

Cradle-to-Career Data Governing Board Staff Report

Date Report Issued: November 5, 2025
Attention: Members of Cradle-to-Career Data Governing Board
Subject: **Update On Parental Education Level and Labor and Workforce Development Agency Data Elements in the P20W Dataset (Agenda Item Nine)**
Staff Contact: Ryan Estrellado, Director of Data Programs

At this meeting, the Governing Board (Board) will receive an informational update about the inclusion of Parental Education Level in the P20W Data System. The Board will also receive an update on Labor and Workforce Development Agency (LWDA) data elements in the P20W Data System, and will have an opportunity to vote on a recommended course of action.

Requested Action:

There is no requested action on the Parental Education Level data element.

For the LWDA data elements, the Office of Cradle-to-Career Data (Office) recommends the Board consider the proposed changes described in this staff report to the data elements collected from the California Workforce Development Board (CWDB), the Department of Industrial Relations Division of Apprenticeship Standards (DIR-DAS), the Employment Development Department (EDD), and the Employment Training Panel (ETP) (hereinafter referred to as “the LWDA Data Providers”). These changes include the addition, removal, and clarification of several data elements that will improve Cradle-to-Career Data’s (C2C) ability to link records and accurately describe workforce experiences and outcomes.

- ❖ Move to approve that the Office add, remove, and clarify the C2C Participation Agreement workforce data elements described in Exhibit A of the related resolution and approve the related resolution.

Parental Education Level:

Background:

At the November 14, 2025 Board meeting, the Office will provide the Board with an informational update on the Parental Education Level data element.

This agenda item is a follow up to the [Changes to Data Points in the P20W Data Set](#) agenda item from the February 28, 2024 Board meeting, [Update on CDE Data Points](#) agenda item from the May 1, 2024 Board meeting, and [Update on College Assessment and Parental Education Level](#) agenda item from the August 15, 2025 Board meeting. At the August 15, 2025 Board meeting, the Board asked the Office to pursue the feasibility of including two data elements from the California Department of Education (CDE) in the P20W dataset: Socioeconomic Status (SES) and Parental Education Level. For context, Education Code Section 10856(b)(1) (repealed 2024) states: At a minimum, the workgroup shall examine how the data system could have the capacity to do both of the following: (1) Disaggregate data by race, ethnicity, region, gender, military status, parents' education, and age.

Analysis:

The Office partnered with WestEd and the Data Integration Support Center (DISC) to investigate the following:

- ❖ Technical Solutions: Whether data sharing agreements or technical controls could allow C2C to receive both data elements while preventing the identification of Free and Reduced Price Meal (FRPM) status through deduction
- ❖ National Practices: Whether other states' statewide longitudinal data systems' include both SES indicators and parental education data
- ❖ Privacy Safeguards: What specific methods other states employ to ensure the protection of FRPM data while providing comprehensive demographic data for research purposes

DISC's analysis can be found in Attachment A of this staff report.

Conclusion:

In alignment with the report from DISC, the Office recommends that SES continue to be included in the P20W dataset and requested from CDE. The Office does not recommend receiving Parental Education Level from CDE at this time.

LWDA Data Elements:

Background:

At the November 14, 2025 Board meeting, the Office will provide the Board with an update on data elements provided by the LWDA Data Providers. The Board may choose to take action to clarify data elements that are included in the C2C Participation Agreement.

This agenda item is a follow up to the [Update from Workforce Data Task Force and Possible Action on the Addition of Data Providers and Inclusion of New Data Points in the P20W Dataset](#) agenda item from the May 9, 2025 Board meeting.

With support from WestEd, the Office engaged with the LWDA Data Providers' technical staff to complete the file upload specification (file spec) documents, to prepare for the first submission of workforce data to the P20W dataset in March 2026. The LWDA Data Providers are the California Workforce Development Board (CWDB), the Department of Industrial Relations Division of Apprenticeship Standards (DIR-DAS), the Employment Development Department (EDD), and the Employment Training Panel (ETP).

