

RECOMMENDATIONS TO IMPROVE THE COLLECTION OF PERKINS PLACEMENT DATA IN ALABAMA

Submitted by:

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BACKGROUND

In December 2006, the Office of Vocational and Adult Education (OVAE), U.S. Department of Education, invited state directors of vocational education to submit requests for individualized technical assistance to improve the quality of their CTE accountability systems. In response, the Alabama Department of Education (ADE) submitted an application seeking support to improve the validity of secondary technical skill attainment data and to expand the collection of placement data for secondary and postsecondary CTE concentrators who seek employment, who enroll in postsecondary education or advanced training, or who enroll in the military following program completion.

Following conversations with Sarah Ray, Alabama's Standards & Accountability expert, MPR researchers identified two key areas for technical support:

- *Secondary technical skill attainment*—Alabama currently bases technical skill measurement on end-of-course grades. Several years ago, the state attempted to adopt end-of-course tests, but was unable to complete this work due to funding and other constraints. The state is now working to develop programs of study with the goal of introducing end-of-course exams as new programs are developed. State personnel lack information on how to perform this work and are seeking guidance in building this new assessment system.
- *Secondary placement*—State administrators have devised a web application that requires teachers in local schools to build rosters of students taught in approved CTE subjects. The state includes a Social Security Number (SSN) as part of a student's record profile, and uses this number to match the student with state academic assessments and to determine high school completion. However, SSNs are not used currently to track student placement following high school; instead, teachers are asked to report where students end up after graduating.

To assist the state in improving performance reporting, this paper details strategies for developing technical skill assessments and for instituting administrative record matching using a student's SSN.

SECONDARY TECHNICAL SKILL ATTAINMENT

The 2006 reauthorization of the Carl D. Perkins Career and Technical Education Act (Perkins IV) mandates that states report on the technical skill attainment of students concentrating in CTE coursework. To assist states in preparing for their state plan submission, the Office of Vocational and Adult Education (OVAE) released non-regulatory guidance on student definitions and measurement approaches for each core indicator. This guidance includes descriptions of possible constructions for measure numerators and denominators, along with suggested measurement approaches.

Non-regulatory guidance is based upon recommendations provided by state representatives as part of OVAE's on-going Data Quality Initiative. As part of this effort, OVAE periodically convenes state policy and information system experts to consult on measurement alternatives and their policy implications. States opting to follow the non-regulatory guidance were assured that their measurement approach would be approved by OVAE during state plan review. States proposing differing definitions or measurement approaches were directed to describe how these alternatives would be valid and reliable.

Recognizing that state measurement approaches may need refinement, OVAE is permitting states to reconsider their student definitions or measurement approaches during the 2007–08 transition year. States will need to finalize their measures prior to submitting their final five-year state plan, due in Spring 2008.

Perkins IV requires state secondary and postsecondary agencies to report on student attainment of career and technical skill proficiencies. To support states in crafting measures, OVAE has issued non-regulatory guidance for the construction of the technical skill attainment measure.

Numerator—Number of CTE concentrators who passed technical skill assessments that are aligned with industry-recognized standards, if available and appropriate, during the reporting year.

Denominator—Number of CTE concentrators who took the assessments during the reporting year.

Technical Skill Assessments: Measurement Approaches

During the OVAE-sponsored Data Quality Initiative Institute, held May 18–19, 2007 in Savannah, Georgia, federal staff described three types of reporting approaches. The so-called *Gold Standard* encompasses (1) national skill assessments, developed by third-party agencies; (2) state or national credentialing or licensing exams, typically used to control entry into a profession, or (3) standardized statewide assessments, created by state administrators for local agency use.

The *Silver Standard* applies to state approved, locally developed assessments, in which the state develops formal procedures for reviewing tests developed by secondary teachers or postsecondary faculty, and the *Bronze Standard* applies to grade point average and program

completion. However, OVAE will only permit states to use proxies of skill assessment for an interim period, after which time states will be required to institute some form of technical skill assessment.

Gold Standard 1: National Skill Assessment

A number of third party vendors have developed or are in the process of creating technical skill assessments that can be used for Perkins reporting purposes. To assess state testing options, the OVAE-sponsored Next Step Working Group (NSWG)—comprised of a subset of state CTE directors and data analysts—sponsored a series of conference calls to consult with test developers.

Third party vendors presenting on NSWG calls included representatives of the National Occupational Competency Testing Institute (NOCTI), Ohio State University, SkillsUSA, VTECS, WorkKeys, and XPAND Corporation. State assessment features include:

- *NOCTI*—Has developed exams to assess the technical skills associated with an occupationally specific area. To date, the organization has profiled 87 Job Ready Assessments (e.g., welding, practical nursing) and produced three general workforce readiness exams. NOCTI is also exploring developing pathway level assessments within cluster areas, and has contracted with Connecticut, New York, Pennsylvania, and Virginia to provide customized services to meet state testing needs. For additional information log onto: <http://www.nocti.org>
- *Ohio State University*—The Center on Education and Training for Employment has developed Webxam to administer on-line technical assessments. Modular tests are used to assess a unit of instruction within a program, and full-length tests to assess a program area after students have completed their final course. Tests are delivered on-line, can be accessed 24 hours a day, 7 days a week, and offer score results immediately following test completion. Webxam is primarily an assessment delivery system, meaning that states must still develop or adopt their own assessments; however, Center staff has experience creating workforce assessments and can assist in CTE test design. Webxam is currently used for Ohio’s statewide CTE technical assessment program and to administer some national certification tests. For additional information log onto: <http://www.webxam.org>
- *SkillsUSA*—Is working to align national content standards associated with its skills contests with academic content standards, and to create assessments that document entry-level knowledge and skills required of workers in specific occupations. Students meeting standards will receive a portable, employer-recognized certificate. SkillsUSA is planning to develop content standards for 46 technical areas, with a first set of 6 assessments launched in July 2007. Subsequent plans call for 20 additional assessments to be introduced in 2008 and another 20 in 2009. For additional information log onto: <http://www.skillsusa.org>
- *VTECS*—Is creating a multi-state system to identify, house, validate, and deliver industry-based competencies, standards, item banks, assessments, scenarios, and customized curriculum packages. Information is maintained in VTECS DIRECT 5, a

software database system that allows users to customize CTE competencies, instructional elements, assessment items, and career cluster information for over 80 occupational titles. VTECS is working to develop competencies and standards around which cluster assessments can be developed, and is currently contracting with Arizona to develop a statewide assessment system. For additional information log onto: <http://www.vtecs.org>

- *WorkKeys*—Is designed to assess individuals’ general work readiness skills across a number of dimensions. Assessments exist in ten content areas (e.g., Reading for Information, Applied Mathematics, Business Writing), and are intended to measure basic skills that workers require for the workplace. WorkKeys can be used to assess whether individuals have the abilities needed to succeed in the labor market or in a specific occupational area. To do so, WorkKeys has profiled the skills required for success in any of 10,000 job titles, ranging from accountant to welder. These skill levels have been cross-referenced with WorkKeys skill levels that an individual must have to perform successfully. By comparing occupational job profile data with an individual’s WorkKeys test scores, an educator or employer can reliably predict whether someone has the tools needed for success. For additional information log onto: <http://www.act.org/workkeys>
- *XPAND Corporation*—Provides information technology services to federal, state, and local governments using web-based approaches. Consultants with the company are experienced in the use of industry-based certification, and can work with states to identify appropriate certifications for students enrolled in CTE programs or to develop customized testing products. Since testing is performed via the Internet, XPAND is able to offer cost-effective web-based services that can help control state testing costs. For additional information log onto: <http://www.xpandcorp.com>

There are several advantages to using industry-developed assessments for local use. Because teams of industry and education experts work alongside trained exam developers to structure exam content and organization, occupational assessments generally have high validity and reliability. Test development is also the responsibility of the vendor, meaning that states need not invest resources to update exams to keep pace with industry innovations. Moreover, the state may avoid ongoing administrative costs associated with scoring and reporting results, since contractors typically provide these services as part of the testing fee.

Subcontracting assessments does mean, however, that the state will incur an ongoing, usually per student charge for administering exams. For example, Pennsylvania, which contracts with NOCTI, reimburses districts for up to \$25 per test. In the 2004–2005 program year a total of \$540,000 was spent on student occupational competency assessment. This included expenditures for NOCTI tests and reports, NOCTI benchmarking costs, reimbursement for other approved tests, and regional workshops on occupational testing.

Another consideration is the specificity of third party exams, which, in many cases, focus on specific occupational areas. Since occupationally focused exams are designed to assess skills required of entry-level workers, these assessments are often not useful for assessing foundation level skills associated with a cluster area. Tests may also be too advanced for use at the secondary level, where instruction often focuses on more general skills.

