



Data Sharing Road Map: Improving Student Outcomes through Partnerships between Public Housing Agencies and School Districts

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Nearly four million children live in U.S. Department of Housing and Urban Development (HUD)–assisted housing. This “Data-Sharing Road Map” provides guidance on how Public Housing Agencies (PHAs) can collaborate with school districts and other partners to identify data-driven strategies for strengthening the educational outcomes of students living in public housing and Housing Choice Voucher (HCV) units. Based on the experience of PHAs that have successfully negotiated data-sharing partnerships, this Road Map provides practical guidance for establishing these partnerships and using the data effectively.

Data-sharing partnerships can generate actionable data that lead to improved school performance. For example:

- Based on data showing high rates of chronic absenteeism among students living in four public housing developments, a PHA implemented interventions to improve school attendance and was able to track measurable reductions in absenteeism over time.
- Based on data showing that elementary school students at a public housing development were struggling in math, a PHA implemented changes in after school programs to emphasize math proficiency.

Many PHAs are already working to improve educational outcomes for students residing in public housing or HCV units. By building partnerships with local school districts and other sources of school performance data, PHAs can gain access to valuable data that will help them tailor those efforts to maximize impacts on student achievement.

THE CASE FOR PARTNERSHIP

Forming a data-driven partnership with local school districts will help PHAs and education partners to provide stable and quality educational opportunities for children living in assisted housing administered by PHAs.¹ Sharing data helps partners to: (1) understand the current academic achievement of students in public housing; and (2) develop strategies and interventions aimed at improving educational outcomes. Data can be used to understand achievement gaps, target interventions, and gain a better understanding of success.

PHAs may find that it is easier to connect public housing residents than it is to connect HCV residents to some types of educational opportunities due to the fixed location of public housing. However, most data-sharing arrangements can allow PHAs to look at the education outcomes of public housing and HCV residents separately, and tailor solutions accordingly.

KEY HIGHLIGHTS

This Road Map covers best practices on how PHAs and school districts may collaborate to share data.² PHAs should consider the following key actions when negotiating a data-sharing agreement with school districts to assess and monitor educational outcomes for students living in assisted housing.

- Use data and talk to families about where their children attend school to determine which school district is the appropriate partner.

¹ Please note that throughout the remainder of this document, the term “assisted housing” refers to housing provided through the public housing and Housing Choice Voucher programs.

² The term “school district” as used in this document refers to any combination of schools or school districts.

- Begin by reaching out to school district staff with whom the PHA already has an existing relationship, if applicable.
- Conduct outreach to potential third-party partners, such as colleges, universities, research organizations, and education service providers. These partners can help the PHA think about the appropriate educational indicators and the types of analyses that will help the PHA and school district partner. Bring these third-party partners to the discussion early in the process. Their input will contribute to a successful partnership with your school district partner.
- Identify indicators that are specific to priorities and strategies of both the PHA and school district partner.
- During the first meeting with school district and third-party partners, address the benefits to all partners. If possible, provide partners with the percent of students enrolled in local schools who live in assisted housing. Highlight what is known about the educational achievement gaps of students from low-income communities, as well as ways in which the partnership might address these performance issues.

The following are additional actions PHAs should consider as they get closer to preparing the first draft of the data-sharing agreement with school districts. These actions can help PHAs avoid common pitfalls that cause data-sharing agreements to stall or fail to be executed.

- Because education records contain data that have privacy protections under Federal law, data sharing with school districts might seem to be more acceptable if agreements allow PHAs to release limited information about their residents to the school districts. However, PHAs are also subject to Federal, State, and local laws that may restrict data sharing.
- Determine the distribution of work across partners with particular focus on which partner will conduct the data linkage and which partner will conduct data analysis. If an agreed-upon third party will be involved in these processes, clearly outline the third party's role and how each partner will engage the third party.
- Draft a written agreement between two (or more) partners that clearly states the purpose, the individually identifiable information each party is agreeing to share, the types of analyses allowable with the shared individually identifiable data, the procedures each partner will take to limit disclosure of students' individually identifiable information, the persons within each partner's organization who will have access to the individually identifiable data, the procedures each partner will take to prevent unauthorized use of shared individually identifiable data, and the procedures for destroying the individually identifiable data following completion of the analyses.

While *aggregate* reports³ can be generated without sharing individually identifiable data, in some cases one partner will need to share individual-level *personal identifiers*⁴ in order to link the education and housing data.

