

First Amendment P20 WIN Cost Sharing Policy

This Amendment to the P20 WIN Cost Sharing Policy is made by and among the Connecticut State Board of Education, Connecticut State Colleges and Universities, the Connecticut Department of Labor, The CT Independent College and University for Research and Public Service, Inc., the University of Connecticut, the Office of Early Childhood and the Office of Policy and Management.

WHEREAS, the P20 WIN Cost Sharing Policy ("Policy") was approved and last dated May 27, 2015;

WHEREAS, the undersigned desire to amend the Policy in accordance with the terms set forth in this Amendment; and,

WHEREAS, the undersigned agree that references made to the Policy in any and all active Memoranda of Agreement to which any of the undersigned are a party, shall mean the Policy as amended herein.

NOWTHEREFORE, the undersigned agree as follows:

1. The Policy is hereby deleted in its entirety and replaced with the amended policy, titled "P20 WIN Cost Sharing Policy as Amended", and attached hereto as Schedule A.

Connecticut State Board of Education

Dianna R. Wentzell
Dianna Wentzell, Commissioner

4/30/18
Date

Connecticut State Colleges and Universities

Mark Ojakian
Mark Ojakian, President

4-18-18
Date

Connecticut Department of Labor

Scott Jackson
Scott Jackson, Commissioner

5/23/18
Date

CT Independent College and University for Research and Public Service, Inc. (Cicu-IRPS)

Jennifer P. Widness
Jennifer Widness, President

4/20/18
Date

University of Connecticut



Dr. Lloyd Blanchard, Associate Vice Provost

4-20-18

Date

Office of Early Childhood



David Wilkinson, Commissioner

4/25/18

Date

SCHEDULE A

[See attached]

P20 WIN Cost Sharing Policy

A policy to provide a framework for sharing costs between
P20 WIN Participating Agencies

Prepared by,
P20 WIN Data Governance Committee
Published: April, 2018

Version 6.0

P20 WIN Vision

Connecticut's Preschool through Twenty and Workforce Information Network (P20 WIN) informs sound educational policies and effective educational program practices through the secure sharing of critical longitudinal data across the Participating Agencies to ensure that individuals successfully navigate educational pathways into the workforce.

Rationale

Answering policy questions to support improvements in state and local educational practices often requires linking information from multiple agencies in order to understand the factors that contribute to different outcomes. As individuals move along their educational pathways, they are served by different agencies over time. These agencies must work closely together to enable the linkage of data necessary for evaluation of the Connecticut's education programs. The collaboration between agencies involved must be sustained in order to ensure data security and address a shared policy agenda. This work requires coordination, management and staff time at agencies that need to prepare and provide data for analysis. Therefore, in addition to data sharing agreements, this collaboration requires a policy that addresses costs and how those costs are shared and managed. This policy defines in-kind and allowable costs, and it specifies that fees may be collected and how funds can be distributed to the participating agencies to compensate for allowable costs.

Policy Statement

This policy establishes an approach by which the Participating Agencies agree to collect fees and share costs associated with the ongoing maintenance, development and expansion of P20 WIN as a resource for the state.

This cost sharing policy:

1. Identifies types of costs that are to be considered in-kind and covered by existing budgets
2. Identifies allowable costs for which Participating Agencies may be compensated.
3. Provides justification for assessing fees.
4. Defines the fee schedule.
5. Describes the process for distributing funds for compensation of allowable expenses.
6. Establishes a timeframe by which this agreement will be reviewed, modified and reapproved.

Scope

This P20 WIN cost sharing policy applies to costs for the ongoing operation and maintenance of P20 WIN. Each Participating Agency is responsible for the data and data systems that reside in their respective systems. This policy covers only costs incurred as a part of the utilization of P20 WIN for sharing and linking data between Participating Agencies.

As of the date of this agreement, the Participating Agencies are the Connecticut State Department of Education (SDE), the Connecticut State Colleges and Universities (CSCU), the Connecticut Department of Labor (DOL), the Connecticut Independent College and University Institute for Research and Public

Service, Inc. (cicu-IRPS), a.k.a. Conference of Independent Colleges (CCIC), the University of Connecticut (UCONN) and the Connecticut Office of Early Childhood (OEC). If the P20 WIN collaboration expands to include additional partner agencies, and if that relationship is formalized through the execution of an MOA enabling data sharing, then this policy would apply to the additional agency as well.

