April 2, 2014

Committee on Education and the Workforce
US House of Representatives
2181 Rayburn House Office Building
Washington, DC 20515-6100

Dear House Committee on Education and the Workforce Committee:

Thank you for reaching out to the Data Quality Campaign (DQC) to provide feedback on proposed changes to the Education Sciences Reform Act (ESRA) as it undergoes reauthorization. DQC offers the following background and policy recommendations with the aim of better utilizing data to improve student achievement while strengthening safeguards for students' personal information. We stand ready to provide you and your staff with additional information to inform a successful reauthorization of ESRA.

The Data Quality Campaign

The Data Quality Campaign (DQC) supports policymakers at the state and federal level and other key leaders in promoting the effective use of data to improve student achievement. We envision an education system in which all stakeholders—from parents to policymakers—are empowered with high-quality data to make decisions that ensure every student graduates high school prepared for success in college and the workplace. This letter will suggest ways to reduce burden on states while ensuring that essential data is collected, reported, and used; promote transparency and data accessibility; break down silos; build capacity of stakeholders to use data; ensure privacy, security, and confidentiality of data; and serve as a catalyst for building, maintaining, and innovating data infrastructure.

Without quality data, our nation's efforts to improve student achievement and system performance will fail. States have made great progress in building their infrastructure to collect student-level longitudinal data. Federal policy should stop approaching these systems as distinct compliance-focused efforts and instead build the capacity of states to use data to improve transparency, measure return on investment, inform accountability, offer feedback, inform continuous improvement *within and across* these systems, and most importantly pivot to a culture of data use, now that they have already made significant investments in infrastructure.

In the following paragraphs, DQC responds to a list of questions raised by the House Committee on Education and Workforce as it prepares to propose ESRA reauthorization.

What is your opinion on the switch from funding the creation of data systems to encouraging their use?

The US Department of Education has issued grants to states under the State Longitudinal Data System program since 2005. When states first began the creation of their data systems, prior to the first Department of Education grants, the Data Quality Campaign measured whether or not states included 10 elements essential to the creation of an effective data system. In 2009, every state committed to implementing the 12 America COMPETES Elements—which include DQC's 10 Essential Elements—and to publicly report this information. Now that states have successfully built their data systems, which collect quality data beyond test scores, DQC has pivoted to highlighting the 10 actions states must take to ensure the effective use of data by education stakeholders.

DQC encourages the ESRA proposal take the same approach to SLDS, moving its focus away from the components that data systems must include and toward how the data can be used to improve decision making, provide transparency and inform richer accountability systems. This is a necessary step on the path to effective use of education data. This pivot will permit states to use federal funds to turn their attention to the important task of transforming the data they now collect into actionable information and ensuring that key stakeholders have access to this tailored, timely, contextual information. DQC believes this will lead to a greater focus on using the right data to answer the right questions to improve student success. States must continue to shift their perception the ways data can be used in their work, from only thinking about data in terms of measuring compliance to using data effectively to inform decision-making, among federal and state policymakers, in school districts and classrooms, and by parents at home. If this shift is made in ESRA, states will be empowered to increase their focus on how to effectively use data to improve student achievement.

What is your opinion on ensuring states link K-12 data systems to early childhood education, postsecondary education, and workforce data?

DQC sees immense value in the ability to link data across early childhood education, K-12, postsecondary, and workforce systems. The most pressing questions for education stakeholders (alignment, feedback, etc) require data to be shared from disparate data collections, which means that it is vital align these systems in order to effectively answer these questions.

By linking data systems across the P–20/workforce spectrum, states will gain the ability to evaluate whether students, schools, and districts are meeting their college- and career-readiness expectations. According to DQC's 2013 *Data or Action* survey, 43 states matched K-12 and early childhood data annually, 44 states match K-12 and postsecondary data annually, and 19 states match K-12 and workforce. Currently, only 18 states make the linkages between all four data systems.

We are currently limited in our ability to access this data due to the data sharing barriers among state agencies. State Longitudinal Data System grants should incent cross state data sharing. An important step to implementing cross agency data sharing is incentivizing the of the creation of P-20W governance systems which ensures that there is transparency and accountability for which questions will be prioritized, which limited data will be collected, how this data will be kept secure and confidential, and determining who has access to which it and in which formats. Promoting thelinking data across systems by requiring it of SLDS grantees will help ensure that many more states are able to answer the most important questions for all stakeholders involved.

What is your opinion of giving states the flexibility to subgrant funds to local educational agencies to enable them to improve their data systems?

DQC supports efforts to strengthen collaboration between state and local data systems. Because data have traditionally been collected for compliance purposes, they are often collected, stored, and maintained in systems defined by funding streams. Giving states an opportunity to improve collaboration between states and local education agencies and align education data system to support stakeholder's effective use of data is an excellent way to increase collaboration between state level agencies and local education agencies.

What is your opinion of prioritizing state applications that demonstrate the capacity to share teacher and school leader performance data with local educational agencies and preparation programs?

In order to ensure that educator preparation programs are successfully preparing teachers for the reality of the classroom ,policymakers, taxpayers, program applicants and the programs themselves need to know how teachers impacting student learning in the classroom. Currently, only 17 states share teacher performance data with educator preparation programs, providing them the vial data they need to improve their programs.

Receiving data on performance from local education agencies will increase transparency of the effectiveness of educator preparation programs and allow the programs to make decisions about instruction.

What is your opinion on provisions to protect individually identifiable data, and strengthen data privacy and confidentiality?

Secure, *appropriate*, and *ethical* use of data is critical to the effective, meaningful use of data—and policies, practices, and communications must reflect the moral and legal responsibility to protect data. In doing so, policymakers will ensure the privacy and confidentiality of students' personally identifiable information, mitigate risks related to the intentional and unintentional misuse of data, and ensure

clarity of roles and responsibilities around data use. Ultimately, DQC believes that changing the conversation and building trust at all levels is the root to ensuring that data can be used effectively; without trust in the data itself, no one will use it.

At this time, 32 states have introduced education data privacy legislation so far this session, and DQC has shared recommendations for the foundational components of these laws, including the creation of strategies for promoting transparency and public knowledge. Maintaining the status quo of the existing federal laws on which these states have based their targeted state laws is extremely important to allowing states to craft laws which meet the unique privacy concerns of their citizens.

What is your opinion on the required report to examine the implementation and effectiveness of the SLDS program?

As with all data collections, a report to examine the implementation and effectiveness of the SLDS program must start with the right questions in order to ensure that the report focuses on how data can be effectively used by the appropriate stakeholders. It is vital that this report not become simply another compliance check to ensure that funds were granted to states, but rather a tool to provide additional data on the effectiveness of the program.

We look forward to continuing the conversation around supporting the effective use of data to improve student achievement through the reauthorization of the Educational Sciences Reform Act, as well as towards future reauthorizations of ESRA which will continue to build on this new foundation with the addition of important topics like data literacy, data governance, and public reporting.

Sincerely,

Kristin Yochum
Director, Federal Policy
Data Quality Campaign