DGC Data Quality Campaign



Driver's License Data Can Help States Better Understand Education and Workforce Pathways

Statewide longitudinal data systems (SLDSs) often rely on personal identifiers to securely link individual-level data over time across early childhood, K-12, higher education, and the workforce. However, different sectors use different types of personal identifiers-specific data elements such as full name, date of birth (DOB), and social security number (SSN)—which can make accurately connecting records difficult. Driver's license data offers a single verifiable record that can be used to fill gaps in other records and accurately connect data across sectors. Depending on the sector providing the data, names, DOBs, and SSNs are not always verified and are sometimes missing entirely, making understanding the pathways between education and the workforce and the outcomes of those pathways challenging. Policymakers need to connect education and wage data to see the outcomes for students graduating from their K-12 schools and public institutions of higher education and accurately assess whether students are being properly prepared to succeed in the state's labor market.

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The addition of driver's license data has enabled SLDSs to provide more accurate information about the education and workforce experiences and pathways of individuals, enabling students and workers to make more informed decisions.

This brief is intended to help state leaders understand the utility and risk of including driver's license data in their SLDS matching process. It answers the following questions:

- What is driver's license data, and who is responsible for it?
- Why incorporate driver's license data into your state's SLDS?
- How can driver's license data improve the accuracy of information?
- Which states are already working to enhance SLDS matching with driver's license data?
- Which federal law affects the sharing of driver's license data?
- How does a state safely use driver's license data to enhance its SLDS matching process?

The brief also includes considerations for state leaders as they pursue this work.

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What is driver's license data, and who is responsible for it?

Driver's license data is often collected and managed by a state's motor vehicles department, transportation department, or similar agency. The data collected generally includes elements such as:

- Full name (including first name, middle name, last name, generational suffix, and any additional "also known as" names);
- DOB;
- Sex or gender;
- Race and/or ethnicity;
- Residence address (including city, state, and zip code or county of residence);
- Mailing address (including city, state, and zip code);
- License number, license status, and license renewal date;
- Voluntary veteran's status;
- SSN; and
- Date the record was last updated.

Why incorporate driver's license data into your state's SLDS?

States develop SLDSs to link data from multiple agencies from early childhood to the workforce. However, incorporating and linking different data sets can lead to gaps in the data due to different collection practices, data elements, or reporting requirements. For example, agencies may use different classifications for race, or one agency may collect information on gender or location while another does not. Without a common personal identifier, properly matching records across sectors can be difficult. This challenge is especially relevant to SLDSs because K–12 and higher education data sets typically lack the personal identifier used in wage data, which is SSNs. With better-matched data across the education and workforce spectrum, state leaders can provide higher-quality education-to-workforce information and trend data that empower individuals to make informed decisions and select education and training opportunities that meet their educational, financial, and geographic needs.

Driver's license data can be used to improve match rates, thus more accurately representing the state's population. Students who leave high school and enter the workforce directly are often overlooked and underrepresented in data sets. This underrepresentation is because wage records primarily, and sometimes exclusively, use SSNs as personal identifiers, and SSNs are frequently not collected in K–12 data systems. Without an additional data set, such as driver's license data, to fill in the gaps, connecting K–12 and workforce data can be difficult, leading to challenges in understanding workforce outcomes for this particular segment of the population. Driver's license data contains SSNs, which are helpful in matching to wage data, and includes demographic information that can be used to match with K–12 data, thereby solidifying the link between K–12 and workforce data.

Driver's license data can also be used to improve existing data through the addition of demographic information. Wage records, such as unemployment insurance or compensation records, reliably contain an employee's name, SSN, and wages but often lack demographic information like race, ethnicity, and gender, as well as the employee's address. By supplementing wage data with driver's license data, states can benefit from improved match rates with other data within their SLDS as well as the ability to use more disaggregated and geographic information for other purposes, including local workforce supply and demand analysis.



How can driver's license data improve the accuracy of information?

Driver's license data enables a state to resolve inconsistent data and improve matching and data quality within its SLDS. Leaders are then able to provide more accurate and up-to-date education and workforce data to relevant parties, who can in turn use it to create tools such as dashboards and reports that better reflect the landscape and needs of students and workers, as well as the education and workforce pathways available to them. For example, improved linking across the education and workforce spectrum facilitated by using driver's license data enabled Minnesota leaders to use the Minnesota Statewide Longitudinal Education Data System (MN SLEDS) to produce easy-to-understand, high-quality high school-to-workforce reports.