Gold Standard 2: State or National Licensing Exams

In its non-regulatory guidance, OVAE recommended that states identify program areas for which a state has existing technical skill assessments. Recognizing that exams are not available in all areas, OVAE recommended that states detail the program areas for which a state has technical skill exams and the estimated percentage of CTE concentrators that would be reported in the measure. States were also asked to supply a plan and timetable for increasing the coverage of programs and students reported in future program years. Regulatory guidance does not, however, stipulate that states achieve a minimum testing threshold.

To comply with OVAE guidance, Alabama could default to existing credentialing or certification exams administered by state licensing agencies or national industry associations. For example, the state might choose to report on all students who took an assessment developed by the National Institute of Machining Skills, Inc. (NIMS) to assess machining and metalworking. Use of such licensing or certification exams may be most appropriate at the postsecondary level, where students are more likely to acquire the advanced skills needed for marketplace success.

In lieu of endorsing a specific assessment, the state could allow CTE administrators to select their own assessments from a state-identified pool of exams. For example, the Texas Education Agency, the regulatory agency overseeing credentialing, procedural and testing requirements, and instructor qualifications for credential award, has created a guide detailing existing credentials.. Although the state does not endorse any particular certificate or license, the guide is intended to support districts in promoting students' professional development. Educators are encouraged to use the guide, in consultation with local business and industry partners, to determine the types of certifications or licensees that would be most beneficial to students and employers. For additional information log onto: (http://www.tea.state.tx.us/cte/3_13_07TX_CERT_GUIDE_2007.pdf).

While use of industry exams can provide an objective, industry-rated assessment of student skill attainment, states have reported that third party vendors are often unwilling to share exam results. Moreover, because students in some industries do not sit for exams until completing a field apprenticeship that may extend years beyond program completion, such as those pursuing National Automotive Technicians Education Foundation certification, use of national certificates can complicate reporting. Finally, since not all programs have licensure or certifications associated with them, states may be unable to expand their testing programs, as called for in OVAE non-regulatory guidance, by relying solely on these types of exams.

Gold Standard 3: State Developed or Approved Technical Skill Assessments

Alabama could choose to develop its own end-of-course or end-of-program assessments to align with state CTE standards. States embracing this approach have often created a large number of assessments to achieve program coverage. For example, North Carolina has developed roughly 130 end-of-course curricular blueprints and assessments, while Utah, which offers end-of-program assessments, has established 133 occupationally specific exams. In contrast, Kentucky has confined assessments to 19 content areas, in most cases using one exam to address multiple pathways in a career cluster area. For example, the state assessment for the Manufacturing

Career Cluster area encompasses 10 career majors, including welding, machine tool technician, and industrial electronics.¹

Assessment design typically begins with a state establishing CTE standards and competencies within designated program areas. The process usually entails the convening of a committee of state and local CTE administrators, CTE educators, and business and industry representatives. Committee members are tasked with identifying program content standards if none exist, or verifying that existing standards are valid. This may involve surveying or interviewing employers to determine statewide needs, as well as reviewing national and other states' standards systems.

Once CTE competencies are identified and validated, test development begins.² This requires clarifying the type and specificity of assessments, as well as the instrumentation needed to assess student skills (i.e., direct assessment versus scenarios). To inform development, committee members may review existing national assessments that may be appropriate for use in the state. Once test items are identified, draft exams are piloted to assess their validity and reliability.

While creating state exams can increase buy-in among educators, drafting state standards and assessment can be an expensive process. Given the large number of CTE courses or programs that are offered, developing a statewide, occupationally specific testing program can require that a state invest substantial resources in identifying and validating technical skills, and in designing assessments that align with these standards. States must also periodically update test elements to keep the system in line with industry developments. Although this process can be expensive, the literature provides relatively little guidance on the actual cost of developing statewide assessments, in part because system development often takes place over many years, and in part because not all costs (e.g., task force members' time) are accurately quantified.

Alabama administrators should also be aware that preliminary efforts are already underway to develop foundation level assessments associated with broad career cluster areas. While it is unlikely that these tests will be available in the near term, it is neither cost effective nor advisable for states to undertake their own test development efforts. According to Kim Green, Executive Director, National Association of State Directors of Career Technical Education Consortium, states might be better served waiting until a single set of cluster standards and assessments are developed for a cluster area. States could then choose to adopt or adapt identified standards and test items from these assessments to reflect own needs. This would have the benefit of lowering development costs and increasing assessment comparability across states.

¹ Detailed information on North Carolina's VoCATS system can be viewed at: <http://www.dpi.state.nc.us/cte/vocats/briefing/index.html>. Utah's testing program is profiled at: <http://www.schools.utah.gov/ate/Skills/skills.htm>. Details of Kentucky's testing system is available at: <http://www.kde.state.ky.us/KDE/Instructional+Resources/Career+and+Technical+Education/Skill+Standards+and+Assessments/>

² It is beyond the scope of this paper to document the process used to develop statewide exams. The interested reader is directed to Richard Erickson, *Key Questions in Developing Large-Scale, Standards-based Assessment Systems*; Ron McCage, *A Plan to Provide Technical Assistance to the Arizona Standards and Assessment System*; and Ron McCage, *Providing Industry-Validated Competencies, Standards, Item Banks, Assessments, and Scenarios Across State Lines*.

Technical Skill Assessments: Silver Standard Approaches

OVAE has identified state approved, locally developed assessments as satisfying the *Silver Standard* for test development. These include end-of-course or end-of-program exams that are created by secondary teachers or postsecondary faculty to address statewide content standards or locally identified, industry recognized skills.

Silver Standard 1: State Approved, Locally Developed Technical Skill Assessments

States unwilling to invest in third party assessments or to design their own statewide testing systems could recognize locally developed assessments as a measure of technical skill attainment. To ensure these assessments are valid and reliable, states would need to establish a formal process to judge locally developed assessments for their technical rigor, as well as their alignment to state or locally identified content standards.

Implementing this process would likely require that states establish a committee to develop test submission guidelines, along with procedures for reviewing proposed assessments and test administration strategies. Where statewide standards do not exist, the committee would also be tasked with reviewing locally identified standards for their relationship to marketplace needs, a process that could include consulting with state or national employers and industry associations to provide expert guidance, or requiring that local agencies submit evidence that their industry advisory board has approved their proposed program standards and assessments.

It is beyond the scope of this technical assistance project to identify all of the steps that Alabama would follow to create a state approval process for locally generated assessments. However, the state would likely need to address the following issues:

1. *Assessment committee membership*—How many individuals should be on the committee and from which sectors should membership draw (i.e., employers, unions, secondary and postsecondary CTE educators, state administrators)? Also, what type and level of expertise should members hold? Other issues include when and how the group will meet, and how viewpoints from multiple fields will be solicited.
2. *Identification of CTE content standards*—Do statewide content standards exist and, if not, to what level of skill specificity should learners be held at the secondary and postsecondary levels? How should national standards be integrated into local program design? How will local agencies justify their adoption of program standards and what criteria will be used to judge proposed standards? Is there a role for industry experts or consultants in the standards review process?
3. *Assessment types*—What forms of local assessments are acceptable? For example, should proposed assessments include a performance component or are paper-and-pencil exams sufficient? If written exams are administered, what types of questions are acceptable (i.e., multiple choice versus open response)? How will the validity and reliability of testing instruments be documented?

4. *Alignment of standards and assessments*—What procedures should local agencies follow to demonstrate that their assessments align with state or locally identified standards? Will agencies be required to submit an example of each assessment, or complete forms and assurances that their assessments meet state-established criteria?
5. *Assessment administration and scoring*—What are acceptable approaches for administering exams? How is test security ensured? Are students given a time limit for tests or project-oriented work? Who will score assessments and what criteria and passing thresholds will be used to rate project work?

Establishing a standardized, auditable assessment review process can help ensure that local agencies are employing consistent testing methodologies that comply with federal intent, while maintaining local control over curriculum and assessment. Creation of an oversight committee that develops and polices assessment guidelines and establishes testing and scoring controls would also assure that all students are held to industry recognized standards. This would presumably present less of an issue at the postsecondary level, where programs are subject to accreditation reviews to assess curricular relevance and delivery.

Establishing a state committee could also help institutionalize the creation of technical skill assessments, potentially helping to ease state adoption or adaptation of secondary foundation level cluster assessments currently in development by test developers.

Although subjecting local programs to an approval process would help establish statewide controls, it is likely that local exams would still lack some level of uniformity. Documenting local assessment practices would also impose an additional cost and reporting burden at the state and institutional levels, although much of this expense would be frontloaded during system development. Even so, it is likely that these costs would be a fraction of those associated with assessment design and test administration, were an agency to create its own, or subcontract for, a statewide assessment system.

Silver Standard 2: Alignment of Secondary Assessments with Postsecondary Content Standards

State representatives attending the Data Quality Initiative Institute in Savannah suggested the possibility of using postsecondary standards as a basis for developing secondary technical assessments. Although OVAE did not provide guidance on this issue, this approach is profiled because it could potentially promote articulation between secondary and postsecondary programs of study, as called for in the States' Career Clusters Initiative.