During the file spec meetings, the Office discovered that some data elements from the workforce Data Providers need to be clarified in the Participation Agreement. These clarifications include but are not limited to:

- ❖ The **addition** of important linking data elements including individual identifiers, which will allow C2C to connect workforce data with wage outcomes, education pathways, and human services participation from other C2C Data Providers

- ❖ The **removal** of data elements that specific LWDA Data Providers do not collect
- ❖ The **clarification** of workforce experience data elements to more accurately reflect the different types of programs, services, and trainings offered by the four unique LWDA Data Providers

Recommendation:

The Office and WestEd reviewed these proposed changes with LWDA leadership to confirm that these changes will better enable C2C to accurately describe workforce experiences and outcomes in its planned analytic tools. A complete list of the proposed changes is presented below.

Workforce Data Elements by LWDA Data Provider

Recommended Changes: ,

Data Element	EDD	CWDB	ETP	DIR- DAS
Data Elements for Matching Purposes Only				
First Name	x	x	x	x
Last Name	x	x	x	x
Social Security Number	x	X	X	x
State Identification Number				

Data Element	EDD	CWDB	ETP	DIR- DAS
Program Identification Number				X
Data Provider-Specific Individual Identifiers	X	X	X	X
Participant Information				
Date of Birth	X	X		X
Age Group			X	
Race	X	X	X	X
Ethnicity	X	X	X	X
Gender/Sex	X	X	X	X
Disability	X	X		X
Veteran Status	X	X	X	X
Sexual Orientation	X	X	X	X

Data Element	EDD	CWDB	ETP	DIR- DAS
Participant Zip Code	X	X		X
Employer Zip Code			X	X
Education Level at Point of Enrollment	X	X	X	X
Trainee Type			X	
Household/ Family Size		X		X
Single Parent	X	X		
Foster Youth	X	X		X
Homeless Status	X	X		X
Justice involved	X	X	X	
Low income	X	X		

Data Element	EDD	CWDB	ETP	DIR- DAS
Services				
Program Information	X	X		X
Service Type	X	X		X
Training or Approval Type		Reflected in Program Information	X	X
Supportive Services Type	X	Reflected in Program Information		
Mode of Instruction			X	X
Service or Training Start Date	X	X	X	X
Service or Training End Date	X	X	X	X
Service or Training Provider		X		X
Zip Code for Training Provider				X

Data Element	EDD	CWDB	ETP	DIR- DAS
Occupation for Training	x	x		x
Industry for Training			x	x
Outcomes				
Training Completion	x	x	Reflected in Training End Date	x
Measurable Skill Gain	x			x
Workforce Credential Attainment	x	x		x
Employer				
2nd Quarter Occupation of Employment				
4th Quarter Occupation of Employment				
2nd Quarter Industry for Employment	x			

Data Element	EDD	CWDB	ETP	DIR- DAS
4th Quarter Industry for Employment	x			
2nd Quarter Quarterly Earnings	Using Participant SSN from each LWDA Data Provider, C2C will receive earnings data directly from EDD through our existing wage response match			
4th Quarter Quarterly Earnings				

Context for the Related Resolution in Attachment B and Exhibit A:

Because action taken at a Board meeting does not have a formal record until the minutes are adopted at the following meeting, in cases of changes to the P20W data set, the Office is providing a proposed resolution, which can immediately document the action taken by the Board. That resolution then provides the record of action taken for the Office to use to update documentation about the P20W data set or data transfers, without needing to wait for the adoption of the meeting minutes at the next quarterly meeting of the Board.

TO: Office of Cradle-to-Career Data
FROM: Data Integration Support Center
DATE: October 10, 2025
RE: Analysis of Options for Parental Education Level Data Element

Summary

The Data Integration Support Center (DISC), serving as C2C's subject matter expert on data integration and privacy compliance, has conducted a thorough analysis of the Cradle-to-Career Governing Board's (Board) questions regarding the removal of Parental Education Level from the P20W data set. This analysis was prompted by the California Department of Education's (CDE) legal determination that providing both parental education and Socioeconomically Disadvantaged (SES) status would enable identification of Free and Reduced-Price Meal (FRPM) participants through logical deduction, thereby violating federal privacy protections.

The Board specifically requested DISC to investigate: (1) whether technical or administrative solutions could allow receipt of both data points while preventing FRPM identification, (2) how other states' longitudinal data systems handle this challenge, and (3) what privacy safeguards enable states to maintain FRPM security while providing comprehensive demographic data. Our analysis draws from national statewide longitudinal data system (SLDS) best practices, federal privacy requirements, and a review of peer state approaches to this common challenge.

Analysis of Options

1. Technical/Administrative Solutions

Finding: No viable solution exists to receive both data points (parental education and socioeconomic status) while preventing Free and Reduced-Price Meal (FRPM) identification.

