

## **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  
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Version 3.0

## **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. A data sharing system that connects data across agencies and also supports a broad policy agenda needs strong and sustained collaboration to support and maintain data sharing efforts securely and systematically. It also requires a cost sharing model that addresses how costs will be managed and allows Participating Agencies to support the use of the system without creating cumbersome administrative processes that hamper efficiency and utility.

## **Policy Statement**

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

This cost sharing policy:

1. Defines the role of the Administrative Lead Agency.
2. Defines the role of the Data Matching Agency
3. Describes responsibilities of the Participating Agencies.
4. Identifies types of costs which are to be considered In-kind and covered by existing budgets.
5. Identifies types of costs for which a budget request to the legislature could be made.
6. Establishes a timeframe by which this agreement must be reviewed, modified and reapproved.

## **Scope**

This P20 WIN cost sharing policy applies to costs for the ongoing operation and maintenance of P20 WIN that are paid for by P20 WIN Participating Agencies. 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 Board of Regents for Higher Education (BOR), the Connecticut Department of Labor (DOL) and the Connecticut Independent College and University Institute for Research and Public Service, Inc. (cicu-IRPS), a.k.a. Conference of Independent Colleges (CCIC).

While non-public agencies may be Participating Agencies in P20 WIN, all decisions pertaining to the use of public funds will be made only by representatives from Participating Agencies which are also state agencies. By 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 that has been selected to provide administrative leadership for P20 WIN. (See details in the following section).
- 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 is the Participating Agency that has been selected to manage the data matching process for approved P20 WIN data requests with completed data sharing agreements.
- D. **In-kind Expenses:** In-kind Expenses are expenses which Participating Agencies cover out of existing budget funds which exist separately from P20 WIN funding.
- E. **Participating Agencies:** The Participating Agencies are the Connecticut Board of Regents for Higher Education (BOR), the Connecticut State Board of Education, the Connecticut Department of Labor 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 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 which are also state agencies.
- H. **P20 WIN Data Governance Policy:** 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.

### **Administrative Lead Agency (ALA)**

One of the Participating Agencies will be selected by the P20 WIN Executive Board to serve as the Administrative Lead Agency to facilitate smooth and efficient operation of P20 WIN for the benefit of the Participating Agencies and the greater benefit of the State of Connecticut. Responsibilities of the ALA include, but are not limited to the following:

#### Responsibilities

- In collaboration with the Participating Agencies, develop a budget for each biennial budget term to support costs across all Participating Agencies associated with ongoing operation, maintenance and improvement of P20 WIN.
- Submit a budget request that includes funding for P20 WIN to the legislature and facilitate its approval.

- In collaboration with Participating Agencies, develop memoranda of agreement or contracts as necessary to distribute funds allocated by the legislature for P20 WIN to the Participating Agencies as defined in the approved budget.
- Provide financial back-office support for managing the receipt and distribution of funds according to fully executed P20 WIN agreements.
- Provide Program Management to support the continued operation, maintenance and improvement of P20 WIN as a resource for the Participating Agencies and the State.
- Provide for meeting space and materials as needed.

### **Data Matching Agency**

The structure of P20 WIN requires that one Participating Agency provide data matching services for approved data requests. The Department of Labor currently provides this service, and the specific responsibilities of DOL in this role are defined in MOA that exist between DOL and BOR (located at: <http://www.ct.edu/files/pdfs/P20-WIN-BOR-MainMOA-signed.pdf>) and DOL and SDE (located at: <http://www.ct.edu/files/pdfs/P20-WIN-SDE-MainMOA-signed.pdf>). Responsibilities of the DOL include, but are not limited to the following:

#### Responsibilities

- Conduct data matches for approved P20 WIN approved data requests.
- Work with representatives from the Participating Agencies whose data is included in an approved data request to produce a matching data set with the highest possible match rate
- Respond to requests for data matches in a timely fashion.
- Provide a matrix of data record groups and generic identifiers to Authorize Representatives for approved data requests.
- Document the receipt and destruction of data files as they are received and destroyed according to relevant data sharing agreements.

