

Proposed Language for the Data Point Request Policy

Approving Data Points

Per legislation, the Governing Board ~~is responsible for expanding the collected data set~~ ~~by may requesting~~ additional data points from data providers, in the context of data quality, legal concerns, costs, and preserving the neutrality of the data system. However, the Governing Board may not ~~require request that~~ a data provider ~~to~~ collect data that the data provider is not legally allowed, under other applicable laws, to collect.¹ Per Education Code 10861 and applicable federal law, data providers shall retain sole control over their source data and may reject, add, or remove data elements requested by the Governing Board.

The Participation Agreement that was signed by all of the data providers notes that the data elements provided may be modified by data providers and the Office to include additional elements without the need to re-execute the Participation Agreement. The Governing Board may ~~request the addition or deletion of~~ ~~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 ~~and approved by the applicable data providers~~, data elements may be eliminated ~~or reassigned to~~ provided by another data provider.²

Nothing in the Governance Manual may supersede the Participation Agreement, and the Governing Board may not require a data provider to amend the data points that it provides.³

Scenario 1: Data provider requests to share a data point it already collects and validates:

1. A data provider and the Office explore an additional data point that is needed for a dashboard or other purpose at C2C. Discussion will include:
 - a. Clarifying data definitions and updates to data definition document

¹ AB 132 10866 (b)(4) E

² Section 6.1.1.5

³ Section 6.1.1.3

- b. Mapping the data definition to fields in the data provider's dataset
 - c. **Legal review regarding the proposed use of the data.**
2. The Director of Data Programs or a designated alternate collaborates with the data provider on data definitions and data transfer.
3. The data provider, Governing Board member (or authorized person), and the Executive Director confirm agreed requested changes in writing (such as an email).
4. The Office presents requested changes at the next Governing Board meeting. There are two paths:
 - a. *Formal additions to the P20W:* For newly shared data points that the Governing Board wishes to formalize as data points that will be submitted to the Office on an ongoing basis as part of the P20W data set, the Governing Board discusses and formally votes to include those data points in the defined list of P20W data points moving forward.
 - b. *Additional data points:* Data providers also have the option to share data points that go beyond the P20W data points for the research request process. Newly available data points will be shared as an FYI item during Governing Board meetings for transparency with the public so researchers understand which data are available through the research request process.
5. The Office circulates an updated list of available data points to all signatories of the Participation Agreement as a courtesy. The Office posts the current list of available data points on the C2C website.

Scenario 2: The Data and Tools Advisory Board requests adding a data point.

The Data and Tools Advisory Board follows the process for vetting in which requests for data points are subject to a feasibility study. For the data points that go to the feasibility study stage:

- Advisory Board recommendations for additional data points are forwarded to the Office for a feasibility study. Office staff work closely with all affected data providers to create a written report that documents the following:
 - data availability, reliability, quality, and validity
 - legal requirements and privacy considerations
 - startup and ongoing costs to the Office and to the data providers

- any political or other implications that would jeopardize the neutrality of the Office
- in separate sections from each of the affected data providers, their determinations on whether it is feasible to provide the data point
- ~~As part of the feasibility study, if the data point is not currently collected and validated by a data provider, local entities that would need to collect and report the new data point to a data provider are given the opportunity to discuss efficient and feasible ways to collect and share the data, as well as the potential challenges of the new data collection.~~
- The Office and representatives from the data providers present the feasibility study results to the Data and Tools Advisory Board. The Data and Tools Advisory Board determines whether to advance the idea to the Governing Board as a proposal.
- The Governing Board discusses the Advisory Board recommendation. If ~~all affected data providers agree to provide the data point, and~~ the Governing Board agrees through a vote, the data point is ~~requested from the applicable data provider~~ ~~approved~~.
- ~~If the request is granted,~~ the Director of Data Programs or designated alternate collaborates with the provider(s) on data definitions and data transfer.
- The Office circulates an updated list of P20W data points to all signatories of the Participation Agreement as a courtesy. The Office posts the current list of available P20W data points on the C2C website.

Scenario 3: In other cases, individuals interested in suggesting a ~~data point~~ tool that they should first contact staff at the Office at info@c2c.ca.gov, which will direct those individuals to the appropriate resource.