As allowed by the P20 WIN Data Governance Policy, the Data Governing Board establishes and enforces policies related to cross-agency data management. With that authority, the Data Governing Board drafted this protocol to enable future expansion of P20 WiN. As required by the same P20 WIN Data Governance Policy, the Executive Board must approve this protocol before it may be used. The policy also states that future additions to P20 WIN require the unanimous consent of the Participating Agencies and may only occur after consultation with the Office of the Attorney General.

Once approved, this protocol will become a section of the P20 WIN Data Governance Manual, a living document that holds descriptions of the policies, processes and procedures that support the operation of P20 WIN.

10.0 PROTOCOL TO EXPAND P20 WIN

P20 WIN was designed with the expectation that it could be expanded in the future to include connections to additional agencies or organizations as audits and evaluations are necessary and state and federal law allow. This section identifies the process for becoming a Participating Agency that contributes to or receives data from P20 WIN.

10.1 Definition of Participating Agency

The Participating Agencies are the Connecticut Board of Regents for Higher Education (BOR), the Connecticut State Board of Education (SDE), the Connecticut Department of Labor (DOL) and those entities that have been approved for participation in P20 WIN by every Participating Agency and that have executed a Memorandum of Agreement that is similar to the current MOA’s of other Participating Agencies.

10.2 Benefits of Participating

P20 WIN is the state’s resource for longitudinal information about how individuals navigate through educational pathways into the workforce. This system will allow the Participating Agencies to address important policy questions that cannot be answered without these linkages. Expanding P20 WIN will enhance the State’s collective ability to improve programs, practices and policies for the benefit of the individuals we serve.

Participating Agencies will be able to:
- Provide input into the vision for P20 WIN
- Join their data with the data of other participating agencies as allowed by state and federal law
- Participate in the P20 WIN Data Governance process.
- Request linked data as allowable by law and data sharing agreements
- Utilize P20 WIN to inform policies and other key initiatives.

\[1\] Only Participating Agencies that have legal authority under state law and FERPA or their Authorized Representatives will be allowed to utilize P20 WIN data for audit or evaluations of their education programs.
10.3 Limitations of being a Participating Agency

Participating Agencies are not required to be public organizations; however, current state law prohibits non-public staff or organizations from receiving unit record wage data from the State Department of Labor. This means that only authorized public agency staff with legitimate interests can receive unit record wage data through P20 WIN. Non-public entities may receive wage record data only after it has been aggregated to the satisfaction of the P20 WIN Data Governing Board.

10.4 How to Join P20 WIN

An agency or organization that would like to become a participant in P20 WIN must go through a review and recommendation process by the Data Governing Board, and Data Governing Board recommendations must be approved by the Executive Committee before the entity may join. An entity interested in joining will go through the following process.

1. Provide to the P20 WIN Program Manager a formal written request from the chief executive of the interested organization that requests inclusion into P20 WIN. The request should clearly articulate what data will be contributed to P20 WIN, what funding is available for ongoing system support and how the addition of this data supports the P20 WIN vision. In its consideration of the request, the Governing Board may request additional information as needed.

2. If the applicant is not a public agency, the P20 WIN Manager shall consult with the Office of the Attorney General’s Department of Health and Education about the formal request.

3. The Data Governing Board reviews the request for inclusion, determines whether to proceed or deny the request, and communicates this decision to the chief executive of the interested organization.

4. If invited, representatives of the interested organization attend a P20 WIN Data Governing Board meeting to discuss joining and develop a potential cost-sharing agreement.

5. The Data Governing Board shares the potential cost-sharing agreement with the State Attorney General’s Office and makes a combined recommendation to the P20 WIN Executive Board for consideration.

6. The P20 WIN Executive Board approves or denies the request and that determination is provided in writing to the chief executive of the interested organization.

7. If approved, the leadership of the interested organization will agree to the P20 WIN policies and procedures including, but not limited to, the P20 WIN Data Governance Policy, the P20 WIN Data Request Management Process, the P20 WIN Data Governance Manual and the MOA’s between existing participating agencies that enable movement of data.

8. Unanimous agreement to include a new organization in P20 WIN will be demonstrated by having the chief executives of each existing Participating Agency and the newly approved organization sign the P20 WIN Data Governance Policy.

9. The approved organization drafts and obtains signatures on an MOA to enable the movement of data between their data source and the agency conducting the data match.
10. The approved organization drafts and executes a cost-sharing statement that articulates how it will share in the cost of maintaining and/or enhancing the system.

11. The approved organization designates representatives for the P20 WIN Executive Board, Data Governing Board and Data Steward Committee and provides names and contact information to the P20 WIN Program Manager.

12. The approved organization complies with the technical requirements for establishing a remote server if necessary.

13. The approved organization works with system administrators from the participating agencies to configure hardware, software and map data elements to the system if necessary.

10.5 Technical Requirements for Joining P20 WIN

In order for an agency or organization to participate in P20 WIN, the joining entity may need to meet technical requirements more detailed than those identified in this section. The P20 Program Manager will supply documentation if necessary. Basic requirements for approved data requests that require the participating organization’s data include, but are not limited to the following:

1. The participating organization must be able to create data files for matching data that comply with the P20 WIN Data Request Procedure.

2. The participating organization must be able to create data files with data fields requested for audits and evaluations that comply with the P20 WIN Data Request Procedure.

3. The participating organization must be able to send and receive data files securely as required by memoranda of understanding for approved data requests.

4. The participating organization must be able to monitor and maintain the quality of its source system data.

10.6 Criteria for Inclusion

The P20 WIN Data Governing Board, Office of the Attorney General and P20 WIN Executive Board will consider each formal request for inclusion based upon criteria that include but are not limited to the following factors:

- The interested organization’s participation is consistent with state and federal law.
- The interested organization’s participation furthers legitimate public interests.
- The interested organization can contribute unit record data to P20 WIN which will further Participating Agencies’ ability to conduct audits and evaluations of state- or federal-supported education programs.
- The interested organization is allowed to share unit record data through P20 WIN according to state and federal law.
- The interested organization has financial resources to support their share of the maintenance and operational costs for a minimum of 2 years.
10.7 Executive Approval

As members of the Executive Board for P20 WIN, we approve this procedure which becomes effective as of the later of the dates noted below.

Board of Regents for Higher Education:
Name: Dr. Gregory W. Gray
Title: President
Signature: [Signature]
Date Signed: 10/17/14

Connecticut State Department of Education:
Name: Stefan Pryor
Title: Commissioner
Signature: [Signature]
Date Signed: 11/5/14

Department of Labor:
Name: Dennis Murphy
Title: Deputy Commissioner
Signature: [Signature]
Date Signed: 12/01/15

Connecticut Independent College and University Institute for Research and Public Service
Name: Judith Greiman
Title: President
Signature: [Signature]
Date Signed: 11/14/14