Technical or administrative controls cannot eliminate the deduction risk when both data elements are present in the same system. Key considerations include:

- **Legal Sufficiency:** CDE's legal determination (8/15/25) is based on federal requirements in the National School Lunch Act that prohibit indirect disclosure of FRPM status. Administrative agreements or technical controls do not override these federal protections.
- **Critical Partner Relationships:** Generally speaking, requesting data elements despite a data partner's legal analysis could negatively impact critical partnership and data sharing relationships.
- **Data Governance Best Practices:** CDE's position aligns with purpose limitation principles—data collected for nutrition program eligibility should not be repurposed for broader research without explicit authorization.

- **Administrative Complexity:** Managing different access rules and restrictions for various data elements would create significant administrative burden for C2C staff and increase the risk of inadvertent disclosure.
- **Data Quality Considerations:** CDE's parental education data is a less robust measure as it is optionally self-reported on FRPM eligibility forms with up to 15% of values missing. CDE's SES status is almost universally populated across all students, because the composite metric is inclusive of a number of measures providing complete coverage for analysis and ensuring no students are excluded.
- **Data Utility Considerations:** SES status provides greater analytical value as it captures multiple dimensions of disadvantage (parental education, FRPM, homelessness, foster care, and migrant status) in a single comprehensive measure that aligns with CDE's official reporting metrics, ensuring consistency across partner's reporting and directly supports C2C's planned dashboards.

2. National Practices

Finding: No examples were found of other states' SLDS reporting parental education status. SLDSs universally prioritize protecting the confidentiality of FRPM status often using alternative economic disadvantage measures to avoid direct FRPM disclosure.

- **Proxy Measures:** Free and reduced-price meal eligibility has historically served as a proxy for individual student and family socioeconomic status. Following Every Student Succeeds Act (ESSA) requirements, many state education agencies developed their own measures of economic disadvantage to protect sensitive FRPM data while meeting federal reporting needs. While FRPM and SES are often used interchangeably ¹, states' SES measures are typically composite indicators that may include FRPM among other factors, allowing them to report economic disadvantage without directly revealing meal program participation.
- **Economic Disadvantage Reporting Patterns:** Many states report student economic disadvantage indicators. Michigan's SLDS publishes several reports on the "[Economically Disadvantaged](#)" student subgroup through [MI School Data](#). Wisconsin's [WISEdash Public Portal](#) provides information on "[Economic status](#)" without parental education. [Minnesota's SLEDS](#) includes an "[Economic Status Indicator](#)" that incorporates FRPM status. [Connecticut's DataLinkCT](#) receives students' FRPM eligibility from their State Department of Education, though the level of public reporting using this data remains unclear. [Georgia's GA-AWARDS](#) receives an "FRPL Indicator" from their state education agency but displays only "Economic Status" in [public dashboards](#). Kentucky's KYSTATS explicitly reports "Eligible for free/reduced lunch" from the Kentucky Department of Education in their [high](#)

¹ National Forum on Education Statistics. (2015). [Forum Guide to Alternative Measures of Socioeconomic Status in Education Data Systems](#). (NFES 2015-158). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

[school feedback reports](#)—however, they require specific waivers and certification that requesting agencies meet provisions of the Richard B. Russell National School Lunch Act.

- **Still Limited in Early Childhood Systems:** Parental education data appears primarily in Early Childhood Integrated Data Systems, though coverage remains limited. According to findings from the [2018 Early Childhood Data Systems Survey final report](#) show only 14 states link data about a child's family which *may* include family education data. [Minnesota's Early Childhood Education Data System](#) collects [parent education levels](#) (ranging from "less than HS" to "college degree or more") separate from their SLDS.

3. Privacy Safeguards in Other States

Finding: States protect FRPM data by not sharing it directly.

Families provide sensitive financial information with the explicit understanding it will be used solely for determining meal program eligibility, and breaching this trust undermines confidence in government programs. Federal law recognizes this unique sensitivity by imposing stricter protections than FERPA and establishing criminal penalties—including fines and imprisonment—for unauthorized disclosure² of meal program information.