While non-public agencies may be Participating Agencies in P20 WIN, only representatives from Participating Agencies that are also state agencies will make decisions pertaining to the use of public funds. By participating with P20 WIN and supporting this policy, non-public agencies agree to abide by the terms defined herein.

Definitions: for the purpose of this policy, the following definitions shall apply:

- A. Administrative Lead Agency:** The P20 WIN Administrative Lead Agency is the Participating Agency selected to provide administrative leadership for P20 WIN. (See the Data Governance Policy for additional information).
- B. Authorized Representative:** An Authorized Representative is the individual who has been designated as such in accord with FERPA for the purpose of conducting an audit or evaluation of publically funded education programs.
- C. Data Matching Agency:** The Data Matching Agency (DMA) is the Participating Agency that manages the data matching process for approved P20 WIN data requests with completed data sharing agreements.
- D. In-kind Expenses:** In-kind Expenses are expenses that Participating Agencies cover out of existing budget funds that exist separately from P20 WIN funding.
- E. Participating Agencies:** The Participating Agencies are entities that contribute data through P20 WIN for approved data requests. Current Participating Agencies are the Connecticut State Colleges and Universities (CSCU), the Connecticut State Department of Education (SDE), the Connecticut Department of Labor (DOL), the Connecticut Independent College and University Institute for Research and Public Service, Inc. (cicu-IRPS), the University of Connecticut (UCONN), the Connecticut Office of Early Childhood (OEC) and those entities that have executed a similar Memorandum of Agreement for participation in P20 WIN and that have been approved for participation by all Participating Agencies.
- F. Preschool through Twenty and Workforce Information Network or “P20 WIN”** is a federated data system in Connecticut that matches and links longitudinal data of state agencies and other organizations for the purpose of conducting audits and evaluations of Federal- and State-supported education programs.
- G. P20 WIN Executive Board:** The Executive Board is a multi-agency committee that provides vision, oversight and leadership for the data governance structure. The Executive Board consists of each Participating Agency’s system chief or designee and has ultimate decision-making authority for P20 WIN. All decisions pertaining to the use of public funds will be made only by Executive Board members from Participating Agencies that are also state agencies.
- H. P20 WIN Data Governing Board:** The Data Governing Board establishes and enforces policies related to cross-agency data management including but not limited to data confidentiality and security in alignment with the vision for P20 WIN and applicable law. It is a committee consisting of one staff member from each Participating Agency who has the authority to recommend policy and commit resources to support their agency’s participation in P20 WIN.

P20 WIN In-Kind Costs

Maintaining and supporting P20 WIN requires an extensive array of activities and resources, many that also serve other operational purposes for the Participating Agencies. In general, in-kind costs are those expenses that Participating Agencies cover within their normal operating budgets. In-kind costs are expenses that will not be reimbursed by funding acquired to support P20 WIN functions or activities.

In-kind costs include those considered 'indirect' by accountants because they are not directly traceable to a specific department, project, activity, etcetera. Simple examples are the overhead involved with the reservation and use of a conference room, the value of a copier used to prepare meeting materials or the use of the WebEx utility.

In-kind costs would also include costs that are not exclusive to P20 WIN. For example, there may be a need for a Participating Agency's Data Base Administrator (DBA) to expand or modify tables in an existing database so that new elements can be used as a part of a P20 WIN audit or evaluation. The specific act of modifying the tables may have been initiated for P20 WIN purposes; however, this activity is not specific to P20 WIN because the new data will serve other purposes as well. In addition, the time and value of the DBA as a staff member and resource to the organization extends far beyond the time spent on the isolated technical activity at hand; therefore, the time of the DBA is considered an in-kind cost and absorbed by the Participating Agency's operational budget.

P20 WIN in-kind costs also include small costs that are easily absorbed by a Participating Agency's budget. For example, the costs of photocopies or car mileage for travel between Participating Agency offices are nominal and can be managed through typical office budgets.

