Cradle-to-Career Data System

Privacy Policy

Contents

[EFFECTIVE DATE]

GENERAL INFORMATION

What is the Cradle-to-Career Data System? What is its purpose?

The Cradle-to-Career Data System (Data System) is infrastructure established by Education Code Section 10852 to integrate data from partner entities to inform appropriate interventions and supports; create direct support tools for teachers, parents, advisors, and students; enable agencies to plan for and optimize educational, workforce, and health and human services programs; advance academic and governmental research on improving policies from birth through career; improve the quality and reliability of data reported; and identify other data points and metrics to support similar goals.

How does the Data System protect the privacy of individuals?

The Data System is committed to protecting confidential information. The Data System is governed by the partner entities who contribute data to the system, who ensure that personal data collected must be relevant to the purpose for which it is collected. The Data System has privacy policies and procedures that adhere to all applicable state and federal laws including, but not limited to the Family Educational Rights and Privacy Act (FERPA), the Health Insurance Portability and Accountability Act (HIPAA) and the California Information Practices Act. Its data security protocols follow strict state and federal standards and technology protocols. References to key federal and state statutes are provided in the Resources section.

DATA INTEGRATION

Who contributes data?

The Cradle-to-Career Data System does not collect data directly, but rather integrates and links individual-level data contributed from the following partner entities as specified in the Cradle-to-Career Data System legislation:

- Bureau for Private Postsecondary Education
- California Community College Chancellor's Office
- California Department of Education
- California Department of Health Care Services
- California Department of Social Services
- California Health and Human Services Agency
- California State University
- California Student Aid Commission
- Commission on Teacher Credentialing
- Employment Development Department
- Labor and Workforce Development Agency

- University of California
- Individual independent California colleges and universities

What data elements are contributed?

Each partner entity determines its own data contributions. The Data System integrates data from the partner entities, such as:

- Name and demographic information
- Information about different programs and institutions (e.g., early learning and care programs, K-12 local educational agency information, and postsecondary institution characteristics)
- Student enrollment and completion, program participation and outcomes
- Student assessment/test results
- College enrollment
- Financial aid
- Wage/employment information
- Participation in social services (CalWORKs, Cal Fresh, Medi-Cal, and foster youth services)

For a full list of data elements [INSERT LINK HERE]. Refer to the Data Dictionary [INSERT LINK].

How do I opt-out?

If you wish to delete your information from the Data System, you may complete an opt-out form. [INSERT LINK HERE] Note that the opt-out form deletes your information from the statewide Data System, not the data held by each of the submitting partner entities.

DATA SYSTEM

Who has access to the data system?

The Data System has three types of access:

- **Public Website** (dashboard and query tool): The information available from the Public Website is provided at an aggregate, fully-deidentified level.
- **Operational Tools** (College and career planning tools): This personally-identifiable information is password-protected and only available to students and their families and authorized personnel, such as teachers or counselors.
- **Analytical Data System** (secure data enclave): This anonymized data is only available to State agency and other authorized personnel, such as:

- o Authorized school administrators and teachers (allowed through FERPA and security-trained staff) and contractual IT personnel whose job duties require access.
- o Authorized personnel conducting program audits or evaluation studies (limited access).
- o Qualified researchers conducting research approved by the partner entity contributing the data in accordance with applicable law.

What keeps the system secure?

- [INSERT ONCE TECHNOLOGY INFRASTRUCTURE IS DETERMINED]

Where is the data stored?

- [INSERT ONCE TECHNOLOGY INFRASTRUCTURE IS DETERMINED]

For more details about the Data System

- Contact [INSERT CONTACT INFORMATION HERE]

DATA GOVERNANCE

The Cradle-to-Career Data System, managed and operated by the Government Operations Agency (GovOps), has clearly assigned responsibilities for the administration, oversight, implementation and monitoring of policies and processes that ensure data are only used or disclosed for proper purposes at every level of the system. Additionally, the Data System utilizes technical and physical safeguards to ensure compliance with California statutes.

Who ensures data safeguards

- GovOps (managing entity for the Cradle-to-Career Data System)
- Cradle-to-Career Data System Governing Board
- Data and Tools Advisory Board
- Cradle-to-Career Data System Privacy Officer
- Cradle-to-Career Data System Staff

For more details about DATA GOVERNANCE:

Refer to the rules of conduct for staff related to personal information [INSERT NAME OF DOCUMENT HERE].

ADDITIONAL RESOURCES

Who can I contact for more information?

Contact [Name], the privacy officer, at GovOps.

Statutes

- [California Education Code section 10850](#), the California law that establishes the Cradle-to-Career Data System and defines its responsibilities.
- [Health Insurance Portability and Accountability Act](#) (HIPAA)
- California [Information Practices Act](#) (California statute)
- [Family Educational Rights and Privacy Act](#) (FERPA)

General Resources

- The [Privacy Technical Assistance Center (PTAC)](#) explains, in plain language, FERPA rights for families as well as responsibilities of institutions that hold student records (U.S. Department of Education)
- The [Family Policy Compliance Office (FPCO)](#) provides guidance and resources for parents, students, and school officials on FERPA and the Protection of Pupil Rights Amendment (U.S. Department of Education).
- [Data: The Missing Piece to Improving Student Achievement](#) is a short interactive guide that illustrates the importance of education data and the efforts underway to make data more actionable (Data Quality Campaign).
- [Who Uses Student Data? Infographic](#) and [Video (2:31min)](#) describe the important reasons data are collected, and how student data are—and are not—accessed and used. (Data Quality Campaign)
- [A Stoplight for Student Data Use](#) summarizes the main provisions of FERPA and related regulations, including when a student's personally identifiable information may be securely shared under the law (Data Quality Campaign).