With this approach, secondary educators would collaborate with postsecondary institutions, either statewide or locally, to align secondary program standards and assessments with those used in associated postsecondary programs. Ideally, secondary technical exams would assess student attainment of technical and academic skills that entering postsecondary students would be expected to have mastered.

This approach would also require that states develop a process for approving locally generated standards and assessments, or guidelines and criteria that teams of secondary and postsecondary educators would follow when proposing technical skill assessments.

IMPROVING THE COLLECTION OF SOCIAL SECURITY NUMBERS

On January 30, 2003, the U.S. Department of Education updated its guidance on the interaction between the Family Educational Rights and Privacy Act (FERPA) and accountability requirements contained in the Carl D. Perkins Vocational and Technical Education Act of 1998. Specifically, the 2003 guidance clarified the manner in which state or local education authorities may disclose protected information contained within a student's educational record without prior written consent.³

In its 2003 guidance, the Department advised state education agencies that personally identifiable information within a student's secondary or postsecondary educational record must be protected from outside review. Under limited circumstances, for example in connection with an audit or evaluation of a federally-supported education program, protected student information, such as a student's Social Security Number (SSN), may be disclosed without the prior written consent of the student or his or her parent. To ensure student privacy, protected information must, however, remain under the direct control of an authorized representative of the state agency during the audit or evaluation process.

In practice, this means that a state education agency (or postsecondary institution) must delegate an employee or contractor to oversee the transfer and use of data in students' files. For example, should Alabama seek to track student placement into employment using students' SSNs to match against state Unemployment Insurance (UI) wage record data, an authorized state representative must either conduct the computer match at the state education agency or travel with the files to another facility to conduct or supervise the computer matching process.

Educational agencies and postsecondary institutions have greater flexibility in disclosing protected information contained within an eligible student's educational record if the student, or his or her parent, has provided prior written consent for the disclosure of information.⁴ In this case, a state education agency or postsecondary institution may simply transfer a student's SSN to a state UI agency (or another designee) to determine the employment status or degree attainment of eligible students without the need for direct oversight by an authorized state representative.

Prior consent is established when an eligible student or parent signs and dates a statement that:

- Specifies the records that may be disclosed;
- States the purpose of the disclosure; and
- Identifies the party or class of parties to whom disclosure may be made.

State agencies may request student consent for disclosure, for example by asking students to indicate their privacy preference as part of the institutional intake or admission process for CTE

³ To date, the Department has not issued new guidance to cover the Perkins 2006 reauthorization, suggesting that the existing 2003 guidance continues to apply to the new legislation.

⁴ An 'eligible student' is one who is either 18 years of age or older or who is attending a postsecondary institution at any age. For minors, consent must be obtained from a parent to disclose information.

programs.⁵ And although FERPA protects individuals from unauthorized disclosure or misuse of their SSN, it does not dictate the types of information education agencies or institutions may collect from students or their parents. In particular, FERPA does not prevent a college or university from requiring students to provide their SSN as a condition of enrollment.⁶

Indeed, many school districts and postsecondary institutions routinely ask parents or entering students to provide their SSN during the enrollment registration process. To accommodate those who choose not to disclose this information, education agencies must offer individuals an opportunity to opt-out from information release.⁷ This usually entails having individuals complete an “Objection to Use” or “Refusal to Disclose” form.

Care should be taken to differentiate protected information, such as a SSN, from that designated as “directory information” by an educational agency or institution. This is because education agencies may disclose “directory information” without prior written consent from an eligible student if the specified information is not considered harmful or an invasion of privacy if released. The elements of directory information are designated by a school district or institution, and may include, but are not limited to a student’s:

- Name;
- Address;
- Dates of attendance;
- Degree obtained;
- Grade level;
- Photograph;
- Student status (full-time, part-time, undergraduate, graduate);
- Telephone number;
- Date and place of birth; and
- Participation in officially recognized sports and activities.

As with protected information, an eligible student or his or her parent may choose to opt-out of disclosing directory information, meaning that this information may not be released for any purpose without prior written student consent. The Department has provided states with guidance on allowing students to opt-out of releasing their directory information, and a copy of the memo is included in Appendix A of this report.

⁵ See *Code of Federal Regulations* (34 CFR § 99.30(b)).

⁶ In a letter dated July 1, 2004, LeRoy S. Rooker, Director of the Family Policy Compliance Office, U.S. Department of Education, communicated that individuals may not use FERPA as grounds for filing a complaint if a university refused to enroll them because they did not disclose a SSN. The Director noted that other federal laws compel the disclosure of a SSN, but noted that some states have enacted laws to restrict the use of SSNs. A copy of this letter is included in Appendix B.

⁷ In particular, Section 7 of the Privacy Act (5 U.S.C. § 522a) stipulates that no person can be denied a right, benefit, or privilege provided by law because of the refusal to disclose a social security number. Federal law also requires that agencies requesting Social Security Numbers inform the individual whether disclosure is mandatory or voluntary, by what statutory authority the number is requested, and what uses will be made of the number.

State SSN Collection Practices

A recent national survey of state K–12 data collection practices, conducted by the National Center for Educational Accountability, indicates that students’ SSNs are not routinely collected for education purposes. According to the August 2006 survey, only 20 states collect and store SSNs as an element in students’ educational records, and just seven states—Alabama, Florida, Georgia, Louisiana, North Carolina, Texas, and Tennessee—use a SSN as the primary student identifier for enrollment purposes.⁸

For example, in Tennessee, all students enrolling in public school must supply a SSN upon registration, which is used to track their transitions among schools and school districts, and to produce information in response to statistical reports or surveys.⁹ Students refusing to provide a SSN are assigned a permanent personal identifier to take its place. However, if recently proposed legislation passes, the state will be required to drop the use of SSNs and substitute a personal identification number to serve as a unique student identifier for all students.

Similarly, in Florida, all public school districts request students to disclose their SSN when registering for school. The state also generates a unique student identifier that initially is matched to this number. For security purposes, the file that links the SSN to the unique student ID is stored centrally at the Florida Department of Education, separate from the rest of the student’s school records. This allows state Department of Education employees to match students’ records to SSNs for accountability purposes, while protecting student privacy.

Although students are asked to disclose a SSN upon registration, they or their parents may refuse to disclose this information. In some states, such as Georgia, this is accomplished by having parents complete an “Objection to Use” form, or in the case of Virginia, by simply declining to report the requested data. While there are some circumstances that compel the disclosure of a SSN at the postsecondary level, for example when a student applies for financial aid, higher education institutions usually provide information to students about the use of SSNs for research and analysis purposes under “Student Right to Know” policies. Examples of secondary “Objection to Use” and postsecondary “Right to Know” policies are provided in Appendix B.

Recommendations to Improve SSN Collection

Improving the collection of SSNs for secondary and postsecondary CTE concentrators in Alabama hinges on having students or their parents voluntarily disclose the number to school or institution officials. Perhaps the most efficient approach would be to collect SSNs upon initial student enrollment in school or college. Given that there are no FERPA provisions that prevent asking individuals to disclose their SSN, state administrators may consider issuing guidance to school district and postsecondary administrators clarifying state collection procedures.

As an example of the type of guidance that may be provided, Appendix C includes a copy of an informational memo originally sent to Virginia school districts in 1988, and subsequently updated

⁸ Link to http://www.dataqualitycampaign.org/survey_results/elements.cfm#element1 to see a copy of state survey responses.

⁹ From Tennessee state statutes: 49-6-5101. Assignment of personal identification numbers.

in 2003 to account for changes in state law. Clarifying federal law and acceptable approaches for collecting SSNs, as done in Virginia, can help remove any confusion at the local level as to what is, and is not permitted, when collecting protected student information.

If Perkins reporting does not provide sufficient justification for changing state policy on SSN collection, Alabama administrators might consider working with secondary and postsecondary CTE staff and faculty to improve SSN collection for CTE concentrators. This could be accomplished by providing information at statewide technical assistance workshops, providing models for SSN disclosure forms, or by developing an informational booklet that can be distributed to educators and parents, summarizing the reasons for collecting a SSN and rules governing its use. If desired, the state could also develop a form that eligible students or their parents could sign to authorize prior written consent for the release of their SSN; however, since education agencies or institutions can disclose SSNs for Perkins reporting purposes without prior consent, this additional step may be unwarranted.

TRACKING STUDENTS USING ADMINISTRATIVE RECORD MATCHING

Alabama currently relies on secondary and postsecondary agencies to report on placement outcomes for CTE completers using locally administered survey procedures. This approach undercuts data validity and reliability, since collection approaches differ across agencies. For example, one school district or college may follow-up on individual students using a telephone or paper survey, while another may base reporting on anecdotal information or teacher reports of student intent while enrolled. Basing reporting on locally generated data also burdens local administrators and staff, who must collect and enter information into state follow-up forms.

