Research Agenda Subcommittee Meeting Summary

August 18, 2020

This document provides a summary of the key points that emerged from a half-day 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/research-agenda-subcommittee (click on "Meeting Materials").

August 2020 meeting had the following goals:

- Provide an update on decisions by the workgroup
- Finalize suggested content for employment area
- Provide input on the draft data request process
- Create recommendation on how to integrate an Institutional Review Board
- Create recommendation on how to integrate a Disclosure Review Board
- Provide comments on the comprehensive research agenda

The following subcommittee representatives attended the meeting:

Tom Vu, Association of Independent California Colleges and Universities; Tine Sloan, California Commission on Teacher Credentialing; Valerie Lundy-Wagner, California Community College Chancellor's Office; Ben Allen & Jonathan Isler, California Department of Education; Akhtar Khan, California Department of Social Services; Janet Buehler, California Department of Technology; Jennifer Schwartz, California Health and Human Services Agency; Martha Friedrich, California School Information Services; Jessica Moldoff, California Student Aid Commission; Dan Rounds, California Workforce Development Board; Muhammad Akhtar, Employment Development Department; Alyssa Nguyen, RP Group; Tongshan Chan, University of California Office of the President; Jesse Rothstein, University of California, Berkeley; Michal Kurlaender, University of California, Davis; Russ Rumberger, University of California, Santa Barbara.

Workgroup Update

The meeting began with an update on the decisions at the July Cradle-to-Career Data System Workgroup meeting and the community engagement campaign.

Employment outcome recommendations

A homework team made up of a subset of Research Agenda Subcommittee members summarized the updates to the employment outcomes portion of the research agenda, based on recommendations at the July meeting and a subsequent discussion. Key changes included:

Dashboard:

- Default view shows employment and earnings outcomes for graduates
- Update labeling to more accurately reflect employment data

Query Builder:

• Include highest level of postsecondary education attained

 Focus labor market information on high-demand occupations, rather than for all education pathways

Priority Research Studies

- Include items suggested in the small groups at the July meeting
- Examine workforce training pursued after COVID 19 and the ensuing economic dislocation
- Prioritize studies on supply and demand that leverage labor market information

The group discussed the types of employment data available and reiterated the need for information on the number of hours worked per quarter and their occupation. Subcommittee members requested the ability to weigh in on a larger list of new data elements that are needed when that topic is addressed next spring.

There were no concerns raised about the updates to the employment outcomes section of the research agenda.

Data Request Process

The facilitator described how the proposal was developed and provided a high-level overview of the contents. Baron Rodriguez, who previously provided technical assistance to state longitudinal data systems, described data request processes similar to the proposed model that have already been implemented in Kentucky and Texas. The group raised the following questions and provided comments as noted below.

How are the managing entity and the partner entities involved in reviewing the request? The managing entity does a first review to ensure the form is filled in correctly and to ensure that the data cannot be accessed through the query builder. The Research Advisory Committee screens requests for alignment with the vision and research agenda and examines methodology. The partner entities providing the data evaluate requests that pass these two reviews and have the ultimate decision about whether the request is approved and which data elements are provided. Throughout, there are feedback loops so the requestor can address concerns that are raised.

Who will be on the Research Advisory Committee? A rotating subset of the entities on the governing board plus several academic researchers.

Can data beyond the P20W data set be requested? For non-education partners, some additional elements will be available, which will be listed in a public index.

Could data be accessed through a public records request? The authorizing legislation will make the Cradle-to-Career system exempt from these requests, on the grounds that the data should be requested from the data providers.

Is there a vote on whether to approve a request? It must be unanimously agreed to by all entities contributing the data. Baron Rodriguez recommended specifying that only data providers can veto a data request in the charter for the advisory committee.

Some states have struggled with data contributors stalling review so that they are never officially approved or denied—how will this process make it more possible to get the data requested? The process

will have transparency because there will be a record of requests kept on a public portal, their status, and reasons for requests that are denied. In addition, there will be an established cadence for review meetings. Finally, the managing entity will be tasked with serving as a conduit for communications and project managing the process to identify whether a request has stalled.

What types of reasons are typically given for denying requests? Baron Rodriguez noted that the most common issues are that the data is available from public sources or that the data elements requested are not appropriate for answering the stated research question. Several partner entities concurred based on their own experience. Members of the subcommittee who are researchers noted that they have been denied requests because the topic wasn't a priority for the data contributor. Cameron Sublett from WestEd noted that some state systems clarify on their website that they only grant requests that align with the longitudinal system research agenda. When researchers expressed concern that a request might be denied because it would make the data contributor look bad, several agencies noted that they provide data even when they know the results might reflect negatively on them. Cameron Sublett suggested reviewing Georgia's feasibility rubric, which might serve as a model for evaluation criteria, at: https://gosa.georgia.gov/sites/gosa.georgia.gov/files/Feasability%20Review%20Rubric-External.pdf

If the requestor picked inappropriate data elements for their request, how is this handled? Through a direct negotiation with the data provider. Jennifer Schwartz of CHHS noted that Civil Code section 1798.24(t) requires that only the minimum necessary data be used. Baron Rodriguez clarified that the review process would examine whether data could be provided at a more summary level and still answer the research question.