³ Aggregate reports combine the results for individual students into summary statistics. These statistics may include the number or percentage of students overall or in each of the reporting subgroups for specific outcome measures (e.g., the percentage of students living in PHA residences who graduate from high school). These aggregations will provide data in large enough groupings (varies by agency) so as not to risk disclosure of residents' identities for uses they have not specifically granted.

⁴ Examples of personal identifiers needed to link data include, but are not limited to, first name, last name, and date of birth.

In all cases, the data sharing must comply with all applicable Federal and State confidentiality and privacy laws. The relevant Federal privacy laws, and data security best practices, are discussed in the *Formalizing the Partnership* section below; counsel should be consulted regarding applicable Federal and State laws.

PHAs with public housing may be able to create aggregate reports without sharing individually identifiable data. To accomplish this, PHAs can provide the local school district with the addresses of public housing buildings, and the local school district can use these to provide aggregate-level data on some of the key metrics discussed in this Road Map. Because the addresses of these buildings are publically available and the school district would be providing the data in aggregate form, there should not be privacy concerns.⁵ The PHA, working with the school district and other education partners as necessary, could use the data to assess how residents are performing as a whole and target outreach and interventions to residents accordingly. This can be a great first step towards using education data to better understand the outcomes and needs of public housing residents, especially for smaller PHAs concerned about their capacity to enter into a data-sharing partnership with local school districts. A similar method can work for Multifamily Owners that are interested in understanding the education performance of their residents in a single property.

⁵ These addresses may be found online at https://data.hud.gov/data_sets.html.

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EXAMPLES OF WHAT DATA MAY BE SHARED AND HOW IT IS USED

Key Education Indicators

Public Housing Agencies (PHAs) may have some information on school enrollment and performance for the children they serve, but in most communities, such information is self-reported by families and may be incomplete. Access to more comprehensive information will help partners develop better strategies and interventions aimed at improving academic achievement. Some examples of key education indicators include:

- *On-time enrollment*—The percentage of students who enroll prior to the first day of school.
- *Attendance*—The percentage of students who are chronically absent (absent 15 or more days a year),⁶ as well as metrics/trends on the number of excused and unexcused absences throughout the academic year.
- *School discipline*—The rate of student suspensions by the number of incidents, number of students, and number of days suspended.
- *Standardized test scores*—The percentage of students who are proficient in math, reading, science, writing, etc. Full data on student test scores, by test type, are helpful to measure change over time.
- *Academic progress*—Academic progress outcomes vary by school district and grade level. Metrics to consider include, but are not limited to, grade point average, passing of core courses, and credit accumulation (for high school students).
- *Graduation/dropout*—The percentage of students who graduate and the subset of those who graduate high school on time (in four years). Additionally, it is important to look at trends for students who drop out (e.g., timing).

School districts across the nation commonly track the indicators listed above. It is also important to determine if additional indicators are needed that are specific to priorities or strategies of potential partners and the community.

It may be helpful for the data to be disaggregated, in accordance with applicable privacy laws, to better inform the partnership's work. For example, the data can be broken down using demographic indicators (e.g., age, gender, race, ethnicity), school indicators (e.g., school location, grade), and the PHA location(s), consistent with Federal, State, and local privacy laws.

A Note on Using Individually Identifiable Data

Some data-sharing partnerships are structured to allow partner staff to access individually identifiable and linked data for research and evaluation purposes or to target services to the clients or students whom they serve. Access to individually identifiable records should be limited to cases where the staff member has a need to see those records for authorized program purposes. Such access is only authorized and legally permissible either through a signed, written consent from a parent or eligible student or pursuant to an exception to the consent provisions as set forth in applicable Federal and State privacy laws. Given the applicable legal

⁶ U.S. Department of Education, *Chronic Absenteeism in the Nation's Schools*, available at <https://www2.ed.gov/datastory/chronicabsenteeism.html>. Also note that different schools/school districts may have different definitions of "chronic" absenteeism.

requirements and the significant amount of information that can be learned at the aggregate level, most PHAs will focus on working with de-identified aggregate-level data.

Research-to-Practice Examples

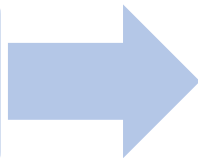
With linked data, descriptive statistics can be extremely informative to the partnership. Partners may seek to answer questions such as:

- (1) How many students within the school district are receiving housing services from the PHA?
- (2) Which schools are these students attending?
- (3) How do these students' educational outcomes compare with peers'?
- (4) Which sub-populations of students served by PHAs have the largest achievement gaps?
- (5) Which sub-populations of students served by PHAs have high academic achievement?