Data on the Office of Vocational and Adult Education’s (OVAE’s) Peer Collaborative Resource Network website indicate that Alabama administrators may have some difficulty tracking secondary CTE concentrators who complete their education and go on to some form of postsecondary experience.¹⁰ Of the 17,784 secondary CTE concentrators graduating in the 2002–03 academic year (i.e., the numerator of measure 2S1), 8,327 were identified for follow-up in 2003–04 (i.e., the denominator of measure 3S1)¹¹ [Table 1]. And of the number identified for follow-up, 7,850 unduplicated individuals were identified as placed in employment, advanced education, or the military (i.e., the numerator of measure 3S1). Consequently, the state was able to report a positive placement for 44 percent of individuals identified for follow-up in the year following their high school completion.

Table 1: Secondary and Postsecondary Perkins Placement Survey Response Rates: 2003-04

	Number Completers 2002-03	Number Completers Followed-up in 2003 -04	Number Completers Positively Placed in 2003-04	Number Completers in 2002-03 Missing (added) in 2003-04 Follow-up	Number Completers Not Positively Placed at Follow-up in 2003-04
Secondary	17,784	8,327	7,850	9,457	477
Postsecondary	1,556	7,495	5,840	(5,939)	1,655

Source: Consolidated Annual Report 2002-03 and OVAE Peer Collaborative Resource Network, www.edcountability.net. Accessed 5/31/07.

¹⁰ State data can be accessed at www.edcountability.net. Access to state data is password protected, with each state director given a user name and password. Contact Sarah Ray at (334) 242-9107 for information on accessing state-level data.

¹¹ Although states are now in the 2006–07 program year, data for the 2004–05 year had not yet been released at the time of this memo. The state defines its placement measure as the “Number of grade 12 completers surveyed who graduate and are placed in postsecondary/advanced training, employment, and/or the military within 12 months of exiting program.”

These statistics do not explain what became of the 9,457 CTE concentrators who completed high school in the 2002–03 academic year, but who were not identified for follow-up in the next year. Also unknown is the status of the 477 individuals in 2003–04 who were not found employed, enrolled in postsecondary education, or in the military. If a large number of these students were successfully tracked and simply not placed, then the state may have relatively little to gain in expanding its statewide reporting to include out-of-state completers for this group.

A review of postsecondary follow-up data paints a contrasting picture. According to website results, 1,556 CTE concentrators completed a postsecondary degree, certificate, or credential in the 2002–03 academic year.¹² However, postsecondary placement data for 2003–04 indicate that the state conducted follow-up of 7,495 individuals, 5,939 more than graduated the preceding year. To clarify the population that should be included in the measure under Perkins IV, state administrators may wish to review their reporting methodology with their OVAE Regional Accountability Specialist prior to finalizing their new measures.

For a modest cost, Alabama administrators could assess CTE concentrator enrollment in postsecondary education or advanced training by accessing centralized databases maintained by the Clearinghouse. State administrators can also obtain data at no cost on state employment placement by accessing Unemployment Insurance (UI) wage record data maintained by the Alabama Department of Industrial Relations, and for federal employment using the Federal Employment Data Exchange System (FEDES). The state should also consider working with the U.S. Department of Labor to access Wage Record Interchange System (WRIS) data, should the opportunity present itself in the coming months.

National Student Clearinghouse

The Clearinghouse maintains student enrollment and degree attainment data for 2,900 higher education institutions that account for over 91 percent of college students in the U.S. Data exist for public and private 2-year and four-year colleges and universities, and most large trade, vocational, and proprietary schools.

In exchange for voluntarily submitting data on enrollment and degree completion, the Clearinghouse offers postsecondary agencies free access to a variety of services. For example, to free staff from responding to information requests, higher education institutions may refer enrollment and degree verification requests from employers, credit grantors, and other commercial vendors to the Clearinghouse for fee-based processing. Students and alumni may also be referred for transcript copies, as may banks and other agencies seeking to assess the enrollment status of financial aid students.

The Clearinghouse also offers StudentTracker, a fee-based service that provides up-to-date information on students' enrollment status and degree attainment in any institution included in its database. StudentTracker data can be used to address Perkins core indicators for secondary placement and postsecondary student completion, along with placement and retention in higher education or advanced training. And because longitudinal data exist for most institutions, state

¹² The state definition for postsecondary placement in 2003–04 was reported as the “Number employed full completers summer 2001–02 through spring 2002–03.”

and institutional administrators can track students who enroll anywhere in the country or who transfer among institutions, including those who make lateral transitions that might otherwise be classified as stopouts. A more detailed description of these services can be found on the Clearinghouse website at: <http://www.studentclearinghouse.org>

Although Clearinghouse data can play an important role in responding to Perkins accountability measures, longitudinal information contained within the repository can also provide useful information that extends beyond Perkins. For example, in addition to tracking CTE concentrators' college placement two quarters following high school graduation, Clearinghouse data can also be used to assess all students' postsecondary persistence and time to graduation. This can help secondary educators gauge whether students who succeed in entering college have the skills needed to persist and complete their studies.

Accessing Clearinghouse Records

Clearinghouse matches are performed using directory information, such as a student's name, high school, birth date, and/or graduation date, to generate a probabilistic match with Clearinghouse records. According to Clearinghouse staff, probabilistic matching usually returns a hit rate of between 60 and 70 percent. The Clearinghouse also complies with FERPA regulations to ensure that student rights governing education records are protected, and as such, the agency provides only for the release of unblocked directory information unless FERPA authorizes release without consent.

Clearinghouse queries are initiated either through batch file exchange, in which agencies submit an electronic file containing information on multiple students, or via a secure password protected Web site for individual student queries. To initiate batch file exchange, the Alabama Department of Education would exchange files with the Clearinghouse via a secure file transfer protocol site, encoding data in either an Excel or flat file format.

Once the matching process is completed, the Clearinghouse sends a report that contains an overview of match results and a detailed report containing individual student data. This batch file—returned in a comma-delineated file (.CSV format)—contains the following types of data:

- Institution name
- Institution location by state
- Institution type (i.e., less than 2-year, 2-year, or 4-year or higher institution)
- Institution affiliation (i.e., public or private)
- Attendance dates
- Attendance sequence (if multiple colleges attended, order in which attended)
- Enrollment status (i.e., full-time, half-time, less than half-time, leave of absence withdrawn, deceased)

Institutions participating in the Clearinghouse's free online DegreeVerify program, which allows employers and others requesting degree verification to access Clearinghouse records, also receive data on concentrators':

- Graduation status
- Graduation date
- Degree title
- Degree major

To access CTE concentrator enrollment and completion data, state agencies or postsecondary institutions must subscribe to the StudentTracker service. Generally, costs for state-level membership are higher than those for service providers, who are eligible for a price reduction if submitting data to the Clearinghouse repository. Although high schools may also subscribe to StudentTracker services, relatively few districts currently participate.

Under the Clearinghouse pricing structure, fees for individual high schools run \$425 per school, irrespective of the number of students enrolled. Postsecondary institutions pay a fee based on the number of students they report as enrolled (i.e., fall headcount) for IPEDS reporting purposes. This fee allows subscribers to make an unlimited number of record inquiries during a 12-month period. Pricing levels fall into three categories, with institutions:

1. Paying an annual fee equal to the college's enrollment times 10¢, with a minimum annual fee of \$300.
2. Paying half the annual fee (5¢ times enrollment or \$150 minimum) by participating in the free DegreeVerify and EnrollmentVerify services OR reporting additional data elements specified by the Clearinghouse.
3. Obtaining free access by participating in the free DegreeVerify and EnrollmentVerify services AND reporting additional data elements specified by the Clearinghouse.

Matching Strategies

Participation in the Clearinghouse is voluntary, meaning that not all colleges or universities currently submit student enrollment or graduation data. As shown in Table 2, not all Alabama postsecondary institutions contribute core data to the Clearinghouse or subscribe to the EnrollmentVerify or DegreeVerify services. In particular, Jefferson State Community College, Selma Community College, Shelton State Community College, Snead State Community College, Stillman College, Virginia College, and Wallace State, have to date opted out of Clearinghouse participation.

Colleges that opt not to participate for cost or other reasons negatively affect state capacity to track students. This is because students who enroll in a non-contributing institution cannot be identified. Based on fall 2006 data, it would appear that 78 percent of Alabama postsecondary students attend an institution contributing data to the Clearinghouse. According to Jerry Smith, the regional director for the Clearinghouse, both Shelton State and Jefferson State have indicated their plan to submit data, although to date neither school has initiated data submission steps.

