

Prioritizing Data to Support Students through Education and into Jobs

Helping individuals navigate education and workforce opportunities in the postpandemic world requires understanding, using, and making transparent data about what works for whom and under what circumstances to drive successful education and workforce outcomes. Fortunately, states have been building cross-agency, longitudinal data systems. But the design of current state data systems and the policies that govern them are not oriented toward providing access to information that helps individuals, providers, the public, and policymakers take immediate action.

To make this change, states can and should develop robust statewide longitudinal data systems (SLDSs) that connect and protect data from early childhood through the workforce. The bones of the necessary infrastructure exist in every state data system at varying degrees of quality. **The Trump administration and 119th Congress can ease and expedite state efforts to improve their SLDSs to help individuals and policymakers chart pathways through education and the workforce.**

OPPORTUNITIES FOR THE TRUMP ADMINISTRATION AND CONGRESS

State and local leaders can move ahead with greater confidence if the Trump administration and Congress prioritize the following areas of work:

1. Strengthen statewide data infrastructure, governance, and quality. Federal leaders need to partner with states to build a strong integrated data ecosystem within states that supports all stakeholders. That work begins with encouraging and incentivizing the policy conditions necessary for a strong SLDS but must also include sufficient investment. To that end, the president's first budget request and other policy actions, including congressional action, should maintain or increase the appropriations levels for the current SLDS and Workforce Data Quality Initiative (WDQI) grant programs and expand eligible state-level grantees and uses of funds to incentivize states to undertake much-needed improvements in their data systems. The Trump administration and Congress can further support these efforts in the following ways:

- **Provide clear agency guidance and technical assistance** that aligns with OMB's 2024 revision to the Uniform Grant Guidance on how existing funds may be used, braided, and blended to support SLDS modernization.
- **Explore other funding sources** such as a state data block grant or a cross-agency pilot similar to the Temporary Assistance for Needy Families (TANF) Data Innovation Pilot.
- **Pass the College Transparency Act (CTA).** Leaders can refresh federal requirements, including updating relevant laws, regulations, and guidance, to give states the support and encouragement needed to continue to prioritize improvements to their SLDS when faced with competing priorities.

2. Protect individual data. Federal and state agencies have a responsibility to keep individual data confidential and secure especially when employing new artificial intelligence (AI) technologies.¹ The Trump administration and Congress can support these efforts by:

- **Revising FERPA** so that it meets current data privacy needs, including providing clear guidance about when and how uses of individual data within AI tools can be compliant with FERPA and other federal privacy laws.
- **Issuing joint guidance** from ED and DOL on the privacy implications and permissibility of integrating education and workforce data, among other types of data, across agencies.

¹ This paper uses the term *AI* to encompass both artificial intelligence and other emerging technologies that may raise similar data use and ethical considerations.

- **Establishing guardrails and disseminating best practices** related to AI use and contracting. Federal leaders should set forth clear guardrails to govern states' ethical use of AI or other emerging technologies within data systems, including prohibiting state actors from uploading personally identifiable information (PII) into open, generative AI tools. The Trump

administration also should disseminate best practices related to AI vendor contracting policies, including templates and model language that state and local leaders can use for procurement processes as well as recommended language for state actors to govern the ownership and control of data or intellectual property when using AI with third-party vendors.

3. Ensure transparency. Federal and state leaders should incorporate transparency provisions into all data policies and practices so that individuals understand what data is collected about them and how their data is used. The Trump administration and Congress have an opportunity to update and modernize transparency and reporting requirements and to be more intentional about how data is used to improve outcomes for all learners and workers. For example:

- **Protect requirements for and innovative efforts to annually assess students** to determine grade-level proficiency and growth.
- **Encourage transparency and continuous program improvement** by providing state data systems clarity or direct approval on how to obtain access to federal data that is relevant to education and the workforce (e.g., wage and employment records; postsecondary enrollment data from across state lines; military enlistment information; FAFSA data, including the

accompanying federal tax information; other state administrative data, including public benefits data).

- **Enforce ESSA's state report card requirements** so that the report cards continue to be powerful tools for communicating how schools are serving different groups of students.
- **Institute initial improvements to WIOA data reporting** regarding eligible training providers and revisit suppression practices to increase the proportion of programs with available data (e.g., rolling up over multiple years) on [TrainingProviderResults.gov](https://www.trainingproviderresults.gov).

4. Build capacity. Federal and state agencies must invest in training for everyone who uses individual-level data. Federal support for training should focus on building literacy, including how to recognize and address algorithmic bias in the use of AI, and other privacy and ethical concerns. Existing federal efforts can be expanded and enhanced through the following actions:

- **Appoint a person to the Domestic Policy Council staff who is an expert in education and workforce data and privacy.** This person should:
 - Be responsible for aligning decisionmakers from relevant agencies to develop directives that can drive guidance, technical assistance, and support to state and local governments to implement and maintain SLDSs that enable appropriate access to and sharing, use, and protection of key education and workforce data; and
 - Coordinate with the General Services Administration to identify the most effective way to implement support and technical assistance in an efficient, aligned manner.

- **Support multistate collaborative efforts.** Federal agencies should increase support for and encourage participation in cross-state data linkages, shared problem solving, and collaborative efforts to develop common solutions.
- **Partner with state and other federal agencies and stakeholders to ease the burden of accessing federal labor market outcomes data.** Using secure, privacy-protected linkages; an exchange; or a clearinghouse that minimizes sharing of PII (such as those described [here](#) and [here](#)) could support the creation of state-level employment scorecards that can more easily report outcomes for participants in WIOA-supported programs across a longer range of time.

Data Quality Campaign staff welcome the opportunity to further discuss these recommendations. We are confident that the Trump administration and Congress will take the necessary steps to ensure that states, local governments, and communities have the information they need to help their residents chart their paths to success. View a more comprehensive version of this memo, with recommendations for bold, longer-term actions that can reinvigorate the nation's data infrastructure to meet current demands and better handle future challenges, [here](#).