Analysis of linked data is helpful to understanding the current academic achievement of students in assisted housing, informing strategies and interventions aimed at improving educational and well-being outcomes, and evaluating the impact of those strategies and interventions. The solutions generated by data-sharing partnerships are derived from an iterative process that requires the engagement of key stakeholders and a focus on making data-driven decisions. Highlighted below are several research-to-practice examples.

Research Insight Example

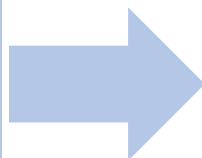
Analysis found **on-time enrollment** was significantly lower in three of the city's ten public housing buildings run by the PHA.



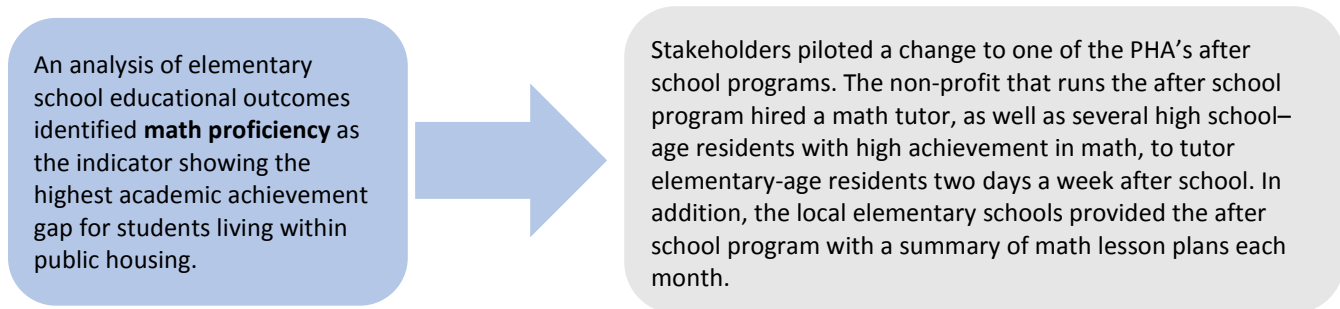
Resulting Strategy/Intervention Example

These three public housing buildings had transportation barriers impeding residents' access to local schools. Specifically, because there were no good public transportation routes to the schools, transportation was likely the barrier to parents enrolling students on time. Over the summer, staff from the PHA and school district planned two enrollment events on-site in each of the public housing buildings. Staff from both organizations attended and provided all of the necessary paperwork to support parents in enrolling their children. A local faith-based organization was also on-site to provide donated backpacks and school supplies.

An analysis in one city found that 53 percent of the students residing in four of the public housing buildings run by the PHA were **chronically absent**.



The PHA, the city, and a group of community stakeholders partnered to implement a set of comprehensive student and parent outreach strategies targeted at the four public housing buildings with the 53 percent chronic absenteeism rate. The partnership was able to track the absenteeism rate over time and show that within four years it had dropped 14 percentage points to 39 percent.



GETTING STARTED – FORMING A RELATIONSHIP WITH YOUR EDUCATION PARTNER

Identifying School Partners

A PHA that is interested in pursuing an education partnership should first determine which school district would be an appropriate partner. This decision primarily should be based on where students in its housing are most likely attending school. The PHA should look up public school catchment areas within its service area, as well as identify nearby private and charter schools. This may be an easier determination if the PHA's service area is within one city school district. The process may be harder for a PHA with many school districts within the area it serves. In these circumstances, it is important to look more specifically at the school catchment areas of each public housing building, as well as nearby private and charter schools. The resources for determining your school catchment areas will also vary by region, but can be found online or obtained from your local school district's board.

Making the First Contact

There is no single, best person or office in an education system to approach about a data-sharing partnership. The best contact will vary by school or district, and it may be a principal, the superintendent or another individual on the leadership team, a teacher or counselor, a student services employee, an information technology employee, or a research and evaluation staff member. It is always easiest to build from existing relationships, so if any staff member of the PHA already has a relationship with a school or district employee, then that is the best place to start. That person should know who within the school or district would be most interested in learning more about the opportunity and presenting it to the leadership. As discussed in the *Mechanics of the Partnership* section below, the partnership likely will ultimately need to be approved by the district's school board or superintendent—but it is usually best to start with district staff.

Engaging Other Local Partners

A successful PHA and education partnership will often engage additional resources within the community. Third parties such as local universities and think tanks are great resources to support the analytic work of the partnership. Local foundations may be interested in supporting the partnership financially. Local service providers (e.g., social service organizations, after school programs, mentorship programs) may be interested in collaborating to implement new, data-informed strategies and interventions. It is best to engage these partners at the beginning of the process to ensure the partnership develops in a way that fits within the existing culture and context of the community.