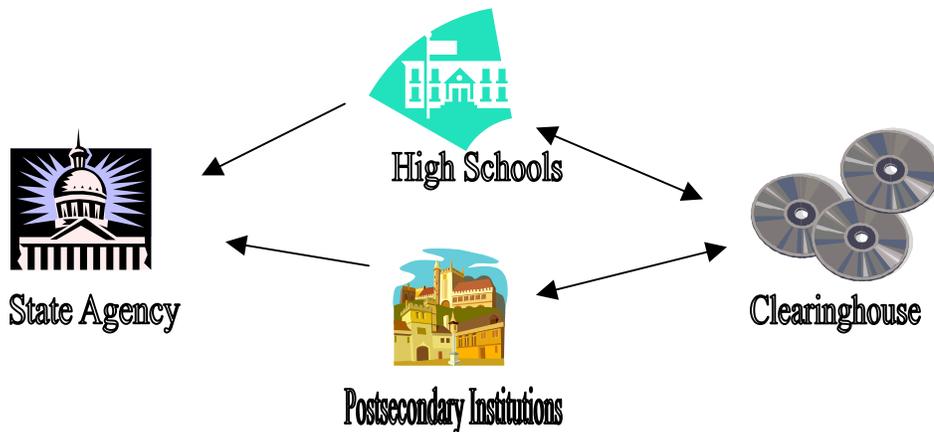
To make Clearinghouse participation feasible, state administrators may wish to consult with postsecondary administrators throughout the state to determine why institutions are not contributing data to the Clearinghouse. State administrators may also wish to consult with

Clearinghouse representatives to determine whether it would be possible to offer some financial or other incentive to increase institutional participation, since it is also in the Clearinghouse’s interest to obtain data on Alabama students.

Should the state choose to pursue administrative record matching with the Clearinghouse, state administrators have a number of options for structuring their relationship. These include:

Option 1: Direct Institutional Contract with the Clearinghouse

Alabama could choose to have each secondary and postsecondary institution individually contract for StudentTracker services directly with the Clearinghouse. Given the service cost of \$425 per high school, the statewide cost of having all 278 high schools contract for services would approach \$118,150 if each local high school were to individually contract for services. Given that only nine Alabama high schools currently contract with the Clearinghouse, it may not be cost effective for most secondary schools to contract for individual services unless the state had additional reasons, beyond Perkins, for asking high schools to track student placements.¹³



¹³ These high schools include Auburn City, Bayside Academy, Hoover City, Jacksonville City, Madison City, Madison County, Shelby County, Spain Park, and Troy City.

Table 2: Alabama Colleges Participating in the National Student Clearinghouse, by Service Type: 2007

College or University*	Enrollment ¹	NSC Participation Level			Student Tracker	Approximate Fee
		Core Service ²	Enrollment Verify	Degree Verify		
Alabama A&M University - Normal	1,137	✓		✓	✓	\$ 300.00
Alabama Southern Community College - Monroeville	2,548	✓		✓	✓	\$ 300.00
Alabama State University - Montgomery	1,213	✓		✓	✓	\$ 300.00
Athens State University - Athens	2,777	✓	✓	✓		Free
Auburn University - Auburn	4,092	✓	✓	✓	✓	Free
Auburn University at Montgomery - Montgomery	653	✓		✓	✓	\$ 300.00
Bevill State Community College - Sumiton	6,513	✓			✓	\$ 651.30
Birmingham-Southern College - Birmingham	292	✓		✓	✓	\$ 300.00
Bishop State Community College - Mobile	4,074	✓	✓	✓		Free
Calhoun Community College - Decatur	9,609	✓		✓	✓	\$ 960.90
Central Alabama Community College - Alexander City	2,985	✓		✓	✓	\$ 300.00
Chattahoochee Valley Community College - Phenix City	2,049	✓	✓	✓		Free
Concordia College - Selma	902					\$ 300.00
Drake State Technical College - Huntsville	939					\$ 300.00
Enterprise-Ozark Community College - Enterprise	2,295	✓	✓	✓	✓	Free
Faulkner State Community College - Bay Minette	3,891	✓	✓	✓		Free
Faulkner University (Alabama Christian College) - Montgomery	291	✓		✓		\$ 300.00
Gadsden State Community College - Gadsden	6,232	✓		✓		\$ 623.20
Huntingdon College - Montgomery	213	✓		✓		\$ 300.00
Ingram State Technical College - Deatsville	1,187					\$ 300.00
Jacksonville State University - Jacksonville	1,144	✓		✓	✓	\$ 300.00
Jefferson Davis Community College - Brewton	1,173	✓		✓	✓	\$ 300.00
Jefferson State Community College - Birmingham	10,630					\$ 1,063.00
Judson College - Marion	69	✓		✓	✓	\$ 300.00
Lawson State Community College - Birmingham	5,595	✓		✓	✓	\$ 559.50
Lurleen B. Wallace Community College - Andalusia	1,812					\$ 300.00
Marion Military Institute - Marion	293					\$ 300.00
Miles College - Birmingham	1,738	✓		✓		\$ 300.00
Northeast Alabama Community College - Rainsville	2,789	✓		✓		\$ 300.00
Northwest-Shoals Community College - Muscle Shoals	4,567	✓			✓	\$ 456.70
Oakwood College - Huntsville	410	✓		✓		\$ 300.00
Regions University (Southern Christian) - Montgomery	366	✓		✓		\$ 300.00
Reid State Technical College - Evergreen	662					\$ 300.00
Samford University - Birmingham	702	✓	✓	✓	✓	Free
Selma University - Selma	287					\$ 300.00
Shelton State Community College - Tuscaloosa	8,415					\$ 841.50
Snead State Community College - Boaz	2,368					\$ 300.00
Southeastern Bible College - Birmingham	60					\$ 300.00
Southern Union State Community College - Wadley	4,731	✓				\$ 473.10
Spring Hill College - Mobile	350	✓		✓	✓	\$ 300.00
Stillman College - Tuscaloosa	289					\$ 300.00
Talladega College - Talladega	425	✓	✓	✓		Free

The University of Alabama - Tuscaloosa	4,378	✓			✓	\$ 437.80
Trenholm State Technical College - Montgomery	1,501					\$ 300.00
Troy University - Troy	21,850	✓		✓	✓	\$ 2,185.00
Tuskegee University - Tuskegee	737	✓				\$ 300.00
University of Alabama at Birmingham - Birmingham	1,531	✓	✓	✓	✓	Free
University of Alabama in Huntsville - Huntsville	838	✓		✓	✓	\$ 300.00
University of Mobile - Mobile	293	✓		✓	✓	\$ 300.00
University of Montevallo - Montevallo	479	✓	✓	✓	✓	Free
University of North Alabama - Florence	1,019	✓	✓	✓	✓	Free
University of South Alabama - Mobile	1,433	✓	✓	✓	✓	Free
University of West Alabama - Livingston	354	✓	✓	✓		Free
Wallace Community College (Selma) - Selma	1,709					\$ 300.00
Wallace State Community College (Dothan) - Dothan	3,971	✓	✓			\$ 397.10
Wallace State Community College (Hanceville) - Hanceville	6,132	✓	✓	✓		Free
Other Alabama Participating Institutions:						
ITT Technical Institute - Birmingham	228	✓			✓	\$ 300.00

Total Alabama Post-Secondary Enrollment	149,220
Total Number of current Alabama Student records available to Clearinghouse subscribers	115,904
Percent of current Alabama Student records available to Clearinghouse subscribers	78%
Cost of Institutional Contracting with Clearinghouse	\$ 18,249.10

*Source: Alabama Commission on Higher Education, <http://www.ache.state.al.us/Colleges&Universities/Directory.htm>

¹Total undergraduate enrollment as of Fall 2006, where available

²As of April 3, 2007; Core Participant data is available to StudentTracker users

Contracting for StudentTracker services is more feasible at the postsecondary level, in part because the Clearinghouse provides discounts for institutions contributing student data. Although collegiate institutions are charged based on the total number of students reported in IPEDS fall enrollment, costs fall if institutions participate in the DegreeVerify and EnrollmentVerify programs and/or collect additional data elements identified by the Clearinghouse. Postsecondary institutional researchers are also more likely than secondary administrators to understand how to use StudentTracker data for other, non-Perkins related purposes, which can extend the benefits of Clearinghouse participation.

Clearinghouse participation would add only modest costs to statewide postsecondary Perkins reporting. According to state data, 25 postsecondary institutions are currently subscribing to StudentTracker services, either because they obtain services for free by subscribing to DegreeVerify and EnrollmentVerify services, or because they are contracting with the Clearinghouse to obtain services.

