Sharing Student Data Across Public Sectors
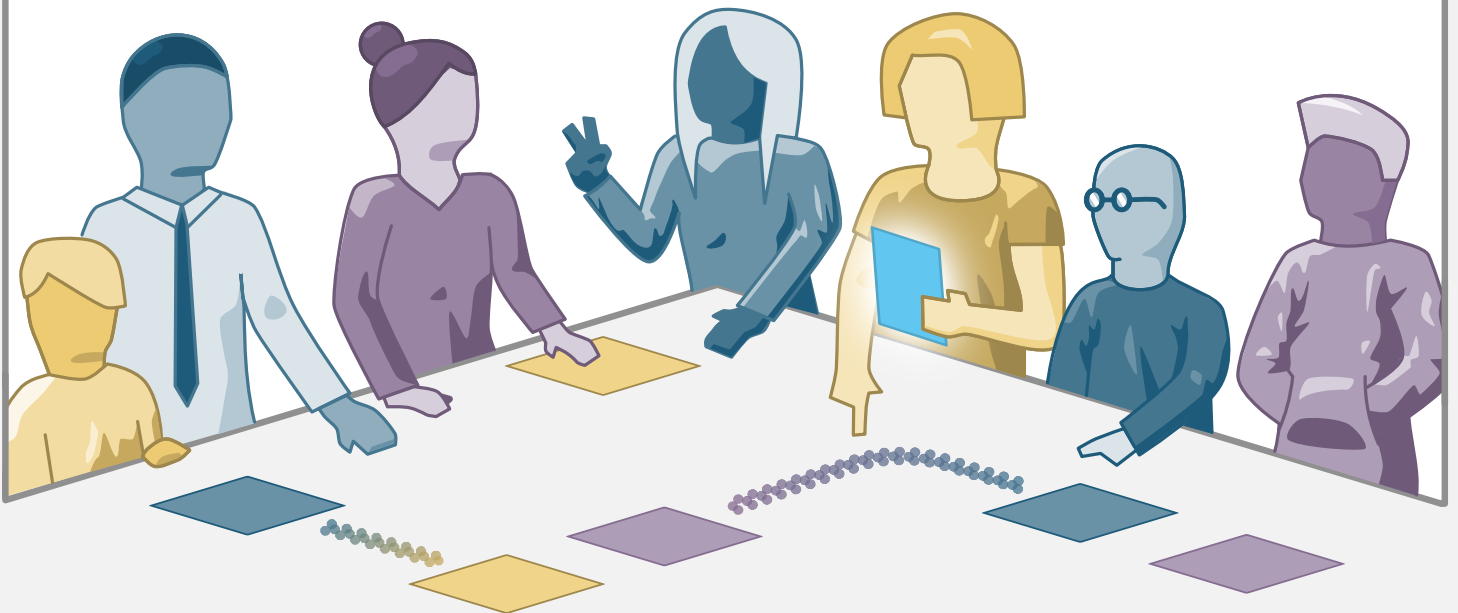
Importance of Community Engagement to Support Responsible and Equitable Use

CENTER FOR
DEMOCRACY
& TECHNOLOGY

The **Center for Democracy & Technology** (CDT) is a 25-year-old 501(c)3 nonpartisan nonprofit organization working to promote democratic values by shaping technology policy and architecture. The organisation is headquartered in Washington, D.C. and has a Europe Office in Brussels, Belgium.

CDT's vision for the **Student Privacy Project** is to create an educated citizenry that is essential to a thriving democracy by protecting student data while supporting its responsible use to improve educational outcomes. To achieve this vision, CDT advocates for and provides solutions-oriented resources for education practitioners and the technology providers who work with them, that center the student and balance the promises and pitfalls of education data and technology with protecting the privacy rights of students and their families.

As governments expand their use of technology and data, it is critical that they do so in ways that affirm individual privacy, respect civil rights, foster inclusive participatory systems, promote transparent and accountable oversight, and advance just social structures within the broader community. CDT's **Equity in Civic Techology Project** furthers these goals by providing balanced advocacy that promotes the responsible use of data and technology while protecting the privacy and civil rights of individuals. We engage with these issues from both technical and policy-minded perspectives, creating solutions-oriented policy resources and actionable technical guidance.