Preparing for the First Meeting

The initial meeting should highlight the case for partnership—what is the mutual issue, and how will each partner and those they serve benefit from the partnership?

One of the most compelling data points for a school district may be an estimate of how many students within its district reside in the PHA's housing. Sharing data indicating an overlap in children and families served will highlight the opportunity to collaborate. The PHA will likely not have an exact number until data are exchanged with the school district, but the PHA may be able to provide an estimate by simply using the number of school-age children and youth in its housing.

It is also important to talk about the likely achievement gap for local children in the PHA's housing, given national research on the academic achievement of low-income children.⁷ This will further the case for partnership and may lead into a discussion of shared goals. It is helpful to set aside time in the meeting for each partner to share its current goals and priorities to identify where they overlap.

The PHA should think through and list the potential benefits of the partnership in advance of the first meeting. These may be driven by what is currently happening in the community and school district to address local challenges. Understand the role of the school district staff with whom you are meeting and tailor your message to them. Listed below are several examples of potential benefits:

- *Improving educational outcomes*—If, for example, an estimated 40 percent of students attending a school district are low income, and national statistics show a significant achievement gap for this group, then there is an opportunity to work together to better serve this vulnerable population.
- *Access to resources*—If the PHA has engaged other local service providers, research entities, and/or funders, it should highlight this in the first meeting. Cross-agency partnerships often garner significant community support, as they show a commitment to work more efficiently and effectively to better serve a community. In times of limited resources, access to these additional supporters is very beneficial.
- *Relationship building*—If the current relationship between the PHA and school district is crisis driven, it is important to discuss how the agencies currently work together, and how that relationship may develop into a more proactive working relationship that is beneficial to children and families. For example, if a public housing building will be closing next year, how might the PHA work with the impacted school district and families to prepare for resident relocations and ensure school stability, or at a minimum, seamless transitions, if school changes are necessary.

The PHA should consider what laws it operates under that may restrict data sharing and should also anticipate the school district's concerns, such as, but not limited to, data privacy and confidentiality, and the resources that it will need to dedicate to the partnership. This Road Map addresses some of those concerns, but the PHA will also need to address them in the local context.

⁷ http://www.frbsf.org/community-development/files/CI_Summer2012_Reardon.pdf.

FORMALIZING THE PARTNERSHIP

Define the Shared Goals

It is critical that both the PHA and school district have a shared understanding of an agreement on the primary goals of the partnership, as well as the role that each partner will play to ensure the achievement of these shared goals. These conversations may include agency leadership, program staff, and information technology (IT) staff. Additionally, it may be beneficial to include community partners and potential funders in this early stage of developing the partnership.

The Mechanics of the Partnership

Linking student education and housing data may require at least one of the agencies to disclose personal identifiers (e.g., name, date of birth) in order to match individual-level records. Protecting privacy is a high priority for both the PHA and school district. The Family Educational Rights and Privacy Act (FERPA) protects education records, and personally identifiable information contained therein, that are maintained by schools and school districts that receive funds under programs administered by the U.S. Department of Education. Housing data shared by a PHA may be protected by Federal laws, as well as the State's privacy law, which may be more restrictive than Federal laws.

FERPA⁸ is a Federal law that protects the privacy of student education records and gives parents and eligible students certain rights with respect to such records,⁹ including, under certain circumstances, rights of inspection and review and, generally, the right to consent to the disclosure of these records.

Under FERPA, a parent or eligible student must provide a signed and dated written consent before an educational agency (such as a school district) or institution (such as a school) discloses personally identifiable information (PII) from a student's education records, unless the disclosure satisfies one of the exceptions to FERPA's written consent requirement.¹⁰ PII refers to information, such as a student's name or identification number, that can be used to distinguish or trace an individual's identity either directly or indirectly through linkages with other information.¹¹ FERPA applies directly to all educational agencies and institutions that receive funds under any program administered by the Department of Education.¹² Private schools at the elementary and secondary levels generally do not receive funds from the Department of Education and are, therefore, not subject to FERPA.

Additional information on FERPA and student privacy can be found on the Department of Education's Privacy Technical Assistance Center (PTAC) website at ptac.ed.gov.

Because education records can possess stronger privacy protections than PHA records, the most practicable method to share data will often be for the PHA to share personal identifiers, provided the personal identifiers are not protected by the State's privacy laws, and additional program participation data (as needed) for school-age clients it serves with the school district. The school district may then match housing data with education records to create a linked data set. The school district may analyze this linked data to answer key questions so

⁸ 20 U.S.C. § 1232g and 34 CFR Part 99.