Based on fall 2006 enrollment data, the approximate cost of adding the 32 postsecondary institutions not currently subscribing to StudentTracker would be \$9,400. This cost, which would be borne by institutions, is small because many smaller colleges have enrollments of less than

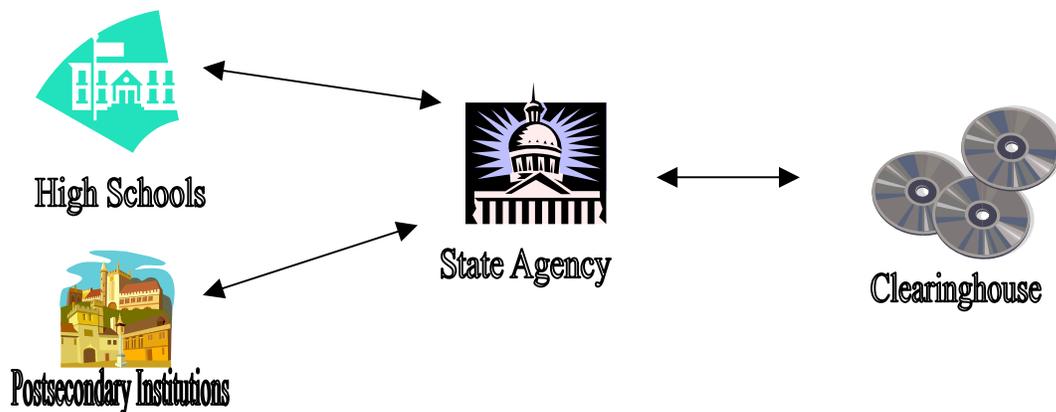
3,000 students, meaning that they would face the minimal Clearinghouse cost of \$300 to contract for StudentTracker services.

Reporting procedures would be relatively simple. Since record matching would occur at the institutional level, postsecondary institutional researchers at each institution would submit a batch file to the Clearinghouse containing unique identifiers for all CTE concentrators. Clearinghouse representatives would return a list of concentrators found in the national database, along with their enrollment and graduation status—only available for institutions participating in the DegreeVerify program—within a week of receiving the data request.

Institutional researchers would analyze Clearinghouse data and report to the state agency the number of CTE concentrators who were either retained in their original institution, found at another postsecondary institution, or reported as having completed their postsecondary education at their originating or another institution. State personnel would aggregate this data across institutions and enter these statistics in the federal Consolidated Annual Report used for Perkins reporting purposes.

Option 2: Statewide Contract with National Clearinghouse

A second option involves the Alabama Department of Education establish a direct relationship with the Clearinghouse to conduct Perkins administrative matches. To assess CTE concentrator outcomes, state administrators would compile information on CTE concentrators sent to them by either high school or college administrators. The state would then send a single batch file to the Clearinghouse, which would attempt to match listed students against its national database. A file containing positive matches would be returned to state administrators, who would report this information for Perkins accountability purposes.



This approach would be particularly efficient at the secondary level, since it would be more cost effective to have the state agency conduct administrative matches than to have each high school contract with the Clearinghouse at the \$425 per school rate. Assuming the Clearinghouse were to charge its posted rate of \$0.54 per match, in 2003-04 the state would have incurred a cost of just under \$4,500 to follow-up on the 8,327 secondary CTE concentrators identified in the

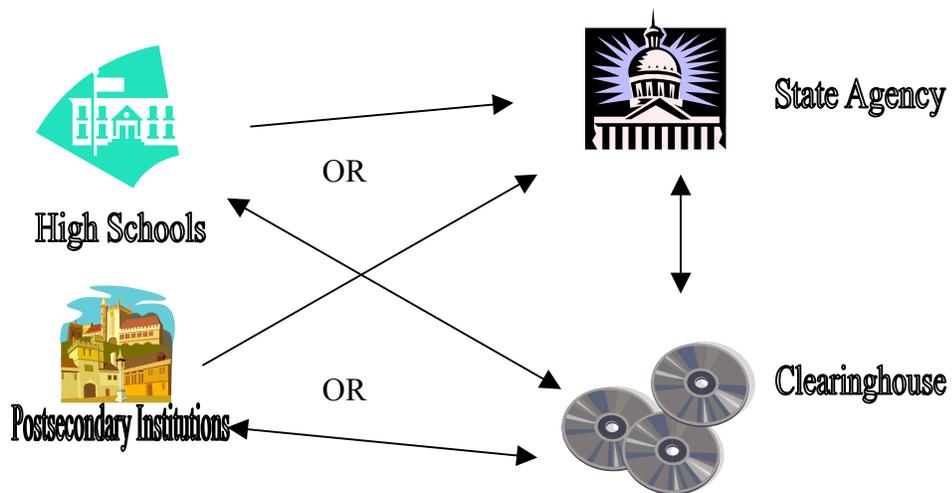
denominator of the placement measure in the 2003-04 program year.¹⁴ The state agency may also be able to negotiate a different fee structure with their Clearinghouse representative, depending upon the number of concentrator records to be submitted annually and the difficulty associated with generating student matches.

This approach could also prove cost effective at the postsecondary level, for though the state would not be eligible for the same fee discounts afforded to postsecondary institutions, the number of students that would be followed up would be substantially less than total statewide enrollment. Assuming that the Clearinghouse were to charge its posted rate of \$0.54 per match, in 2003–04 the state would have incurred a cost of approximately \$4,050 to follow-up on the 7,495 CTE concentrators identified in the denominator of its postsecondary placement measure.

There are a number of drawbacks to this approach. One drawback is that the conduct of administrative matching, with the state as an intermediary, would only provide one-time access to Clearinghouse data. State administered matching would also add another layer of bureaucracy to the reporting system, since postsecondary institutions would still be required to submit batch files containing CTE concentrators to the state using the file structure identified by the Clearinghouse. Postsecondary institutions not interested in obtaining StudentTracker services would, however, be spared the cost of contracting with the Clearinghouse, although it would be beneficial if they agreed to submit enrollment and degree data to the Clearinghouse.

Option 3: Statewide Contract—Direct Institutional Contact with National Clearinghouse

A third option entails the Alabama Department of Education contracting directly with the Clearinghouse on behalf of each secondary school and/or postsecondary institution in the state. With this approach, secondary schools and/or collegiate institutions would either conduct statewide matches directly with the Clearinghouse, or forward a batch file containing the names of CTE concentrators to the state, which would communicate directly with the Clearinghouse.



¹⁴ Note that this cost would climb to approximately \$9,600 if the state were to follow-up on the 17,784 CTE concentrators who completed high school in 2002–03, as reported by the state on the federal Consolidated Annual Report.

For example, the Wisconsin Technical College System pays a fee of \$0.12 for every student reported in IPEDS to the Clearinghouse on behalf of each college. The state and all of the 16 colleges in the state then have access to the Clearinghouse data for Perkins, as well as other educational reporting functions. Other states, such as California, have contracted with the Clearinghouse to provide all colleges with access to StudentTracker services. Volume discounts have reduced state costs, such that the state pays roughly half the quoted rate established by the Clearinghouse. In contrast, a third party organization in Maine has contracted with the Clearinghouse to provide all high schools in the state with free access to the StudentTracker system. However, to date, only 79 of 290 school administrative units have signed up for services.

Establishing a statewide contract with the Clearinghouse to collect secondary data would entail having the Alabama Department of Education agree to have each high school district in the state sign a contractual agreement to submit data to the Clearinghouse. The state department would be the central repository of these agreements until all high schools had submitted a signed agreement. The state would then submit the agreements to the Clearinghouse and work with high schools to report data using the proper data upload. Once signed agreements from each high school, along with a graduation file have been submitted, the Clearinghouse would give the state a substantial price break for system use.

According to the Alabama Clearinghouse representative, the cost of establishing a statewide contract would be \$0.75 per high school graduate. Assuming that the state had roughly 48,000 graduates, the state would face a fee of approximately \$36,000, versus the \$118,150 cost of having each high school contract individually. It is important to note, however, that this price would be available only if the state were able to guarantee the participation of all high schools in Alabama, and produced both a signed agreement and graduation data for all schools.¹⁵

Costs at the postsecondary level would vary depending upon state conditions. At the time this memo was produced, the Clearinghouse representative was unable to provide a price quote. Assuming that the Clearinghouse were to institute a cost of \$0.10 per record, the state would face a cost of approximately \$15,000 to provide all statewide colleges with Clearinghouse access. To obtain more concrete figures, state administrators should consult with Clearinghouse representative Jerry Smith, who is based in Cullman, Alabama. He can be reached via telephone at (256) 736-1888, or by e-mail at: smith@studentclearinghouse.org.

Federal Employment Data Exchange System

The Federal Employment Data Exchange System (FEDES) is a pilot initiative, funded through a grant to the state of Maryland by the U.S. Department of Labor, to assess the feasibility of conducting administrative record matches using state and federal data. The system is intended to assist states in identifying individuals employed by federal agencies so that they can respond to

¹⁵ According to Jerry Smith, the Clearinghouse has recently met with state education officials, including Deputy State Superintendent Ruth Ash, who have indicated that they are not currently interested in contracting with the Clearinghouse for statewide services.

performance-reporting requirements contained in federal programs. Since FEDES is funded using federal resources, there is no cost to states seeking to participate in the system.

The system functions as a secure information pass-through that allows states to access federal civilian and military employment records maintained by the Office of Personnel Management, the United States Postal Service, and the Department of Defense. Since records in these databases are not included in the nation's UI wage record system, states must either use FEDES or establish relationships with each federal agency to identify individuals in federal employment.