Sharing Student Data Across Public Sectors

Importance of Community Engagement to Support Responsible and Equitable Use

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Introduction

Data and technology play a critical role in today's education institutions, with 85 percent of K-12 teachers anticipating that online learning and use of education technology at their school will play a larger role in the future than it did before the pandemic.[1] The growth in data-driven decision-making has helped fuel the increasing prevalence of data sharing practices between K-12 education agencies and adjacent public sectors like social services. Yet the sharing of personal data can pose risks as well as benefits, and many communities have historically experienced harm as a result of irresponsible data sharing practices. For example, if the underlying data itself is biased, sharing that information exacerbates those inequities and increases the likelihood that potential harms fall disproportionately on certain communities. As a result, it is critical that agencies participating in data sharing initiatives take steps to ensure the benefits are available to all and no groups of students experience disproportionate harm.

A core component of sharing data responsibly is **proactive, robust community engagement** with the group of people whose data is being shared, as well as their surrounding community. This population has the greatest stake in the success or failure of a given data sharing initiative; as such, public agencies have a practical incentive, and a moral obligation, to engage them regarding decisions being made about their data.

However, recent CDT research identifies a large gap between the demand for community engagement efforts and the level of partnership currently taking place: 93 percent of parents of K-12 students in the United States consider it important for schools and districts to engage them about how they plan to use student data, but only 44 percent of parents report that their school or district has actually asked for their input on how to use student data and technology.

This paper presents guidance on how practitioners can conduct effective community engagement around the sharing of student data between K-12 education agencies and adjacent public sectors. We explore the importance of community engagement around data sharing initiatives, and highlight four dimensions of effective community engagement:

- **Plan:** Establish Goals, Processes, and Roles
- **Enable:** Build Collective Capacity
- **Resource:** Dedicate Appropriate People, Time, and Money
- **Implement:** Carry Out Vision Effectively and Monitor Implementation

For each of these dimensions, we unpack the key principles of responsible community engagement and set forth a series of tangible action items for practitioners, denoted in the "Helpful Practices for Public Administrators" boxes. The paper also includes an appendix discussing legal requirements around data, technology, and community engagement. Although this guidance describes specific steps and helpful practices, public agencies might not be able to incorporate all of these practices immediately, so they should be adapted to specific situations to ensure that community engagement starts and continues, even if the conditions are not ideal.

Why Data Sharing Between K-12 and Public Sectors Matters
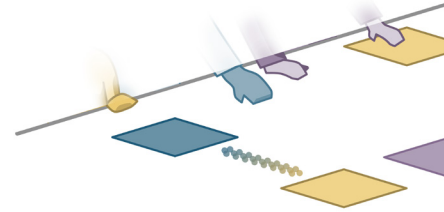
What Is Data Sharing Between K-12 and Public Sectors

Put simply, data sharing in K-12 education refers to the sharing of student level data between K-12 agencies and other sectors, most often social services. Public agencies, including local and state education agencies, may consider sharing data for a variety of reasons, such as satisfying legal and policy demands, conducting research and program evaluation, and providing services more effectively to individuals.[2] Because of these potential benefits, data sharing initiatives are becoming increasingly common among public agencies.

This report specifically examines initiatives that share individual-level data about student populations between K-12 education agencies (schools, districts, local education agencies, or state education agencies) and adjacent public sectors, especially social services.[3] For example, information is often shared between K-12 education and foster care agencies to ensure quality education as foster care children transition between homes. Another example is the increased focus on creating data sharing pipelines between K-12 and workforce preparation programs to ensure students are matched with the best programs for their needs. Although data sharing between K-12 and other agencies has been happening for decades, the risks related to data sharing have increased as there is more personal information available to share and the volume of data sharing has increased.

Who is a Community Member?

A community member is anyone outside of a public agency with a stake in decisions that are being made. As it relates to data sharing, it is particularly important to engage the individuals about whom data is being collected and shared, which is the primary focus of this paper. In the case of K-12 education, that typically entails engaging students and their parents.