Would it be possible for the requestor to address the Research Advisory Committee directly to streamline these discussions? There will be opportunities for direct discussions with the data providers once requests pass the alignment and methodology review by the Research Advisory Committee, particularly around data elements and granularity.

Can the partner entity prevent a study from being released? No, but they can request that the research include a disclaimer in their report or that the report not be posted to the public research library.

The proposal says that no identifiable data will be provided, but can the data truly be deidentified, even when fields like name and birthdate are removed? Many subcommittee members noted that due to the volume of data that will be available, it would be possible for a requestor to reidentify the records.

Suggestions:

- Approve all requests that don't raise red flags
- Provide clear criteria for evaluating requests
- Have concrete categories for why requests are denied, which should not include preventing
 research that may point out a problem or preventing research because it is not a current priority
 of the data provider
- Provide clear criteria for preventing a report from being posted on the public research library
- Remove references to deidentified data and instead refer to data as either summary or unitary

Institutional Review Boards (IRB)

Cameron Sublett of WestEd provided an overview of how other states approach IRB requirements. Then, Larry Dickey of Committee for the Protection of Human Subjects (CPHS) described its review board, which is used by many state agencies to support compliance with federal regulations and state laws like the Information Practices Act (IPA). As the subcommittee discussed an appropriate IRB process for the Cradle-to-Career system, key points included:

- Both federal and state laws require an IRB for data in longitudinal data systems, but institutions
 of higher education do not always require IRBs for this type of information
- Other IRBs, such as ones managed by individual Universities of California, are not able to address the IPA
- CPHS can only accept federal IRBs, not IRBs created by higher education institutions
- Many of the partner entities do not have their own IRB, and several use CPHS
- The IPA requirements are similar to the requirements laid out in the data request process, so to avoid a duplication of effort, ensure the two forms align
- In order for the Research Advisory Committee to serve as the IRB, legislation would be needed to modify the IPA, an application would be needed to secure federalwide assurance, and authority would need to be granted by the data contributors
- There is precedent for data that is stored in a secure enclave to be reviewed periodically by CPHS based on the process for data access rather than the data involved, but an IRB would still be needed to address FERPA requirements
- There may be significant workload implications of having CPHS provide the IRB for the Cradle-to-Career system, which will require additional funding

The subcommittee used a poll to determine whether to recommend using CPHS as the IRB for the Cradle-to-Career System, with the following results:

• Yes (9): 60%

• Yes, with reservations (4): 27%

• No (2): 13%

Some who had reservations or voted no said their concern was the workload implications. Others indicated that they were concerned that the multiple levels of review could make the data request process cumbersome and slow.

Disclosure Review Board (DRB)

Baron Rodriguez described DRBs and clarified that they are intended to ensure that when data are released, individual identities are not disclosed. As the subcommittee discussed whether to have a DRB for the Cradle-to-Career system, key points included:

- While DRB responsibilities can be handled by an IRB, it will increase their workload and may require a different skillset
- CPHS asks data contributors to pre-screen requests to address suppression issues and leaves decisions about whether to release data up to those agencies
- Texas reviews outputs at the table level before data is released from their longitudinal system,
 which is similar to a DRB and so potentially could be integrated into the data request process

• Suppression requires the expertise of statisticians, so it may be too complex to assign to the Research Advisory Group or the managing entity

The subcommittee used a poll to determine whether to recommend having a DRB for the Cradle-to-Career System, with the following results:

- Yes (8): 57%
- Yes, with reservations (3): 21%
- No (3): 21%

One participant who voted no indicated that the process would be duplicative if the data provider has its own DRB process.

Given that there was concern about how to implement a DRB appropriately, some recommended that the concept should not be integrated with the data request process and rather should be tackled once the data system is being built.

Research Agenda Recommendation

The subcommittee provided comments on the most recent iteration of the research agenda. Suggestions included:

- For priority research studies related to early care and learning, rather than limit studies to outcomes in primary school, include later outcomes as well
- For the items intended to provide contextual information about educational offerings by showing the proportion of students participating in those opportunities, adjust the wording to ensure that the calculation is not skewed by the number of individuals in a school

The group voted unanimously to recommend the research agenda to the workgroup.