Agreements executed with the Office of Personnel Management and the United States Postal Service allow states to use returned data to respond to federal and state performance measurement, consumer reporting, and evaluation research activities required by federal law or regulation, state law or regulation, or the United States Office of Management and Budget. The agreement with the Department of Defense allows states to use military data to support only federal performance measurement, consumer reporting and evaluation research activities required by federal law or regulation, or the United States Office of Management and Budget.

Two agencies oversee the data exchange process. Administrative management is handled by Maryland's Department of Labor, Licensing and Regulation, which provides legal support to states seeking to join FEDES and serves as a liaison between state and federal agencies. The Jacob France Institute at the University of Baltimore handles technical operations associated with the data exchange process.

Accessing FEDES

To access FEDES, Alabama would need to establish a signed data sharing agreement with the Maryland Department of Labor Licensing and Regulation, which would conduct administrative matching on its behalf.¹⁶ Once an agreement has been executed, the state representative would be placed on the FEDES mailing list, so that he or she would receive information and notices relating to FEDES participation.

To conduct matches, Alabama would submit student records for administrative matching once per quarter following the FEDES data-exchange cycle. Data transmission would occur using secure file transfer protocol (SFTP), with data sent to a secure, password protected web portal so that no other state would have access to state files.¹⁷

Records are matched using individuals' SSNs as the unique identifier, meaning that Alabama would need to collect SSNs from each program participant to receive matched data. Each record also must include a state identifier and, if applicable, a discretionary program identifier, since a SSN may be identified within multiple states during a defined time period.

¹⁶ To obtain a copy of the data sharing agreement or to inquire further about FEDES, state administrators should contact Janet Staveley at (410) 837-6552 (jstaveley@ubalt.edu).

¹⁷ SFTP is similar to FTP, but it encrypts both commands and data, preventing passwords and sensitive information from being transmitted in the clear over the Internet. Alabama would be provided a copy of the SFTP software by the Institute, along with instructions and technical assistance in its use. Alternatively the state could save data onto a password-protected CD, which could be sent via FedEx to the Institute.

About a week following the file submission deadline, the Institute creates a combined state file for delivery to the federal Office of Personnel Management, the United States Postal Service, and the Department of Defense. Approximately two weeks later, these agencies return files containing matched records to the Institute. Institute staff creates a sub-file with each state's matched records, and announces a window of opportunity for states to perform a secure download.

This data transmission window opens about 1–2 weeks after the federal agencies provide matched records. Since the Institute is not a data warehouse, files are stored on the secure server only during the data-transfer window, after which they are destroyed. The total turnaround time from state submission of records to the return of matched records to each state is about one month. Matched data returned by federal agencies cover the eight most recent quarters, lagged three months.

Although states may submit a large number of CTE concentrator identifiers to the Institute, only data on matched records are returned. A great deal of detailed information is contained within matched records, with data elements varying among federal agencies. Appendix D lists the types of information provided for each record for which a match is generated.

WAGE RECORD INTERCHANGE SYSTEM

The Wage Record Interchange System (WRIS) was created by the federal government to assist states in responding to performance and reporting requirements contained in the Workforce Investment Act of 1998 (WIA) and programs authorized under the Wagner-Peyser Act. The WRIS serves as a clearinghouse for state Unemployment Insurance (UI) wage record data, which states may access to track the employment outcomes for individuals who participated in a state workforce investment program and subsequently left the state. States volunteering to join the WRIS agree to share UI wage record data with other states, and in return, may access wage record data from participating members.

Until the summer of 2006, the National Association of State Workforce Agencies administered the WRIS; however, in July 2006 the Employment and Training Administration (ETA) took over WRIS administration and governance. During the transition, eleven states withdrew from the WRIS over administrative concerns. Over time, six of these states have rejoined, and new states have signed on. As of April 2007, a total of 30 states and territories were participating.

These states and territories include:

Alaska	Maryland	Oklahoma
Arizona	Minnesota	Oregon
Arkansas	Mississippi	South Dakota
District of Columbia	Missouri	Texas
Florida	Montana	Utah
Idaho	Nebraska	Virginia
Illinois	Nevada	Washington
Indiana	North Carolina	West Virginia
Kansas	North Dakota	Wisconsin
Kentucky	Ohio	Wyoming

Since WRIS data are only available for states participating in the WRIS, individuals employed in states not referenced above would not be available for employment tracking purposes.

To participate in the WRIS, a state must sign a contract with the ETA that specifies the conditions and procedures governing data access. Under the agreement, states identify a State Unemployment Insurance Agency (SUIA) that holds wage data, irrespective of whether the agency also administers the state's UI program, and a Performance Accountability and Customer Information Agency (PACIA), or agencies, designated by the governor, with responsibility for coordinating performance assessment under WIA.

Assessing the WRIS Clearinghouse

The WRIS Clearinghouse operates as an intermediary among states. Each state SUIA submits data to the Clearinghouse for all individuals with employer-reported wages in a given time period. State data are entered into the Clearinghouse database, which maintains wage record data for up to eight quarters. This database contains only three information items: (1) an individual's

Social Security Number (SSN), (2) the quarter for which wages have been reported, and (3) the name of the state holding the detailed wage record information.

When wage record data are needed, for example to prepare for a federal accountability report, a state PACIA transmits a request file to the WRIS Clearinghouse that contains the SSNs of individuals for whom employment data are needed. Clearinghouse staff performs a record match against the centralized database to identify whether there are any wage data associated with the submitted SSNs, and matched records are noted. WRIS staff consolidates PACIA requests into state-level queries, which are then sent to each SUIA holding associated wage data. These queries, which consist of lists of SSNs, may include requests from different state PACIA for information held by a single SUIA.

Once a SUIA receives a query, it attempts to match the SSN in the file against information held in its own database. A response file, containing the requested wage record data for identified SSNs, is returned to the WRIS Clearinghouse, where staff extracts wage record data and converts it into aggregate statistical data. These data can be used by a PACIA to prepare performance and management reports for programs covered by the WRIS. Once a data request has been fulfilled, a state PACIA has 14 days to download the information; after this time, the WRIS Clearinghouse automatically purges the file from its server.

The WRIS Data Sharing Agreement advises that a PACIA may make requests for wage record data for the following purposes:

1. To obtain Wage Data for performance and reporting requirements for state and local programs within the jurisdiction of the Department of Labor, including those authorized under: (i) Title I of the Workforce Investment Act; (ii) Section 403(a)(5) of the Social Security Act (42 USC 603(a)(5)); (iii) Chapter 2 of Title II of the Trade Act of 1974 (19 USC 2271 et seq.); (iv) Wagner-Peyser Act programs, and (v) Chapter 41 of Title 38 of the United States Code;
2. To allow the PACIA or other state agency to assess the performance of individual training providers under the Workforce Investment Act;
3. To allow the PACIA to obtain Wage Data used to satisfy the performance and reporting requirements for the Job Corps Program, Senior Community Service Employment Program, Migrant and Seasonal Farm Worker Program, Native American Program, Veterans Workforce Investment Program, Youth Build Program, Registered Apprenticeship Program, Prisoner Reentry Initiative Grant Program, H-1B Technical Skills Training Grant Program, and the Community-Based and High-Growth Job Training Initiative Grant Program;
4. To allow the PACIA or other state agency to address performance and reporting requirements set forth in state statute for programs and activities identified in subparagraphs 1 through 3 of this paragraph C;
5. To obtain data for research and evaluation;

6. To allow the PACIAs to comply with requirements affecting expansion of the WRIS that is set forth in any of the following: (i) federal law; (ii) regulations promulgated by the Secretary of Labor; and, (iii) policy determinations issued by the Secretary of Labor;
7. As may be necessary to assist ETA with administering and managing the WRIS; and,
8. As may be necessary to assist the Operations Contractor with operating and troubleshooting the WRIS.¹⁸

Although the Data Sharing Agreement does not stipulate the use of WRIS data for Perkins purposes, in her Transmittal Letter of November 7, 2006, Emily DeRocco, Assistant Secretary for Employment and Training, U.S. Department of Labor, encouraged states to make use of the WRIS to help build an integrated workforce investment system. In particular, her transmittal letter noted:

“Educational agencies are a critical partner in this enterprise and require access to the same resources to report performance data as workforce agencies. I strongly urge you to consider designating your state agency as an additional PACIA covered by this data agreement.”¹⁹

The reference to educational agencies using the WRIS was added to the transmittal record in the hope that states would expand their use of WRIS data to more fully document the performance of their workforce investment system.