⁹ Education records are, except as otherwise provided, those records that are directly related to a student and are maintained by an educational agency or institution or by a party acting for the agency or institution. 20 U.S.C. § 1232g(a)(4) and 34 CFR § 99.3.

¹⁰ See 20 U.S.C. §§ 1232g(b)(1) and 1232g(b)(2); 34 CFR §§ 99.30 and 99.31.

¹¹ See 34 CFR § 99.3.

¹² See 34 CFR § 99.1.

long as both partners approve of the school district performing the analysis and the results shared with the PHA are fully de-identified. (Please see the *De-Identifying Data* section below for additional details.)

In some cases, the school district will have the analytic capacity to fulfill all research and evaluation requests. If not, the PHA may have capacity, or the partners may work with a third-party local university or research agency to conduct analyses, particularly more sophisticated statistical analyses (e.g., predictive analytics, rigorous evaluations). The school district may share fully de-identified, individual-level data with the PHA or a third-party research entity to conduct the analysis because the disclosure of de-identified records or information is not a disclosure under FERPA.¹³ If a third-party research entity needs access to PII from education records to conduct the analysis, the disclosure to the third party only would be permissible under FERPA if the disclosure is made with prior written consent of the parents or eligible students or if the disclosure complies with one of FERPA's exceptions to the requirement of consent (e.g., audit or evaluation exception, studies exception). (For additional information on disclosing PII from education records under the two exceptions listed above, please see the Department of Education's resource *Guidance for Reasonable Methods and Written Agreements*.¹⁴)

Another method to link housing and education data is to have a third party link and analyze the data. One example of this structure is having a lead agency managing an integrated data system (IDS) that links administrative data from multiple government agencies.

De-Identifying Data

As used in FERPA, the term "personally identifiable information (PII)" refers to direct identifiers such as a student's name or address, and indirect identifiers such as a student's date of birth, and any information that is "linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty."¹⁵ Accordingly, there is no "disclosure" of PII under FERPA when education records are released after all direct and indirect identifiers, along with other PII, have been removed.¹⁶

The Department of Education encourages school districts to be aware of publicly available data on students, and of the cumulative effect of student data disclosures. The Department of Education recognizes that the risk of disclosing identity or individual attributes in statistical information cannot be completely eliminated, at least not without significantly affecting the usefulness of the information. It is critical to manage the risk in each request and release of information so that data are made available to inform policy and practice and the risk of disclosure remains very low.

Even if all direct and indirect identifiers have been removed, the remaining data may still allow re-identification of specific individuals. If that is the case, then the information is not considered properly de-identified. Application of additional disclosure avoidance techniques such as masking, blurring, or perturbation may be necessary.¹⁷

¹³ See 34 CFR 99.31(b)(1).

¹⁴ http://ptac.ed.gov/sites/default/files/Guidance_for_Reasonable_Methods%20final.pdf

¹⁵ See 34 CFR § 99.3.

¹⁶ See 34 CFR § 99.31(b)(1).

¹⁷ The Privacy Technical Assistance Center's resource *FAQs on Disclosure Avoidance*, available at http://ptac.ed.gov/sites/default/files/FAQs_disclosure_avoidance.pdf, may be helpful in this regard.

Written Agreements

Detailed information on written agreement requirements under FERPA's exceptions to consent can be found in the Department of Education's Privacy and Technical Assistance Center's resource *Guidance for Reasonable Methods and Written Agreements*.¹⁸

Before the school district may release PII from education records to anyone other than an employee, under the audit or evaluation exception or studies exception, FERPA requires a written agreement between the school district and the receiving party.¹⁹ (The most common form of this agreement is a Memorandum of Understanding, or MOU.) If the school district only releases de-identified data, FERPA does not require a written agreement, but a PHA and school district may still choose to develop one to ensure that the data are only used for the intended purposes and that the privacy of individual records is properly protected.

While the following list does not address the legal requirements that must be met for written agreements that are required under FERPA, and all applicable Federal and State confidentiality and privacy laws, a two-way written agreement should include, but is not limited to:

- specifying the personally identifiable data that the PHA will send to the local school district, how often, who can access them, and what analyses will be run;
- specifying that the personally identifiable data are only being shared for research and evaluation that both the PHA and school district have agreed to conduct;
- specifying that the school district destroy the incoming list of personally identifiable data when it is no longer needed for the purpose specified, and provides a time period for that destruction; and
- specifying policies to protect the personally identifiable data from further disclosure or unauthorized use, including specifying that the school district may not re-disclose the personally identifiable data.