Additionally, with the assistance of driver's license data, states can use their SLDSs to better enable others (e.g., policymakers, students, place-based advocacy organizations) to answer questions such as the following:

• What are the outcomes of students who enter the workforce right after leaving or graduating high

school, and how do their workforce outcomes compare to those of students who pursued a different pathway following high school graduation?

- What K–12 policies and programs (e.g., dual enrollment, career and technical education, courses of study, youth apprenticeships) correlate to increased enrollment, persistence, retention, and completion in postsecondary programs?
- How do outcomes vary for different populations, including those with barriers, both within particular geographic areas and across the state?
- What is the return on investment for individuals completing state education and employment programs?
- What are the migration patterns of students graduating or leaving high school?
- To what extent are workers crossing geographic boundaries for education and/or employment?

Which states are already working to enhance SLDS matching with driver's license data?

In some states, leaders are already using driver's license data to improve data matching in their SLDSs. Two examples to learn from are Kentucky and Minnesota.



Kentucky Center for Statistics (**KYSTATS**), the state's P–20W longitudinal data system, uses data from the Kentucky Transportation Cabinet to improve the data system's

education and workforce data files, enabling KYSTATS to provide more comprehensive outcomes information to policymakers, practitioners, and the public. Specifically, KYSTATS uses driver's license data to fill gaps in records, clean up inconsistent DOBs, and incorporate up-to-date and accurate location information. These enhancements to underlying education and workforce records enable KYSTATS to more reliably and flexibly match individual records across the education and workforce spectrum, leading to more accurate information on things like the workforce outcomes various K-12 and postsecondary programs produce for different groups of learners and workers.



MN SLEDS uses workforce data enhanced with driver's license data to better understand outcomes for K–12 and postsecondary students. The enhancements allow MN SLEDS to

more precisely match individual-level data among K–12, postsecondary education, and the workforce, providing leaders with a more precise understanding of outcomes related to specific programs and institutions. Minnesota ensures that it is protecting individuals' privacy because MN SLEDS does not actually receive driver's license data. Instead, Minnesota's Department of Employment and Economic Development (DEED) maintains a data-sharing agreement with the Department of Driver and Vehicle Services (DVS) through which DEED matches the driver's license data from DVS to its workforce data and shares the enhanced workforce data with MN SLEDS through a memorandum of understanding (MOU).

Which federal law affects the sharing of driver's license data?

A federal law, the Driver's Privacy Protection Act (DPPA), protects the privacy of personal information collected by state motor vehicle departments and sets penalties for violations. The DPPA provides different levels of restrictions for two categories of data within motor vehicle records:

- **Highly restricted personal information** means an individual's photograph or image, SSN, or medical or disability information.
- **Personal information** means information that identifies an individual, including an individual's photograph, SSN, driver identification number, name, address (but not the five-digit zip code), telephone number, and medical or disability information, but it does not include information on vehicular accidents, driving violations, and driver's status.



Under the DPPA, a state's motor vehicle department may disclose **highly restricted personal information**, including an SSN, "**for use by any government agency**, including any court or law enforcement agency, in carrying out its functions, or any private person or entity acting on behalf of a Federal, State, or local agency **in carrying out its functions**." In other words, an SSN may be disclosed to a government agency or an entity acting on behalf of the government agency *only for the purposes of* carrying out governmental functions (18 USC § 2721 (b) (1)).

A state motor vehicles department may disclose **personal information** for use in "**research activities**, and for use in producing statistical reports, **so long as the personal information is not published**, **redisclosed**, **or used to contact individuals**" (<u>18 USC § 2721</u> (b) (5)).

The DPPA permits states to incorporate driver's license data into their SLDS for the purposes of carrying out the system's governmental functions. However, due to the private nature of this information, SLDS leaders must develop added protections to ensure that the data is securely shared and stored. Within an SLDS that protects the privacy and security of the data and individuals it represents, states can use the additional and verified data elements from driver's license data as a linkage between education and workforce data. Creating this linkage improves match rates and enhances states' ability to produce education-to-workforce research and tools that are more representative of and beneficial to their residents.

States may have additional laws and policies that govern the access to and use of driver's license data. SLDS leaders and partners should review state laws and policies that may offer additional limitations and reliance.

How does a state safely use driver's license data to enhance its SLDS matching process?