In addition to the general principles listed above, the following specific items will also be considered unreimbursed in-kind costs for P20 WIN unless otherwise documented through an approved budget.

- Participating Agency staff time for attending P20 WIN Data Governance committee meetings. This includes the time of Executive Staff to Executive Board meetings, representatives to Data Governing Board meetings and representatives to Data Steward Committee meetings as well as the time of any additional staff member, both full-time, part-time, agency employee and contractor who attends one of these data governance meetings
- Meeting space and meeting materials
- The cost of purchasing, upgrading analytical software or business intelligence tools
- Training that is specific to the system needs of one Participating Agency
- Insurance for hardware, software or data breach security
- Fees for legal assistance from in-house counsel or other attorney's fees
- Fees for consultants unless the expense supports the P20 WIN collaborative and not an individual Participating Agency.

Dedicated P20 WIN Costs

While many costs associated with P20 WIN will be absorbed into the existing operating budgets of Participating Agencies, some costs require funding. If funds are available, reimbursement may be made for costs that are clearly related to the functionality of P20 WIN and that pertain to activities that have clear benefit to stakeholders beyond an individual Participating Agency such as to the State of Connecticut itself. Costs such as these should not be the burden of one agency, but should be shared by the State because they benefit the State as a whole.

Known dedicated costs include, but are not limited to:

- Annual license fees for data matching software including costs for software upgrades
- Hardware upgrades if needed for dedicated hardware used to support data matching process
- Software if needed for dedicated programming to support the data matching or analysis
- Staff time for the Data Matching Agency to conduct matches between data sets from the Participating Agencies for approved data requests
- Staff time for Program Management as provided by the Administrative Lead Agency
- Analytical support for each Participating Agency to ensure staff are available to prepare data sets and conduct analysis as required by approved data requests
- Vendor or consulting fees for communications and marketing support
- Costs for marketing and communications materials that are specific to P20 WIN
- Travel costs to US Department of Education sponsored SLDS / P20WIN conferences
- Costs that are clearly documented by a Participating Agency as being directly related to the operation, maintenance or usage of P20 WIN for the benefit of the greater system and that the Data Governing Board approves as reimbursable costs.
- Other costs as identified by the P20 WIN Data Governing and Executive Boards.

Justification for Assessing Fees

Supporting P20 WIN requires the time and resources of staff members in each P20 WIN Participating Agency that extend beyond what agency specific operational budgets support. Therefore, in order to maintain the capacity to function, Participating Agencies need to offset the associated costs of operation. When funds are available, Participating Agencies should be compensated for costs associated with managing the P20 WIN collaboration, facilitating the process of conducting data requests, preparing data, matching data, conducting analysis, preparing reports and other allowable expenses. Therefore, the P20 WIN Executive Board agrees that fees may be assessed for data requests.

Fee Schedule

With the exception of P20 WIN Participating Agencies, all requestors will be required to pay a fee unless waived by the Data Governing Board. Entities that are not P20 WIN Participating Agencies will be charged a fee. This fee may be reduced at the discretion of the Data Governing Board if payment of the fee would be deemed an undue hardship to the requestor and the evaluation is of importance to the state. Researchers employed by a university who are conducting independent research will not be exempt from the assessed fee unless the Data Governing Board determines that a waiver is in order.

Fees will be assessed according to the following parameters.

- No fee will be charged for aggregate data that is publically available.
- A separate charge will be assessed to support expenses that pertain to the collaboration of P20 WIN and not to one individual agency directly.
- Fees will be calculated using the fully loaded average hourly rate for institutional researchers at CSCU and an average of the estimated hours that participating agencies spend preparing and matching data files.
- Payment will be required from the data requestor before any data are provided to the requestor.