Additionally, data sharing efforts tend to focus on the most historically underserved students who participate in public services and systems (e.g., students in foster care, students experiencing homelessness or economic disadvantage), so this paper uses the term parents to encompass all primary caregivers, which could include foster parents, legal guardians, and potentially youths themselves (e.g., emancipated youth, unaccompanied homeless youth). Other community members may also be helpful to engage, but this paper primarily focuses on those who have the greatest stake and have historically lacked opportunities for participation.

Benefits of Data Sharing to Public Agencies and Communities

Student success is influenced by factors that extend far beyond the classroom. Students, especially those from historically underserved communities, may be interacting with and receiving services from multiple public agencies (e.g., housing, foster care, nutrition), so data sharing can have a range of benefits when implemented well. For public agencies and K-12 agencies in particular, data sharing can help inform better policy decisions. For example, sharing data across sectors can help agencies better evaluate service effectiveness based on a broader set of data. This robust information can be used by agencies themselves to direct funding to the most effective services and those areas and communities that can benefit from the most, as well as share this information with academic institutions to support research on the effectiveness of public programs.

In addition to informing policy and programmatic decisions, data sharing can also directly benefit individuals. Data sharing allows for better coordination of services, which can reduce burdens on individuals when procuring services and improve the quality of services provided. Additionally, data sharing can expand the reach of support and services to those who need it most and who might be the hardest to reach, thereby expanding access to public services. The transparent sharing of information also allows communities to make more informed decisions on services they access, advocate for better services, and hold agencies accountable for high-quality service provision.

An example of individual-level data sharing that improves student outcomes can be found in the many states that link K-12 data with foster care systems.[4] Doing so ensures that students have access to education options in a timely manner and are placed in rigorous and appropriate classes even as they may move between homes. This targets K-12 services to students most in need and are hardest to reach, while also allowing foster care agencies to consider K-12 options in making decisions on placements.

Risks of Data Sharing to Agencies and Communities

While data sharing can have substantive benefits for all stakeholders, it presents several risks that should be addressed to ensure data sharing is implemented responsibly and with appropriate precautions in place. Even though education agencies have been sharing data for decades for a range of purposes, initiatives have historically often failed to adequately account for these risks and safeguard the communities the agencies are intended to serve.

Data can be used for a wide range of purposes, including in ways that do not serve the best interests of students or their surrounding community members. One example is data use that limits educational opportunities for students rather than expands them, such as using data to power predictive analytics that direct certain students away from top-performing educational institutions or higher-level learning tracks. Similarly, student-level data shared with law enforcement can be used inappropriately and out of context, resulting in disproportionately high points of contact with law enforcement or disciplinary systems that can in turn erode future opportunities for some students.

At one level, these kinds of problems derive from the quality of data itself — data that is biased or of otherwise poor quality can lead to unjust outcomes, often at the expense of students from historically underserved communities. Sharing this information can exacerbate these harms when it fails to include processes to mitigate against bias or retain the necessary interpretive context from the data source, which might be known most intimately by the community itself. Data sharing that takes place without the knowledge or consent of parents and students, or data that is used for a different purpose than originally planned and to which the subject did not consent, increases the likelihood of this kind of misuse and damages the trust of the community with whom agencies are working.

Finally, data sharing also presents security risks. Data sharing across public sectors increases the risk of a data breach or security incident due to the increased attack surface, which can be worsened without a data incident response plan in place that mitigates harms to communities.

An example of these risks playing out is in Pasco County in Florida, when the school district started sharing student-level data with local law enforcement, including analytics that predict student outcomes (e.g., early warning system information).[5] This created a strong backlash from the community, which had not been engaged in the program design. Community advocates swiftly condemned the program due to concerns around biased impact on policing activity, in addition to the absence of consent, breach of privacy, and other factors. Ramsey County in Minnesota also started to move towards a similar program, but organized community resistance led to it being abandoned before full implementation.[6]

Each of these risks is created or compounded by the fact that the students and other community members whom the data is about are not the ones who are making decisions with the data (e.g., public agencies). The greater the connection between data subjects and data decision-makers, the more likely that data, and data sharing, will be used in a way that benefits the communities. For that reason, it is critical that data sharing initiatives be accompanied by rigorous community engagement efforts for inclusive community voice and agency in the decision-making processes.
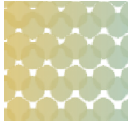
Why Community Engagement Matters

What Is Community Engagement

Engaging students and families has always been an important component of K-12 education, from involving parents in their children's individual experiences to systemic decision-making. As data sharing has increased, so has the need for schools and districts to engage the community in these initiatives.

