

P20 WIN Data Sharing Agreements – Overview

All P20 WIN Memoranda of Agreement, Data Governance Policy and all attachments and appendixes have been reviewed and approved by policy and technical leaders at each participating agency along with their attorneys and the Attorney General’s Office.

I. Agency Specific MOAs

There is a primary MOA for each agency participating in P20 WIN. The first MOA is between each Participating Agency and the Connecticut Department of Labor, the P20 WIN Participating Agency that conducts the data matching functionality for P20 WIN.

SDE – DOL

BOR – DOL

UCONN – DOL

CCIC – DOL

OEC – DOL (in development)

This first and primary MOA does the following:

- Enables the agency to participate in P20 WIN
- Declares DOL as the ‘Authorized Representative’ according to FERPA for the role of matching data.
- Identifies the types of data that can be used for matching (Appendix A)
- Provides a ‘Personal Statement of Confidentiality & Non-Disclosure’ to be signed by individuals with authorized access to data (Appendix B)
- Links this MOA to the Data Request Management Procedure (Appendix C)
- Requires the agency to participate in the P20 WIN Data Governance Policy (Appendix D)

II. Data Request Management Procedure (Appendix C to each agency’s main MOA)

The Data Request Management Procedure covers the following:

- Purpose of procedure: to manage data requests within provisions of state and federal law
- Who can request data & process for doing so
- User Roles / Responsibilities
- Data Request template that addresses written requirements under FERPA such as:
 - Information about the requestor
 - Purpose of data sharing
 - Data fields to be shared
 - Protection of confidentiality
 - Dates for data destruction
 - Approval of data request by agencies whose data would be in the query
- **Template MOA.** The “template” MOA is used for each individual data request. It specifically provides authorization for an Approved Requestor to be the ‘Authorized Representative’ according to FERPA for the role of conducting an ‘audit or evaluation’ of educational records. (*Each agency whose data is included in the request must sign the MOA.*)

III. Data Governance Policy (Appendix D to each agency’s main MOA)

Establishes the cross-agency Data Governance Structure for decision making about P20 WIN

- Executive Board
- Data Governing Board

- Data Steward Committee
- The temporary continuation of program support for its initial implementation

Note: The Data Governance Policy is being amended to:

- Describe the role of the Administrative Lead Agency (ALA)
- Describe the role of the Data Matching Agency (DMA)
- Assign the ALA and DMA to specific Participating Agencies
- Establish a five year duration for these roles

IV. **P20 WIN Cost Sharing Agreement**

The Cost Sharing Agreement provides a framework for financial collaboration. Specifically, it:

- Defines the role of the Administrative Lead Agency.
- Defines the role of the Data Matching Agency
- Describes responsibilities of the Participating Agencies.
- Identifies types of costs which are to be considered In-kind and covered by existing budgets.
- Identifies types of costs for which a budget request to the legislature could be made.

Note: The Cost Sharing Policy is being amended to include:

- Removal of the ALA and DMA descriptions being moved to the Data Governance Policy.
- Circumstances by which the ALA can collect fees from data requestors for data provided
- The process by which fees collected will be distributed to the Participating Agencies
- A fee schedule for calculating fees

V. **Protocol to Expand P20 WIN**

This protocol establishes a process by which additional state entities can apply to join P20 WIN as a Participating Agency.

VI. **P20 WIN Data Governance Manual**

The P20 WIN Data Governance Manual contains material from all of the aforementioned documents and any additional practices or procedures that are followed for operational purposes.

VII. **P20 WIN Data Request MOAs**

Each data request requires the completion of a written agreement. FERPA requires a written agreement when the audit/evaluation exception is used to authorize the release of student record data without consent. The Data Request MOA declares the Authorized Representative who will conduct the audit or evaluation. The Data Request Document articulates the details and purpose of the specific data request and becomes an attachment to the Data Request MOA.

Each P20 WIN Data Request MOA includes three attachments as follows:

- **Attachment A & B:** these attachments were merged into one table that includes a list of all of the data elements necessary for a particular data request and justification for their inclusion
- **Attachment C:** This is the Personal Statement of Non-Disclosure that each individual who will have access to unit record data for analysis must sign

VIII. Additional Documents

- **Appendix E – WRIS 2 Data Sharing Agreement.** This agreement enables CT DOL to obtain wage records from other states. It is Appendix E to each agency's main MOA.
- **Data Governing Board Review document – Data Request.** This template is used to document whether each Participating Agency involved in a data request approves that their agency's data can be included. The form is incorporated into this suite of agreements as a part of the Data Request Management Procedure.
- **Data Governing Board Review document – Pre-publication Data Review.** This document is used by the Participating Agencies whose data were in a request to verify that data tables and reports produced through analysis have been completely aggregated before they can be publically released. The form is incorporated into this suite of agreements as a part of the Data Request Management Procedure.
- **Data Destruction Certificate.** This document is used to verify that the authorized representative has destroyed the analytical data files by the designated destruction date. The form is incorporated into the suite of agreements as a part of the Data Request Management Procedure.