individuals in the data.