September 29, 2022

NSCT Subcommittee on Equitable Data
Office of Science and Technology Policy
Executive Office of the President
Eisenhower Executive Office Building
1650 Pennsylvania Avenue
Washington, D.C. 20504

RE: Request for Information on Equitable Data Engagement and Accountability (87 FR 54269)

Dear Members of the Subcommittee:

I am writing on behalf of the Data Quality Campaign (DQC), a nonprofit organization focused on changing the role of data to ensure that it is useful for individuals navigating their pathways through education and into the workforce. We advocate for data policies and practices that will result in better support and services to individuals, particularly policies and practices related to state longitudinal data systems (SLDS)—systems that contain early childhood, K–12, postsecondary, and workforce data.

DQC appreciates the subcommittee for asking these critical questions about the ecosystem necessary to support better data use. From our perspective, SLDS are both a critical foundation for federal data collections and essential to ensuring equitable access, usage, and collaboration across levels of government. As such, we are focusing our comments about the state of the current inter-governmental data sharing ecosystem on questions 1, 3, 6, and 7 in the Request for Information.

1. Examples of successful collaborations between the federal government and (a) tribal, territorial, local, and state governments or (b) local communities involving equitable data?

A number of states and local governments have constructed longitudinal data systems that link data across agencies (e.g., early childhood, K–12 education, postsecondary education, and workforce) and with various federal data sources. Some leading states use these SLDS to understand inequities within their education and workforce programs, help state residents make better informed decisions about their own education and workforce journeys, and direct state resources to address inequities.

- The Kentucky Center for Statistics (KYSTATS) incorporates data from the state Occupational Employment and Wage Statistics program and the Bureau of Labor Statistics to produce employment and wage estimates that are available for students, graduates, and job seekers through the KYSTATS Career Explorer. Kentuckians can search by desired salary, major or certification, or skills and abilities, providing accessible and equitable data to empower individuals in making career and education decisions.

- Allegheny County (PA) Data Warehouse is an integrated data system incorporating 21 categories of data at the local, state, and federal levels, enabling coordinated services across multiple family supporting sectors like health and home visiting. As a result, Allegheny County is able to proactively offer support to some of its most vulnerable residents. Allegheny County has created clear, accessible tools the public can use to access its warehouse, including their Analytics tool. While this is largely a health and human services data warehouse, Allegheny County has incorporated some K–12 education data from local school districts, thinking broadly about the types of data that can be connected to best serve their community. These wide data linkages indicate the data collaboration opportunities that could be possible across many sectors (e.g., education, workforce, health), demonstrating how increased data sharing and access can lead to more equitable data usage.
- California's new Cradle-to-Career System, when fully constructed, will link data across multiple agencies and sectors. One exciting component of the new system will be scaling up the California College Guidance Initiative (CCGI), which allows students, parents, and counselors to track alignment between a student's individual high school coursetaking and the admissions requirements for California's public colleges. CCGI incorporates financial aid data from the Free Application for Federal Student Aid (FAFSA), streamlining the application process for state and federal financial aid and promoting more equitable access to higher education.
- Montana is leveraging federal grants to link Tribal Colleges and Universities with the Montana Office of Public Instruction and other four-year universities, giving decisionmakers insight into historic postsecondary and workforce opportunity gaps so they can work to close them.
- The Coleridge Initiative's Multi-State Postsecondary Dashboard will allow states to better comprehend the employment journeys and outcomes of individuals. By utilizing unemployment insurance data and data from the Employment and Training Administration as well as data from the workforce development offices of participating states, each state in the collaborative will be able to better understand the economic outcomes of their residents and college graduates who seek employment in neighboring states. For instance, the multi-state collaborative will allow states to understand the disparate economic impact of the COVID-19 pandemic on different populations within their state.

3. What policies, resources, programs, training, or other tools can facilitate increased data sharing between different levels of government (tribal, territorial, local, state, or federal) around equitable data?

Below are a range of policies, programs, trainings, and other strategies we believe can facilitate increased data sharing across levels of government:

- **Clarification about the use of federal funds** to support infrastructure and capacity (both human and technological) for integrated data systems like an SLDS would help state and local leaders understand how federal funds may be used to support data modernization efforts and the usage of equitable data. Providing clear guidance and technical assistance on how funds may be used, braided, and blended to support SLDS modernization would ease the path of undertaking this modernization.