Best Practices: Transparency

It is important to be transparent with stakeholders about what information is being shared, how it is being used, and how the data-sharing partnership is ultimately benefiting children and families. Communications may need to be multi-faceted to reach the various stakeholders—who include, but are not limited to, children and families and other local partners across the community.

Best Practices: Data Governance and Security

Strong data governance and data security policies and procedures are critical to cross-agency data-sharing partnerships. The following two resources may be helpful in establishing these policies and procedures.

- *Data Security Checklist* (December 2011, revised July 2015)
<http://ptac.ed.gov/sites/default/files/Data%20Security%20Checklist.pdf>
 This checklist will assist stakeholder organizations with developing and maintaining a successful data security program by listing essential components that should be considered when building such a

¹⁸ http://ptac.ed.gov/sites/default/files/Guidance_for_Reasonable_Methods%20final.pdf

¹⁹ See 34 CFR § 99.31(a)(6)(iii)(C) and 34 CFR § 99.35(a)(3).

program, with a focus on solutions and procedures relevant for supporting data security operations of educational agencies.

- *Data Governance Checklist* (December 2011, revised June 2015)

<http://ptac.ed.gov/sites/default/files/Data%20Governance%20Checklist%20%281%29.pdf>

This checklist will assist stakeholder organizations with establishing and maintaining a successful data governance program by summarizing the key data privacy and security components of such a program and listing specific best practices.

TRACKING AND MONITORING KEY PERFORMANCE INDICATORS

Understanding the baseline educational performance of children in assisted housing is crucial for developing targeted educational support programs.

Developing short-term and long-term outcome indicators with input from all partners at the onset of a program best facilitates the tracking of results. For example, a local organization may be interested in a partnership to increase grade-level reading by the end of the third grade, a known predictor of school success and high school graduation. Some short-term goals may include increasing “school preparedness” for first-time students, reducing chronic absenteeism, and increasing participation in summer learning opportunities to ensure children do not fall behind. Having outcome indicators that capture the achievement of these intermediate goals makes it possible to assess progress towards the ultimate goal of increasing grade-level reading.

Other times, targets may be externally determined. For example, a city may have a place-based scholarship program that offers free tuition at local colleges and universities. Here, the emphasis should be on the tracking of student metrics that align to the scholarship eligibility criteria. The partnership should identify how it will contribute to the improvement of these metrics.

Remember not to only focus on measuring achievement gaps. A lot can be learned from a better understanding of success.

CASE STUDY: A PARTNERSHIP BETWEEN A CITY PUBLIC HOUSING AGENCY AND A CITY PUBLIC SCHOOL DISTRICT

The Executive Director of a PHA has been working with her local education partners to better understand evidence-based practices within the field of education (K-12) that are associated with increased performance on key education metrics. When asked by her education partners for a profile of the students whom she houses, the Executive Director was only able to provide basic demographics extracted from her property portfolio management system. The education partners probed a bit more and inquired about the availability of the following educational achievement metrics for children housed, by PHA and perhaps by school and/or housing development:

- percent of children reading on grade level by third grade;
- percent of children proficient in reading by eighth grade;
- percent of children proficient in math by eighth grade;
- percent of children graduating high school and on-time graduation;
- percent of children starting school on time (between first and third day of school year);

- percent of children experiencing chronic absenteeism;
- percent of children suspended/expelled (elementary/middle/high school); and
- percent of children who drop out.

This case study will cover two options for the PHA to access the children’s education data. The first is to partner directly with a local school district, and the second is to partner with a local integrated data system (IDS).

Option 1: A Partnership Between a Public Housing Agency and a City Public School District

Forming a relationship with the school district

The PHA’s Executive Director approached the Superintendent of her local school district about the possibility of sharing data to support efforts to understand and improve the educational outcomes for children housed by the PHA in public housing. The Superintendent agreed to meet and invited the School Board’s Solicitor and the Director of Student Services to join the conversation. The Executive Director of the PHA invited one of her Public Housing Community Managers, the Director of its Family Support Services program, and a few of the PHA’s existing education partners.

They had a very successful first meeting. PHA leadership and their existing education partners prepared a short presentation in which they walked through the goals of the partnership, the specific data to be shared between the partners, how data would be used, and the anticipated benefits of this partnership to the school district and the PHA. The Superintendent was surprised to hear that an estimated 600 students in the district are currently living in public housing. PHA leadership explained that this large overlap in children served was a strong case for a partnership, especially given the national research showing the achievement gap for low-income students. PHA leadership also noted that sharing data would allow the school district to concretely answer questions about the current educational outcomes of children living in public housing and evaluate the effectiveness of the district’s strategies and interventions to improve those outcomes. Following the meeting, the school district agreed to partner with the PHA. With the school district onboard, the group started to design the data-sharing model.