Community engagement refers to the involvement of stakeholders outside an agency in decision-making processes that impact their lives. It requires resources in terms of people, time, and money, and it may be a legal requirement (see *Appendix*). Regardless of resource and legal constraints, it is especially important to engage the people about whom the data is being collected, shared, and used — which means students and their families.

Community engagement can span a range of involvement and authority, but at its core it seeks to not only provide information to communities, but actively engage them and invite their participation in decision-making (see box on *Community Outreach vs. Engagement*).

Regardless of the form that work with the community takes, it should be an ongoing process throughout all stages of the data sharing life cycle, from the initial decision on whether or not to share data, to how to share data for ongoing evaluations of data sharing initiatives. For more information on the stages of the data sharing lifecycle, please see the box on *Community Engagement Throughout Data Sharing Lifecycle*.

Currently, given the power imbalances and lack of community voice and agency, the benefits of data sharing are not equally available across communities, and the most historically underserved communities disproportionately bear the risks associated with data sharing. Making sure all community members have voice and agency in making decisions can help address these inequities and ensure all community members can benefit from data sharing.

Community Outreach vs. Engagement

Community outreach and community engagement are not synonymous. Community outreach entails public agencies sharing information and communicating with external stakeholders; it is an important, but ultimately insufficient, strategy to support engagement. Community engagement is a two-way, mutually beneficial partnership between public agencies and community members in which questions and concerns are identified, discussed, and decided jointly.

As it relates to sharing data between K-12 and other public agencies, community *outreach* might include building awareness and transparency around planning for and executing data sharing. On the other hand, community *engagement* around data sharing might involve public agencies inviting community participation in the planning and execution process, including evaluating whether data should be shared at all. While outreach and engagement can take many forms, the following are common strategies:

Community Outreach Strategies	Community Engagement Strategies
• Email outreach • Information sessions • Web pages with information • Paper mailings	• Online or paper-based surveys inviting feedback • Participatory Research • Focus groups around key initiatives • Home visits • Advisory councils (e.g., parent advisory council) • Individual meetings with community members

Benefits of Engagement to Public Agencies and Communities

Research indicates that key community stakeholders, K-12 students and their parents, express clear interest in more community engagement and greater inclusion in technology-related decisions, but find that avenues to greater inclusion are unavailable to them. According to CDT's recent survey findings,[7] 93 percent of parents surveyed say

it is important for schools or districts to engage parents/guardians about how they plan to use student data, but only 44 percent say their school or district has asked for their input to inform such decisions. The disconnect between students' desired and actual level of engagement is even more stark: 82 percent of high school students surveyed felt they should have some level of say in the way their data is collected and used, but only 26 percent indicated they have been asked by their school or district for input on data and technology decisions. These findings indicate that education agencies can and should do more to engage their communities when making decisions involving students' data.

Community engagement around potential and/or current data sharing initiatives has several benefits for both agencies and communities.

Benefits to Public Agencies

It is important for public agencies to realize that community engagement is not something they "have to do" but something that is critical to achieving strong outcomes. These benefits include:

- Building trust with the community that will increase buy-in and support of services provided and co-created strategies;
- Meeting agencies' missions by offering better services that attract more participants as well as providing equitable access to services;
- Having the information necessary to allocate resources in the most effective way, thus maximizing service delivery and efficient system design; and
- Minimizing the risks associated with data sharing, including community backlash that could undermine the project.

Benefits to Communities

The community also obtains benefits from engagement, including:

- Provision of services that can be customized to meet the community's needs based on information it provides, ultimately improving the quality of life;
- Greater insight and transparency to understand the services available to community members, as well as data necessary to hold agencies accountable for high quality service provision and efficient resource allocation; and
- Awareness, voice, and agency, which lowers the risk of data being abused.