- **Distribution of federal funds in a non-siloed way** would facilitate increased data sharing, including the sharing of equitable data. Currently, funding comes to states and local governments from specific programs and agencies and is directed to support the data needs related to the work of those programs and agencies. Resources to support state and local data efforts do not anticipate, expect, or encourage integrated data sharing from across agencies and sectors. To create fully functioning SLDS that facilitates secure, usable, and timely data sharing, states need a new federal approach to funding. For example, the current Statewide Longitudinal Data System Grant Program could be expanded to focus on integrating data across education, workforce, and human services agencies, and widen the scope of possible grantees beyond state education agencies to P–20W councils and other statewide data governing bodies. Additionally, a new competitive grant program overseen by a Confidential Information Protection and Statistical Efficiency Act (CIPSEA) agency could be created specifically for the purpose of supporting state efforts to build and modernize their integrated data systems.
- **Expanded privacy technical assistance (TA)** from the federal government could facilitate data sharing between different levels of government, allowing them to utilize shared data to ensure more equitable outcomes for individuals, families, and communities. While the Privacy Technical Assistance Center (PTAC) exists, evolving state and local privacy needs outweigh current capacity. To provide leaders with more direct, real-time technical assistance and guidance, the federal government should make additional investments in PTAC and consider additional federal privacy TA centers.
- Programs and policies designed to **promote human capacity** could increase data sharing. While funding and technical requirements are important to data sharing, investments in human capacity and best practices are equally pertinent. Different levels of government would benefit from designated data teams with experts focused on data collaboration, sharing, and equitable practices.
- **High-quality data governance** is key to establishing a culture of effective and equitable data use between different levels of government. The federal government could promote successful data governance by collecting and sharing best practices by highlighting state laws, regulations, or models that provide strong data governance, among other strategies. For instance, one way to demonstrate effective strategies could be to highlight states like Maryland that have solidified data governance through legislation by establishing in law a requirement for actors to share data with the Maryland Longitudinal Data System Center, and develop and maintain relationships with one another in the process.

6. What policies, resources, programs, training, or tools can make equitable data more accessible and usable for members of the public?

The federal government's decentralized data policies and practices have historically made it difficult for state data users to link and use data collected by individual agencies. However, effective implementation of education and workforce programs relies on states' ability to connect data across agencies to produce reliable, timely, and accurate information for decisionmakers. It is also increasingly clear that giving states access to key federal data would make the information in state systems more robust.

- Congress's recent authorization of the **National Secure Data Service (NSDS**) is an important step in making federal agency data easier to access for state and local policymakers. As the Data Foundation has noted, NSDS offers a way to overcome existing challenges with data sharing and access by providing a central data infrastructure that facilitates coordination between federal, state, and local governments, as well as non-government organizations, to securely link, access, and analyze data for evidence building. Moreover, by connecting the NSDS to the National Center for Science and Engineering Statistics, the data service will fall under CIPSEA, a strong privacy framework used by statistical agencies.

  Through the new NSDS, a vision for effective data use that leads to real, positive impacts for people's education and workforce pathways can become a reality. To be fully successful, however, the federal government should follow these five high-level objectives to address and ultimately leverage state longitudinal data systems (P-20W) to increase educational and workforce equity:

  1. Employ federal incentives and resources to support and encourage data sharing and related systems integration across and within state agencies;
  2. Strengthen longitudinal data systems and related integration efforts for leaders to understand the long-term impacts of education and workforce programs and services receiving public funding;
  3. Improve states' access to standardized federal wage record data that are disaggregated at least by race and include information such as location and hours worked;
  4. Increase states' access to IRS and military enlistment data so they can better provide their residents an equitable understanding of postsecondary outcomes, job and credential quality, and the myriad pathways from K–12 into and through the workforce;
  5. Promote transparent and interoperable data standards wherever possible; and
  6. Disseminate best practices among states, including on issues such as privacy, security, and data governance, to foster peer learning and continual improvement.

