

**Background information for the 11-2-2022 C2C Governing Board meeting about existing processes related to defining and potentially adding data points in the P20W data set:**

In the legislation that created the C2C system, it describes the minimum data submission from the data providers:

10871. (a) (1) and (2) states that the data providers shall contribute to the data system, at least annually, the data points contained in the P20W data set that each data provider agrees to contribute under the terms of its participation agreement with the managing entity; and that source data shall be consistent with data definitions and standards adopted by the governing board.

Each of the data providers and the Office of Cradle-to-Career Data has signed the Participation Agreement, which is the legal framework used by the state to establish the conditions under which data may be shared and used for the P20W data set. The agreement includes Exhibits 2A and 2B that summarize the data points that were identified during the planning process and which entity is providing each data point.

The Participation Agreement also notes that:

6.1.1.5 The data elements in Exhibits 2A and 2B may be modified by each Data Provider and the Managing Entity to include additional elements by the Data Provider without the need to re-execute this agreement. The Governing Board may add or remove requested data points based on changes in the usage of the element. If vetted through the Governing Board for a legitimate public purpose, data elements in Exhibits 2A and 2B may be eliminated or reassigned to another Data Provider.

In the Governance Manual, it states that the Governing Board reviews recommendations for additional data as part of the strategic planning process. All recommendations for additional data would require a feasibility study conducted by the Office. The Office would work with the relevant data providers and experts to document data availability, reliability, and validity; legal requirements; startup and ongoing costs to the Office and to the data providers; potential approaches for collecting the information; and any political or other implications that would jeopardize the neutrality of the Office.

This is based on specific portions of the C2C legislation, which notes that the Governing Board is responsible for:

10866 (b)(4) Expanding the collected data set, beyond the P20W data set, by doing both of the following:  
(A) Approving additional data providers.

(B) Requesting additional data points from data providers, in the context of data quality, legal concerns, costs, and preserving the neutrality of the data system. The governing board shall not require a data provider to collect data that the data provider is not legally allowed, under other applicable laws, to collect.

10867(b)(i) notes that the Office is charged with supporting the governing board, advisory boards, and data providers by providing analysis and recommendations regarding data points.

Finally, in the Governance Manual, it notes that the Data & Tools Advisory Board develops recommendations for which data points to include in centralized data sets. However, it is up to each data provider whether they elect to include or gather that information.

While there is significant information in legislation, legal documents, and the Governance Manual about how new data points get evaluated, C2C does not yet have a policy for the process for documenting the new data points that would be added.