Given the increasing complexity of data sharing initiatives, it is more important than ever to engage communities to ensure that data and technology support the highest potential of students and families without sacrificing their safety and well-being. The remaining sections of this paper outline key strategies for ensuring effective community engagement related to data sharing initiatives.

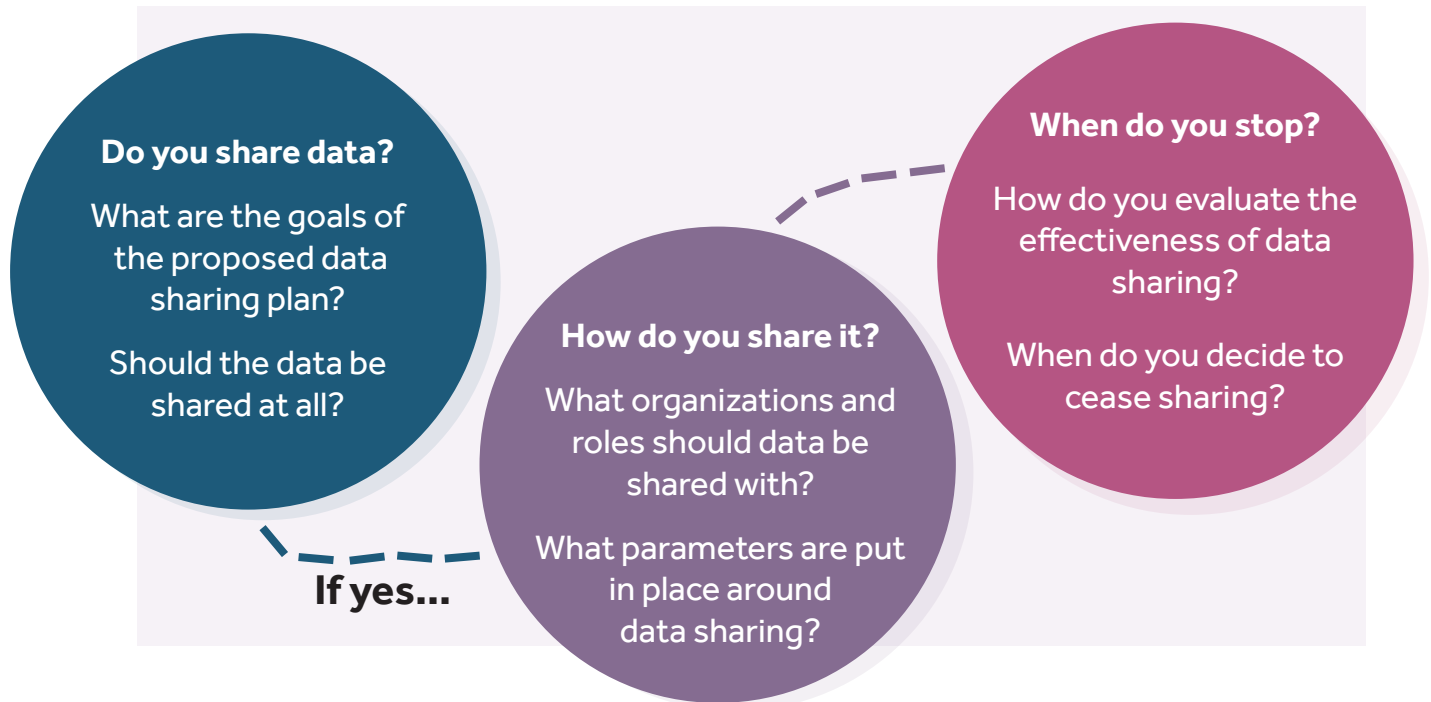# Steps and Helpful Practices for Public Agencies to Engage Communities

Community engagement is not new to education and adjacent social sectors, which means that there are existing best practices that can be implemented when engaging communities around initiatives that entail sharing data across sectors. The following recommendations and emerging practices will assist public agencies in their engagement efforts, but public agencies will likely need to tailor the following steps to ensure their engagement is intentional and appropriate for a given situation.