The specific fee for a given data request will be calculated using: 1) a flat fee to support the cost of matching the data files and managing the data request process, 2) a fee based upon the number of Participating Agencies whose data are necessary for the request and 3) a smaller flat fee to offset the cost

of non-personnel expenses. An additional charge may be assessed if a Participating Agency needs to pay for access to a data set that is not directly available. The pricing model is as follows:

- \$1,000 for each agency from which data is required.
- \$1,500 for the data matching process.
- \$1,500 for Project management
- \$500 for Non personnel costs

A P20 WIN data request must include data from at least two agencies, so the minimum fee would be \$5,500. If data from all agencies are necessary for a data set, then the fee would be \$9,500. Data from three agencies would be \$6,500. If a data request includes additional data sets over time, then each additional data extraction would be assessed an additional fee. The Data Governing Board may consider reducing the fee for multiple data sets. Values are for example only.

Role	Agency	time spent	Fee per data set
ALA	CSCU	Managing	\$1,500
DMA	DOL	conducting match	\$1,500
Data Provider	OEC	preparing data	\$1,000
Data Provider	SDE	preparing data	\$1,000
Data Provider	CSCU	preparing data	\$1,000
Data Provider	UCONN	preparing data	\$1,000
Data Provider	CCIC	preparing data	\$1,000
Data Provider	DOL	preparing data	\$1,000
		subtotal	\$9,000
	P20 WIN	Non-personnel	\$500
		Total Fee	\$9,500

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ALA	CSCU	Managing	\$1,500
DMA	DOL	conducting match	\$1,500
Data Provider	OEC	preparing data	
Data Provider	SDE	preparing data	\$1,000
Data Provider	CSCU	preparing data	\$1,000
Data Provider	UCONN	preparing data	
Data Provider	CCIC	preparing data	
Data Provider	DOL	preparing data	\$1,000
		subtotal	\$6,000
	P20 WIN	Non-personnel	\$500
		Total Fee	\$6,500

The charge for non-personnel related expenses is not intended to cover all expenses related to managing the data request or P20 WIN program management. Rather, this fee is assessed to ensure that funds are

available to support overall P20 WIN expenses such as the cost of the data matching license fee or marketing materials.

Distribution of collected P20 WIN funds

Funds not tied to specific data requests

It may occur that P20 WIN receives funds that are not tied to a specific data request. This might occur if P20 WIN receives a funding allocation from the state legislature, a donation, a grant or if there are funds from fees collected that were not fully distributed. In such a circumstance, remaining funds may be used to support P20 WIN dedicated costs as defined by this policy. In order to receive payment for allowable expenses, the Participating Agency must submit an invoice to the P20 WIN Program Manager identifying the specific expense, the date or dates incurred, and any supporting documentation. Invoices must be submitted within 60 days of the date that the expense was incurred in order to be considered for reimbursement. If the expenses incurred occurred over a period of time (e.g. development of marketing materials over 3 months), then the final date of this time period will be used in setting the beginning of the 60 day period.

Funds from a grant

If grant funds are received to support work to be completed through P20 WIN, expenses will be reimbursed according to the terms of the grant and the budget as defined for that grant where applicable.

Payment distribution

After a fee is received, the ALA will distribute the funds to the involved Participating Agencies according to the prescribed pricing model. If the fee received was negotiated to be less than that obtained through the funding model, participating agencies will be reimbursed according to the same ratio, but no funds will be apportioned for non-personnel costs. For example, if the Data Governing Board agrees to reduce a fee of \$6,500 (for data from 3 agencies) to \$4000, then the three agencies would receive \$667 each instead of \$1,000, the ALA and DMA would receive \$1,000 each and there would be no apportionment for non-personnel costs.

- Reimbursement to all agencies participating in a data request will occur after each of these agencies have provided their data for the matching process to the Data Matching Agency.
- Reimbursements to public agencies will be made through a Core CT Transfer Invoice.
- Reimbursements to non-public agencies will be made via check.

Issue resolution

All parties understand that a majority vote of the public P20 WIN Data Governing Board representatives will be the final decision maker on how funding is to be distributed for any given data request. Issues that cannot be resolved by the P20 WIN Data Governing Board may be taken to the P20 WIN Executive Board members for resolution.

Duration

This Cost Sharing Policy shall be in effect from the date of the last signature and shall remain in effect until revised or terminated. With the final signature, the prior Cost Sharing Policy is inactive. Additional agencies that join P20 WIN as Participating Agencies will add their signature to this document to demonstrate adoption of this Cost Sharing Policy.