- **Open data** and accessible, easy-to-use tools are essential to making data more usable for members of the public. Thus, the federal government should prioritize creating and improving dashboards, portals, and query builders to grant individuals and state and local governments better access to federal data, allowing for more robust data systems and informed decisionmaking.
- Congress should prioritize the passage of the **College Transparency Act (CTA**), now an amendment to the America COMPETES Act, as a way to make postsecondary data more accessible and transparent to students, families, institutions, employers, and policymakers. With CTA, various individuals will have access to data to inform decisions on postsecondary pathways and career journeys.
- The **Education Science Reform Act (ESRA)** has served an important role in rigorous education research and in providing critical investments in state longitudinal data systems. However, the needs of states and other areas of government have evolved; ESRA must be updated to ensure that the time, resources, and human capital involved in producing data and research return value to decisionmakers. Small changes that build on the Strengthening Education through Research Act can enable the Institute for Education Sciences to produce information that meets

the most pressing needs of the moment and improve state capacity to do the same. Additionally, when reauthorized, ESRA must be done so with strategies to improve data access in mind, thinking about how equitable data can be made available to the public.

- To increase data accessibility in the workforce sphere, the federal government should encourage states to **improve the usability of workforce data** by prioritizing new indicators and system improvements that enable action. For example, federal action could encourage participation in cross-state data sharing tools like the State Wage Interchange System (SWIS), even expanding the scope of these efforts by including additional data in SWIS. Further, exploring other programs that provide more federal workforce data back to states to give them access to more robust data on employment outcomes could serve as a way to increase public accessibility.
- From a state perspective, **Georgia has created a virtual "tunnel"** that links data from a single state longitudinal data system directly to district-level student information systems and allows district administrators, principals, teachers, and parents to access state education data through their district's existing program. Local education agency officials can view and compare state and local performance information on specific schools or programs to identify best practices, while teachers and parents have access to detailed longitudinal data to support children in the classroom and at home. With this tunnel, Georgia has combined local data with state-level resources and made it easier to use education data in meaningful ways. In particular, smaller, less resourced school districts can provide teachers and parents a rich amount of data on their children's academic achievement and well-being that they otherwise would not be able to access.

7. In which agencies, programs, regions, or communities are there unmet needs, broken processes, or problems around participation and accountability that could be remedied through stronger collaborations and transparency around equitable data?

There are many unmet data needs, some of which we have described in response to question six. Some of these unmet data needs stem from a lack of trust; even when data is transparent, many communities struggle to trust data because they do not see public officials using it in ways that improve outcomes for people in their communities. The examples below highlight some of these sentiments:

- There is a need to improve institutional, state, and federal data related to Native American communities. The data extracted from Native American communities is often inconsistent, omits important variables, and is produced or used within an environment where the Native communities mistrust the communities collecting the data. New ways of collecting data, like oversampling for Native American communities, using indigenous data collection, and measuring cultural identity rather than just asking whether someone is American Indian or Native American could improve the kind of data collected and thus available for use by Native American communities to better understand the outcomes and pathways of their community members.
- Issues with data collection and transparency raised concerns that the 2020 census was less accurate than previous censuses. Leaders from civil rights groups NALEO and the National Urban

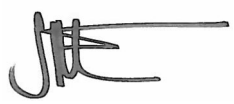
League brought attention to the undercount, noting the negative impacts on communities of color via diminished political representation or distorted funding formulas, among other effects. Stronger data collaboration, collection, and transparency could have created a more accurate count.

- Migrant students and communities suffer from a lack of consistent and reliable data collection. For example, in 2017, Wyoming ended its program for using data to support students in farmworker families. By ending the Migrant Student Information Exchange, experts warn that teachers and administrators are losing data that could minimize the disruption in migrant students' education despite their high mobility rates.
- There have historically been a number of issues and broken processes in the use of discipline data. Biased disciplinary practices and data collection can target specific student groups, including female students of color, disrupting their learning, perpetuating harmful school cultures, and contributing to historic inequities. Additionally, various instances of schools misusing discipline data to target students for monitoring by law enforcement have arisen over the past few years. This practice raises concerns surrounding privacy, transparency, and equity for agencies and communities alike.

To provide value, data systems and collaborations must serve learners and workers, policymakers, and other data consumers working to improve opportunities and outcomes for individuals. There are some bright spots and successful data sharing collaborations across various levels of government; however, more can be done to promote equitable data access, transparency, and usability.

We encourage OSTP to think creatively about the ways the federal government can support data sharing and make data work for all communities, revealing existing social or economic barriers and driving solutions to address them. Our partners, the Data Coalition and Results for America have also offered valuable thoughts and resources on this topic that OSTP should consider. DQC looks forward to working with you to ensure that data policies and practices can equitably achieve federal, state, and local needs.

Sincerely,



Jennifer Bell-Ellwanger
President and CEO