Designing the data-sharing model

There were many factors that the group considered while designing the data-sharing model including, but not limited to:

- protecting the privacy of children’s data and complying with all applicable privacy laws;
- identifying where there is technical capacity to link data;
- identifying where there is capacity to analyze the data and potentially conduct research and evaluations; and
- finding ways to transmit data securely.

Since both the PHA and school district had technical capacity to link data, the decision of where to link data came down to compliance with FERPA. The key information the PHA sought did not fit under FERPA’s audit or evaluation exception or its studies exception. Therefore, the school district is only permitted to share de-identified information with the PHA, since it did not have written consent from parents or eligible students to

disclose PII from education records to the PHA. The PHA staff and education partners eventually concluded that the de-identified, summary-level information would be sufficient to inform their work on this initiative. The PHA was permitted to share personal identifiers with the school district, according to applicable Federal and State laws, in order to match them with education records and conduct analysis.

The Superintendent shared that while the school district has some analytic capacity for basic, descriptive statistics, it would need to engage with research partners at the local university to conduct analyses that are more sophisticated. The group was supportive of sharing individual-level data with research partners under the condition that data be shared only after they had been de-identified. The group agreed to transmit data through the school district's Secure File Transfer Protocol (SFTP) and assigned staff to develop the written agreement, as well as document the partnership's governance structure.

Formalizing the partnership – The written agreement

To implement the agreed-upon data-sharing model, the PHA and local school district entered into a written agreement. While FERPA only requires a written agreement for disclosures of PII from education records, the PHA and school district used best practices and entered into a two-way agreement that:

- specifies the personally identifiable data that the PHA will send to the local school district;
- specifies that the personally identifiable data are only being shared for research and evaluation that both the PHA and school district agreed to conduct;
- requires that the school district destroy the incoming list of personally identifiable data when it is no longer needed for the purpose specified, and provides a time period for that destruction; and
- establishes policies to protect the personally identifiable data from further disclosure or unauthorized use, including specifying that the school district may not re-disclose the personally identifiable data.

Implementation

The PHA and school district signed their first written agreement, an MOU, to share data, with a one-year term. The data-sharing model was fully implemented three months later. The school district successfully matched children in the PHA's housing to its student information system and reported back de-identified, summary tables of their educational attainment compared with peers who were not in public housing. Although some data were not reported due to small cell size (i.e., some categories, or "cells," of data have so few students in them that a reasonable person in the school community could identify with reasonable certainty who the individuals are), they were able to show metrics by school location and public housing building in most cases.

The group also partnered with the local university on more comprehensive analyses looking at transportation routes and a longitudinal analysis of early indicators of school dropout using de-identified, linked data. The PHA, school district, and education partners formed an advisory committee that meets quarterly to review findings and to create and implement data-informed strategies and interventions.

The PHA and school district have been pleased with the first year's progress and have renewed the MOU. They have set specific targets to improve the educational outcomes of students in public housing over the next three years. The partners are hopeful that they will reach these targets and that, if successful, these improvements will have a significant impact on the district's outcomes overall. Another great benefit of the data-sharing partnership has been improved relationships between the PHA and school district. In the past, they were mostly

in contact to resolve crisis-driven issues, but now they are proactively partnering to better serve children and families.

Option 2: A Partnership Between a Public Housing Agency and the Entity Managing a Local Integrated Data System (IDS)

Forming a relationship with the IDS

The PHA's Executive Director heard about the County's IDS (described below) at a recent community meeting and remembered that the local school district was one of the participating agencies. While obtaining data on educational outcomes is one of her priorities, the Executive Director has also been trying to access other employment and human services indicators (e.g., child welfare, mental health, juvenile justice) that would help inform her agency's work.

She reached out to the local university that manages the IDS (IDS Lead) to learn more about the system and the process to become a participating agency. She thinks that participating in the IDS may be the most efficient way to get access to data from several agencies, and she knows that the local school district has very limited resources to do this work with recent budget cuts.

The IDS Lead provided her with a high-level overview of the system. Agencies that participate in the IDS include child welfare, juvenile justice, and mental health agencies and several local school districts. Agencies participating in the IDS sign an MOU with the university and commit to providing identified, individual-level data to the IDS Lead weekly, monthly, or annually. The personal identifiers are needed to match individuals across data sets. The IDS Lead then links and stores data from the participating agencies in a secure data warehouse to support future program evaluations and research.