### **Participating Agencies**

The support and involvement of Participating Agencies are central to ongoing operation of P20 WIN. The Participating Agencies must continue to participate in the P20 WIN system and support both this policy and the P20 WIN Data Governance policy to ensure ongoing collaboration around data access and data use for the benefit of the Participating Agencies and the State as a whole. Responsibilities of the Participating Agencies include, but are not limited to the following:

#### Responsibilities

- Provide staff resources to participate in P20 WIN data governance committee meetings including regularly scheduled and ad-hoc Executive Board, Data Governing Board and Data Steward Committee meetings.
- Maintain and upgrade as necessary analytical software that enables the Participating Agency to conduct high quality data analysis.
- Maintain and upgrade as necessary system hardware and software to ensure the quality, security and availability of source data so that approved data requests, with completed data sharing agreements, can be fulfilled.
- Engage agency staff, in addition to those designated as representatives to data governance committees, as necessary to support the completion and success of P20 WIN activities.
- Help the Administrative Lead Agency prepare funding requests to the legislature if necessary.

## **P20 WIN In-Kind Costs**

P20 WIN in-kind costs are all costs incurred or related to P20 WIN participation which are not specifically identified as dedicated P20 WIN cost budgets. The following provides further explanation of the types of costs that are not likely to be included in a P20 WIN budget.

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

In-kind costs include those considered 'indirect' by accountants because they aren't directly traceable to a specific department, project, activity, etc.. 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 extend 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 can 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 in-kind costs for P20 WIN unless otherwise encumbered 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, maintaining, improving or replacing Participating Agency specific software and hardware that stores data to be shared through P20 WIN
- 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

## **Dedicated P20 WIN Costs**

Many costs associated with P20 WIN will be absorbed into the existing operating budgets of Participating Agencies; however, some costs require dedicated funding. Dedicated funding will be sought for costs that are clearly related to the functionality of P20 WIN and that pertain to activities which 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
- 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 is available to prepare data sets and conduct analysis as required by approved data requests
- Vendor or consulting fees for communications and marketing support
- 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 a part of the budget.
- Other costs as identified by the P20 WIN Data Governing and Executive Boards.

**Program Support**

To allow for smooth continuation of system development and to support the work of the Executive Board, the Data Governing Board and the Data Steward Committee past the initial grant phase, the role of Administrative Lead Agency will be provided by the BOR period of 2 years after the end of the grant period. This term of service may, with consent of the BOR, be extended through an amendment. This support function may also be replaced by a different administrative model as approved by all members of the Executive Board at any time.

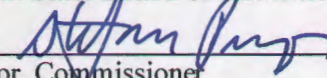
**Duration**

This policy shall be in effect from the date of the last signature and shall remain in effect until revised or terminated. If the Participating Agencies change, an amendment expressing the change shall be signed by the new Executive Board members.

**Commitment**

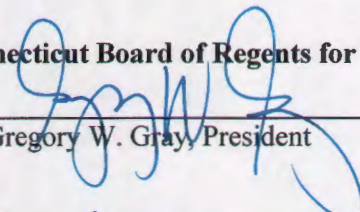
As members of the P20 WIN Data Governance Executive Board, we affirm the vision and policy set forth in this document.

**Connecticut State Board of Education**

  
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 Stefan Pryor, Commissioner

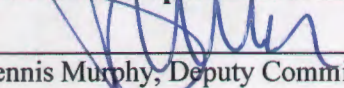
11/5/14  
 Date

**Connecticut Board of Regents for Higher Education**

  
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 Dr. Gregory W. Gray, President

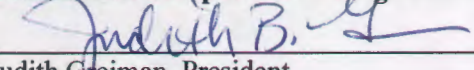
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**Connecticut Department of Labor**

  
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 Dennis Murphy, Deputy Commissioner

1/20/15  
 Date

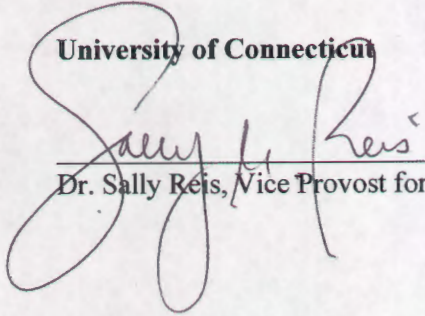
**Connecticut Independent College and University Institute for Research and Public Service**

  
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 Judith Geiman, President

11/14/14  
 Date

This addendum to the Preschool through Twenty and Workforce Information Network (P20 WIN) Cost Sharing Policy demonstrates that the University of Connecticut adopts the principles of this Cost Sharing Policy as of the date of signature.

University of Connecticut



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Dr. Sally Reis, Vice Provost for Academic Affairs

5/27/15  
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Date