Critical to operating a robust, multiagency, and multisector longitudinal data system is maintaining the privacy and security of the data. Thus, states have taken steps to create secure environments in their SLDSs governed by formal policies and procedures for sharing and storing information, including personally identifiable information (PII), that enables information like verifiable first, middle, and last names; DOB; and SSN to be shared across agencies with minimal risk. Although minimizing risk is not the same as eliminating it entirely, states can weigh the benefits of a more robust matching process to help address critical policy and practice questions against the risk of including SSNs and other verified information in their SLDS matching process.

To integrate or link driver's license data in an SLDS, **SLDS directors will need to establish a legal agreement, such as an MOU, to facilitate data sharing with the data's managing agency**. The legal agreement should clearly articulate how the use of the data aligns with the SLDS's function and should comply with all relevant federal and state privacy laws such as the DPPA discussed in the previous section. (See the "Additional Resources" section of this document for relevant MOU examples.)

When crafting a legal agreement, it is also important to consider who will have access to the data, which data elements will be shared, how the data will be stored and used, and what records will be kept and for how long. Data-sharing agreements generally should be constructed as narrowly as possible. For example, they should not expand access to a person's driving record unnecessarily. To help ensure transparency and security, a legal agreement should explicitly state all expectations and requirements.

Since the value added to an SLDS from using driver's license data comes primarily from matching, a trusted third party, such as the state's department of labor, could perform all the matching and then provide the enhanced workforce data to the SLDS. This way, the trusted third party is the only recipient of confidential information, and the SLDS still reaps the full benefits.

Considerations for State Leaders

- Political will driven by the governor's office can support the establishment of data-sharing processes for driver's license data. The governor and/or cabinet-level officials (e.g., the head of the state workforce agency) can help foster collaboration between an SLDS leader and the managing agency of the state's driver's license data. They can also assist an SLDS leader in setting a vision for how the SLDS might use driver's license data to help accomplish the state's education and workforce goals and support citizens in their education and workforce journeys.
- Driver's license data can enhance and expand the population represented in an SLDS, but leaders should be aware of limitations of the driver's license data. Driver's license data, even though it encompasses all identification documents issued by a department of motor vehicles, still is not representative

of the entirety of a population. Depending on the minimum age for drivers in a state, data will not be available for most high school students or those who do not seek a driver's license. Additionally, certain populations may be underrepresented because they are less likely to possess a government-issued photo ID.

 Incorporating any additional data into a data system requires more training and protection.
 Organizations should consider whether authorized staff need specialized training, background checks, or confidentiality agreements to ensure that the data is handled appropriately. Organizations should also ensure that their data governance structures and privacy, security, and communications policies are updated to meet the standards necessary to house and use PII.

Conclusion

State leaders are best equipped to effectively use SLDSs to serve individuals and the state when the data in the SLDS accurately and comprehensively represents the state's population. Given the current state of education and workforce data, in which a common personal identifier between data sets is not always present, certain groups of people, like those who enter the workforce immediately after high school, can go overlooked and underrepresented. Driver's license data can serve as a crucial linkage across sectors that enables a greater understanding and more complete picture of the mobility of individuals through a state's education system and into the workforce. With the current protections and security measures existing within SLDSs, states are primed to safely incorporate driver's license data in a way that ensures privacy and leads to improved analysis of statewide education and workforce trends.

Additional Resources

DATA QUALITY CAMPAIGN

- <u>Centering Privacy: Data Access and Data Protection</u>
 <u>Go Hand in Hand</u>
- What Now? A Vision to Transform State Data Systems

NATIONAL ASSOCIATION OF STATE WORKFORCE AGENCIES

 Access and Use of Drivers' License Files by State Labor Market Information Offices

NATIONAL CENTER FOR EDUCATION STATISTICS

- <u>SLDS Issue Brief: Sources and Linking Strategies for</u> Employment Data
- <u>SLDS Topical Webinar Summary: The Match Rate</u>
 <u>Dilemma</u>
- <u>SLDS Topical Webinar Summary: Using DMV Records</u>
 <u>to Access Social Security Numbers</u>

SLDS DATA-SHARING AGREEMENT EXAMPLES

- Access and Use of Drivers' License Files by State Labor Market Information Offices (includes Connecticut, Idaho, Minnesota, Nebraska, South Dakota, Virginia, and Wyoming)
- Maryland Longitudinal Data System Center and Motor
 Vehicle Administration
- Texas Motor Vehicle Records Data Contract Data Use Agreement
- Washington State Department of Licensing Vehicle
 Data Sharing Agreement