According to John R. Beverly, Administrator, Office of Performance and Accountability, U.S. Department of Labor, the question of whether states are authorized to access the WRIS to collect performance data identified in the Perkins Act is an unresolved issue. Since Perkins is not explicitly listed among programs identified in Section 3 of the Data Sharing Agreement (see above), ETA has not yet given formal permission for states to access the WRIS for Perkins reporting purposes. However, since no federal provision prohibits states from using WRIS data to assess Perkins or any other federal or state workforce program, so long as confidentiality provisions are maintained, the potential for states to use the WRIS for Perkins reporting still exists. According to Mr. Beverly, the U.S. Department of Labor is currently considering whether to open WRIS for Perkins reporting purposes, which will require proposing an amendment to the current data sharing agreement. Until formal approval is granted, he recommends that states not access the WRIS for Perkins accountability purposes.

It is worth underscoring that any state that belongs to the WRIS can propose an amendment to the Data Sharing Agreement for consideration by other states. As such, Alabama state administrators may wish to consider offering an amendment to the WRIS to allow PACIA to submit queries to

¹⁸ These criteria are drawn from the WRIS Data Sharing Agreement with March 2007 Proposed Amendments, posted on the U.S. Department of Labor website. This document was accessed on 4/27/07 at www.doleta.gov/Performance/WRIS%20Data%20sharing%20Agreement%20with%20March-07_Amendments.pdf

¹⁹ <http://www.doleta.gov/Performance/WRIS%20Transmittal%20letter%20FINAL%2011-07-06.pdf> accessed on 4/27/07.

the Clearinghouse for Perkins reporting requirements. This would likely require consultations with staff at the Alabama SUIA, as well as other state administrators.

APPENDIX A:
Opt-Out Form for Directory Information

FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA) MODEL NOTICE FOR DIRECTORY INFORMATION

The *Family Educational Rights and Privacy Act* (FERPA), a federal law, requires that [School District], with certain exceptions, obtain your written consent prior to the disclosure of personally identifiable information from your child's education records. However, [School District] may disclose appropriately designated "directory information" without written consent, unless you have advised the District to the contrary in accordance with District procedures. The primary purpose of directory information is to allow the [School District] to include this type of information from your child's education records in certain school publications. Examples include:

- A playbill, showing your student's role in a drama production;
- The annual yearbook;
- Honor roll or other recognition lists;
- Graduation programs; and
- Sports activity sheets, such as for wrestling, showing weight and height of team members.

Directory information, which is information that is generally not considered harmful or an invasion of privacy if released, can also be disclosed to outside organizations without a parent's prior written consent. Outside organizations include, but are not limited to, companies that manufacture class rings or publish yearbooks. In addition, two federal laws require local educational agencies (LEAs) receiving assistance under the *Elementary and Secondary Education Act of 1965* (ESEA) provide military recruiters, upon request, with three directory information categories—names, addresses, and telephone listings—unless parents have advised the LEA that they do not want their student's information disclosed without their prior written consent.²⁰

If you do not want the [School District] to disclose directory information from your child's education records without your prior written consent, you must notify the District in writing by [insert date]. The [School District] has designated the following information as directory information: [Note: an LEA may, but does not have to, include all the information listed below.]

- Student's name
- Participation in officially recognized activities and sports
- Address
- Telephone listing
- Weight and height of members of athletic teams
- Electronic mail address
- Photograph
- Degrees, honors, and awards received
- Date and place of birth
- Major field of study
- Dates of attendance
- Grade level
- The most recent educational agency or institution attended

²⁰ These laws are: Section 9528 of the ESEA (20 U.S.C. 7908), as amended by the *No Child Left Behind Act of 2001* (P.L. 107-110), the education bill, and 10 U.S.C. 503, as amended by section 544, the *National Defense Authorization Act for Fiscal Year 2002* (P.L. 107-107), the legislation that provides funding for the Nation's armed forces.

APPENDIX B:
Objection to Use Forms



**STATEMENT OF OBJECTION TO THE USE OF
SOCIAL SECURITY NUMBER
FOR**

STUDENT IDENTIFICATION

I do not wish to have the social security number of my child/children placed in the school records of the Cobb County School District.

The names of my children and the school they attend are as follows:

_____	_____
Name of first child	School
_____	_____
Name of second child, if appropriate	School
_____	_____
Name of third child, if appropriate	School
_____	_____
Name of fourth child, if appropriate	School
_____	_____
Name of fifth child, if appropriate	School

Signature of Parent/Guardian

Date

Sworn to and subscribed before me,

This _____ day of _____, 20_____.

Notary Public

Date of Expiration of Notary
Public Appointment

APPENDIX C:
Virginia Guidance Memos

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF EDUCATION
P.O. BOX 2120
RICHMOND, VIRGINIA 23218-2120

SUPTS. MEMO NO. 92
May 30, 2003

INFORMATIONAL

TO: Division Superintendents

FROM: Jo Lynne DeMary
Superintendent of Public Instruction

SUBJECT: Use of Social Security Numbers for School
Enrollment

The purpose of this memorandum is to notify school divisions of a change in the requirement that parents provide school divisions with a social security number for each student at the time of enrollment in school. During the 2003 General Assembly, House Bill 1716 was passed amending § 22.1-260 of the Code of Virginia. This section of the Code, as amended, continues to require each student to present a federal social security number within 90 days of his or her enrollment and to require the Board of Education to promulgate guidelines for determining which students are eligible to obtain social security numbers. The following change was made, however, regarding students whose parents are unable or unwilling to provide a social security number for them:

In any case in which a student is ineligible, pursuant to these guidelines, to obtain a social security number or the parent is unwilling to present such number, the superintendent or his designee may assign another identifying number to the student or waive this requirement.

The Board of Education provided school divisions with the *Guidelines for Administering the Requirement for Public School Students to Obtain a Social Security Number* on June 15, 1988, via Supts. Memo No. 125 INFORMATIONAL (attached). These guidelines permit a division superintendent to waive the social security number requirement and assign a student an alternative number for

identification under certain circumstances including the following:

- a student, along with his parents, by reason of bona fide religious training or belief, is conscientiously opposed to having a federal social security number;
- the student's application for a social security number would require disclosure of his illegal immigration status to a federal agency; and
- the student is a member of a non-immigrant family that is legally temporarily living in the United States, such as families whose members are employed in embassies or in other international organizations.

The 2003 amendment to § 22.1-260 of the Code now provides that the requirement may be waived or another identifying number be assigned in instances where the student is ineligible to receive a social security number or the parent is unwilling to present a social security number for the student.

There are additional requirements that govern the requests for social security numbers for students from parents. No child may be excluded from school for failure to provide a social security number. Section 7 of the Privacy Act (found at 5 U.S.C. § 522a note) requires that no person be denied a right, benefit or privilege provided by law because of his refusal to disclose his social security number. This law also requires agencies that request social security numbers to inform the individual whether disclosure is mandatory or voluntary, by what statutory authority the number is requested, and what uses will be made of the number. Finally, section 2.2-3808 of the Code of Virginia makes it unlawful for any agency to require an individual to disclose or furnish his or her social security number "not previously disclosed or furnished, for any purpose in connection with any activity, or to refuse any service privilege or right to an individual wholly or partly because the individual does not disclose or furnish such number, unless the disclosure or furnishing of such number is specifically required by state or federal law."

If you have questions, please contact Cynthia A. Cave, director of policy, at (804) 371-0558 or at ccave@pen.k12.va.us.

JLD/MJP/cb

Attachment

<http://www.pen.k12.va.us/VDOE/suptsmemos/2003/inf092a.pdf>

APPENDIX D:
Federal Employment Data Exchange System
Data Elements

Data Elements included in the FEDES Record Match

I. Office of Personnel Management

- Social Security Number
- Agency of employment
- Occupation code/name
- Pay plan
- Grade
- Adjusted basic pay
- Basic pay
- Total pay
- State of employment
- Work schedule code
- Begin date
- End date

II. United States Postal Service

- Social Security Number
- Location of Postal Employment (City, state, zip code, zip-4)
- Occupation title
- Pay grade
- Base rate of pay (annual salary, salary rate code)
- Date entered on duty

III. United States Department of Defense

- Social Security Number
- Flag identifying whether record is Active Duty or Civilian file or no match found

Active Duty:

- Last Name
- First Name
- Middle Name
- Suffix or Cadence
- Date of Birth
- Uniformed Service Pay Grade Code
- Taxable wages
- Primary DOD Occupation Code
- Primary Service Occupation Code
- Duty DOD Occupation Code
- Duty Service Occupation Code
- Secondary DOD Occupation Code
- Secondary Service Occupation Code
- Accession Training Service Code
- Service Branch Classification Code
- Duty Unit Location Country Code
- Duty Unit Location (State Code)
- Duty Unit Location (US ZIP Code)
- Active Federal Military Service Years
- Uniformed Service Initial Entry Date
- Enlisted Active Service Agreement
Begin Calendar Date
- Active Military Service Base Calendar Date
- Transaction Effective Calendar Date
- Enlisted Active Service Projected End
Calendar Date (ETS of Minimum Service)

Civilian:

- Service (Agency)
- Bureau
- Pay Plan
- Rank or GS rating
- Occupational Series
- Duty Location - Country
- Duty Location – State
- Separation Date