Best practices for maintaining FRPM privacy typically include:

- **Use Alternative Measures:** Provide socioeconomic disadvantage indicators rather than raw FRPM eligibility. These composite measures mask individual program participation while still identifying students needing additional support based on economic disadvantage.
- **Purpose Limitation:** Strictly adhere to collecting and using data only for its intended purpose. FRPM data collected for meal programs remains siloed from broader educational research databases.
- **Aggregation Only:** Limit certain demographic combinations to aggregate reporting only, with cell suppression rules that prevent identification of small groups.
- **Technical Safeguards:** Implement role-based access controls, audit logs, and data segmentation to ensure even authorized users cannot inadvertently identify FRPM participants through data combinations.

Recommendations

1. **Honor Data Provider's Legal Determination:** C2C should defer to the Data Provider's legal analysis of federal requirements for protecting their data, to maintain trust and partnership with a foundational K-12 data provider.

² [Exhibit 2–7: A Summary of Disclosure of School Lunch Information from National Forum on Education Statistics. Forum Guide to Protecting the Privacy of Student Information: State and Local Education Agencies](#), NCES 2004–330. Washington, DC: 2004

- 2. Prioritize SES Status:** The evidence supports continuing to receive SES data from CDE rather than parental education. The SES indicator serves immediate analytical needs more comprehensively, capturing multiple dimensions of disadvantage including economic status, parental education, homelessness, foster care, and migrant status. This single measure provides robust data for equity-focused analysis while maintaining alignment with state and federal reporting requirements that stakeholders expect.
- 3. Establish a Formal Review Cycle:** This constraint should not be considered permanent. A formal review should be scheduled in 3-5 years when conditions may be more favorable for revisiting this data element. By that time, C2C will have matured as an organization with established operations and stronger technical capabilities, federal guidance may have evolved to provide clearer pathways for data sharing, and other states may have developed tested alternatives. Including this review in the formal data governance calendar ensures appropriate resources and attention will be allocated to reassess the feasibility of obtaining parental education data.
- 4. Strengthen Data Governance Practices:** C2C must demonstrate exemplary data governance to maintain stakeholder trust and partner confidence. This includes strict adherence to purpose limitation principles—using data only for intended purposes—and ensuring all data practices align with federal and state privacy requirements. Thorough documentation of decision-making processes and rationales will prove essential for both current operations and future reviews. These practices not only ensure compliance but also position C2C as a responsible steward of sensitive educational data.

Conclusion

While the Board's interest in obtaining parental education data is well-founded given its research value, current federal privacy requirements and practical considerations make receiving both data elements from CDE infeasible. DISC's analysis confirms that no technical or administrative solution can reconcile the competing demands of receiving both parental education and SES data while maintaining federal FRPM privacy protections.

By maintaining SES status as the primary equity indicator, C2C preserves its ability to identify and analyze outcomes for disadvantaged students using a comprehensive, multi-dimensional measure that aligns with state reporting standards. The recommended review cycle acknowledges that this limitation need not be permanent, allowing C2C to revisit this decision as the organization matures and the regulatory landscape evolves.

This approach reflects data governance best practices observed across successful state longitudinal data systems: respecting the authority of data providers, adhering to purpose limitation principles, and building trust through demonstrated compliance. While the loss of parental education data represents an analytical limitation, the alternative could fundamentally undermine C2C's mission to improve educational outcomes through responsible data use.

RESOLUTION NO. 25-06
APPROVAL OF CHANGES TO THE APPROVED DATA ELEMENTS
PROVIDED BY THE LABOR WORKFORCE AND DEVELOPMENT AGENCY
NOVEMBER 14, 2025

WHEREAS, the Office of Cradle-to-Career Data (C2C) is established pursuant to Education Code section 10862 to serve as a neutral administrative body of the California Cradle-to-Career Data System to establish and maintain a longitudinal data system that provides a source for actionable data and research on education, economic, and health outcomes for individuals, families, and communities, and provide for expanded access to tools and services that support the navigation of the education-to-employment pipeline, and under the direction of the Governing Board established pursuant to Education Code section 10864;

WHEREAS, C2C's authorizing statute establishes certain entities as data providers and Education Code section 10866(b)(4)(A) authorizes the Governing Board to add additional data providers;

WHEREAS, Education Code section 10861(l) provides for C2C to develop a participation agreement that establishes the framework for the use and exchange of data between partner entities, data providers, and C2C;

WHEREAS, Education Code section 10866(b)(4)(B) authorizes the Governing Board to request additional data points from data providers for addition to the P20W data set;