The MOUs are agency specific, so the PHA may customize them as needed. The MOU provides the legal framework to share data and creates the capacity for future research and evaluations. Each request to use the integrated data must be approved by all agencies whose data are included in the request, and all such agencies also must sign a separate data-use agreement (DUA) to permit the IDS Lead to have access to their data. A majority of the analysis is conducted by staff of the IDS Lead, and results are shared back in de-identified, aggregate reports. If another party conducts the analysis, then additional written agreements are required to permit the IDS Lead to re-disclose information to that party.

The Executive Director also set up a meeting with the local school district to let it know that her PHA was working to improve the educational outcomes for children in public housing. She invited local school district representatives to participate in the bi-monthly meetings with her education partners. She also asked school district representatives to help develop the PHA's research agenda and to collaborate on developing strategies and interventions to improve the educational outcomes of the children whom they both serve. She explained that she is sensitive to the school district's resource limitations and was therefore exploring a possible partnership with the IDS Lead. This would greatly reduce the expenditure of scarce school district resources on sharing, matching, and analyzing data. The Superintendent and other school district leadership thought it would be a valuable partnership and agreed to participate.

After these discussions, the Executive Director determined that participating in the IDS is the best approach to access educational outcome indicators for children in public housing, as well as other key employment and

human services indicators. The IDS Lead welcomed the PHA's participation as it will make the IDS's housing data more comprehensive and increase its usefulness for understanding housing trends in the region.

Designing the data-sharing model

The IDS Lead has an established data-sharing model that significantly reduces the amount of resources needed to achieve the goals of their partnership.

Formalizing the partnership – The written agreement

Both the PHA and school district have MOUs with the IDS Lead to participate in the IDS. The MOU between the school district and the IDS Lead must comply with the requirements of FERPA's exception to consent that is permitting the school district to disclose PII from education records to the IDS Lead. (Additional information on how a school district may participate in an IDS in compliance with FERPA can be found in the U.S. Department of Education's resource *IDS and Student Privacy*.) An MOU between the PHA and IDS Lead should, at a minimum, include provisions that

- specify the personally identifiable data that each agency will send to the IDS Lead;
- specify that the personally identifiable data are only being shared for research and evaluation, and can only be accessed when there is a DUA signed by all relevant parties;
- require the IDS Lead to destroy the incoming list of personally identifiable data when it is no longer needed for the purpose specified, and provides a time period for that destruction; and
- establish policies to protect the data from further disclosure or unauthorized use, including specifying that the IDS Lead may not re-disclose the personally identifiable data without additional written agreements from the originating agencies authorizing such a re-disclosure.

Each party involved in a project-specific request for IDS data must sign the DUA for the project to move forward. If, for example, the request required PHA and school district data, they would both need to sign the DUA first.

Implementation

The PHA signed an MOU with the IDS Lead and started sharing, on a monthly basis, an extract of its property portfolio management system data with the IDS Lead. The PHA's initial request was for a summary of the educational outcomes of children living in its housing by program, grade, and public housing building. Because they had already discussed it in the most recent bi-monthly meeting of the PHA, education partners, and the school district, the school district was aware of this request. Therefore, when the IDS Lead sent the DUA to the school district for review, the school district was able to quickly sign and return it.

The IDS Lead conducted the analysis and shared the de-identified, aggregate results with both the PHA and school district. One of the first things the group noticed was the low percentage of children in public housing with on-time school enrollment. Improving the rate of on-time enrollment became the group's first priority, since it was the beginning of the summer and prime time for outreach efforts to ensure children were enrolled on time. They noticed that the rates of on-time enrollment were lowest for children entering kindergarten and that a few of the public housing buildings had significantly lower rates than others.

The team came up with two strategies to pilot in the upcoming enrollment cycle. First, the PHA extracted the names and addresses of the parents of children whom the PHA identified as being kindergarten eligible. It gave these to a local non-profit that runs an outreach and engagement program to support families in the transition to kindergarten. It is a voluntary program with a successful track record. The second strategy was to bring school staff to the public housing communities with the lowest on-time enrollment rates for a half-day enrollment event. They partnered with PHA staff to help parents complete the necessary paperwork to enroll children in school, provide other important information to parents and their children, and donate school supplies to ensure families are prepared for the upcoming school year.

While there is still room for improvement, both pilots were a success, and the school district reported higher on-time enrollment for the target groups. The PHA, school district, and education partners are continuing to conduct research and analysis to inform strategies and interventions to improve other educational outcomes including attendance, reading and math proficiency, and graduation rates.