WHEREAS, on May 9, 2025, the Governing Board approved additional data points to be provided by the Employment Development Department, and Department of Industrial Relations Division of Apprenticeship Standards; as well as the Employment Training Panel and the California Workforce Development

Board, state entities housed within the Labor Workforce Development Agency (LWDA); and

WHEREAS, following that approval, C2C staff and LWDA worked to incorporate the additional data points and discovered that additional changes needed to be made to the approved data points;

NOW, THEREFORE, BE IT RESOLVED by the Governing Board of the Cradle-to-Career Data System as follows:

1. The data points for the Employment Development Department and the Department of Industrial Relations; as well as the LWDA entities (Employment Training Panel and California Workforce Development Board) as modified in Exhibit A to this resolution are approved for inclusion into the P20W data set.

CERTIFICATE OF THE EXECUTIVE DIRECTOR
(Attesting to Action of the Authority)
Sacramento, California

I, Mary Ann Bates, Executive Director of the Cradle-to-Career Data System, hereby certify that the foregoing is a full, true, and correct copy of Resolution No. 25-06, **APPROVAL OF CHANGES TO THE APPROVED DATA ELEMENTS PROVIDED BY THE LABOR WORKFORCE AND DEVELOPMENT AGENCY**, as adopted at a meeting of the Cradle-to-Career Data System held at 400 R Street, Sacramento, California 95811, on November 14, 2025, for which meeting all of the members of said Authority had due notice; and that at the meeting the staff recommendation was adopted by the following votes:

AYES:

NOES:

ABSTAINS:

ABSENT:

This resolution expires one year after the adoption date. Extensions must be approved by the Authority in a public meeting.

I further certify that the original minutes of said meeting and a copy of the original Resolution adopted at said meeting are on file in the Office of Cradle-to-Career Data; and that the Resolution has not been amended, modified, or rescinded in any manner since the date of its adoption, and the same is now in full force and effect.

IN WITNESS WHEREOF, I have executed this certificate.

By:

Mary Ann Bates, Executive Director

Date



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Exhibit A

Exhibit A: Workforce Data Elements by LWDA Data Provider

Recommended Changes:

Data Element	EDD	CWDB	ETP	DIR- DAS
Data Elements for Matching Purposes Only				
First Name	X	X	X	X
Last Name	X	X	X	X
Social Security Number	X	X	X	X
State Identification Number				
Program Identification Number				X
Data Provider-Specific Individual Identifiers	X	X	X	X
Participant Information				
Date of Birth	X	X		X

Exhibit A

Data Element	EDD	CWDB	ETP	DIR- DAS
Age Group			X	
Race	X	X	X	X
Ethnicity	X	X	X	X
Gender/Sex	X	X	X	X
Disability	X	X		X
Veteran Status	X	X	X	X
Sexual Orientation	X	X	X	X
Participant Zip Code	X	X		X
Employer Zip Code			X	X
Education Level at Point of Enrollment	X	X	X	X
Trainee Type			X	

Exhibit A

Data Element	EDD	CWDB	ETP	DIR- DAS
Household/ Family Size		X		X
Single Parent	X	X		
Foster Youth	X	X		X
Homeless Status	X	X		X
Justice involved	X	X	X	
Low income	X	X		
Services				
Program Information	X	X		X
Service Type	X	X		X
Training or Approval Type		Reflected in Program Information	X	X
Supportive Services Type	X	Reflected in Program Information		

Exhibit A

Data Element	EDD	CWDB	ETP	DIR- DAS
Mode of Instruction			X	X
Service or Training Start Date	X	X	X	X
Service or Training End Date	X	X	X	X
Service or Training Provider		X		X
Zip Code for Training Provider				X
Occupation for Training	X	X		X
Industry for Training			X	X
Outcomes				
Training Completion	X	X	Reflected in Training End Date	X
Measurable Skill Gain	X			X

Exhibit A

Data Element	EDD	CWDB	ETP	DIR- DAS
Workforce Credential Attainment	x	x		x
Employer				
2nd Quarter Occupation of Employment				
4th Quarter Occupation of Employment				
2nd Quarter Industry for Employment	x			
4th Quarter Industry for Employment	x			
2nd Quarter Quarterly Earnings	Using Participant SSN from each LWDA Data Provider, C2C will receive earnings data directly from EDD through our existing wage response match			
4th Quarter Quarterly Earnings				