Effective community engagement will typically involve the following steps:

- **Plan:** Establish Goals, Process, and Roles
- **Enable:** Build Collective Capacity
- **Resource:** Dedicate Appropriate People, Time and Money
- **Implement:** Carry Out Vision Effectively & Monitor Implementation

Community Engagement Throughout the Data Sharing Lifecycle

Although some best practices apply across all stages of data sharing, some important considerations are related to particular phases, including whether to share data at all. For example, research indicates that parents differ in their level of comfort with sharing data across agencies like law enforcement and departments of health.[8] Community engagement must be an ongoing process and take place across the different stages of the data sharing process, including:

Do you share data?

What are the goals of the proposed data sharing plan?

Should the data be shared at all?

If yes...

How do you share it?

What organizations and roles should data be shared with?

What parameters are put in place around data sharing?

When do you stop?

How do you evaluate the effectiveness of data sharing?

When do you decide to cease sharing?

Plan: Establish Goals, Processes, and Roles

To implement community engagement strategies that are intentional, inclusive, and transparent, agencies should collaborate directly with communities at the outset to establish *goals, processes, and roles*. These concepts, defined broadly to reflect different perspectives and levels of involvement, are core elements of a successful plan. Education leaders will establish trust, better meet community needs, receive improved feedback, and increase buy-in if they work with communities to co-create mutually beneficial ways of working together rather than impose unilateral decisions about engagement practices.

Recommendations for Community Engagement

Establish Measures of Success for Public Agencies and Communities

A critical initial step of successful community engagement involves defining what success looks like, for both public agencies and communities. This allows for evaluation and accountability regarding the engagement effort's effectiveness, and extends beyond a simple "check-the-box" review. Delineating measures of success ensures that public agencies not only focus on inputs gathered but also whether their engagement has met community expectations.

Helpful Practices for Public Administrators:

- Set measures of success for engagement that are quantifiable (e.g.,

community attendance at meetings, amount and type of information collected on specific questions, indicators of diverse representation, feedback surveys on the extent to which communities feel heard and information is accurately reflected, length of community members' participation).

- Publicly report measures of success throughout the engagement process to ensure transparency and hold public agencies accountable.
- Solicit participation from communities on defining what success looks like for them, including choosing meaningful measure(s) of success.

Start Engagement Efforts by Identifying the Problems Data Sharing May Solve or New Possibilities It Can Create

Rather than beginning engagement efforts with an assumption that data sharing is necessary, conversations with communities will be more productive if they begin by approaching the problem that data sharing is trying to solve and not assuming that data sharing is the preferred solution. Starting with high-level goals has several benefits, including creating opportunities for the entities contemplating sharing data to articulate how (and whom) this could help. In addition, this can solicit more and better engagement from communities as they can more easily relate to the issue and understand its impact on them.

Helpful Practices for Public Administrators:

- Select problems or possibilities that are bite-sized and easily translated into a set of actionable questions.
- Invite communities to share their most pressing opportunities and needs and whether sharing data across sectors can help.

Work with Communities to Determine How Decisions Will Be Made and Communicated

Public agencies and communities can work together to compose and best implement the feedback, and mitigate potential frustration among communities, by agreeing on and being transparent about how decisions will be made. Community voice and agency can be used in multiple ways by organizations and carry different weights in decision-making processes. In some cases, community voice and agency is one factor that will impact decisions, and in others the community is invited to make decisions through a process that is co-created with public agencies. How decisions are made may also be influenced by whether a data sharing initiative is a new, forward-looking proposal that allows for greater community participation or an existing initiative in which public agencies have

limited discretion (e.g., implementing a legislative data sharing requirement). Additionally, public agencies and communities should work together to establish common expectations about how final decisions will be communicated to the broader public.

Helpful Practices for Public Administrators:

- Ensure that engagement takes a variety of forms (see Engagement vs. Outreach box).
- Pre-establish protocols and agreements around the process of engagement with community members before proceeding with engagement and data sharing itself.
- Include a protocol for surfacing and redressing potential harms to community members should communities experience harm (e.g., data breaches or profiling).
- Tailor communication processes and protocols depending on the current phase of the data sharing lifecycle (e.g., a brand new initiative, a check-in on a long-running initiative, an initiative being re-evaluated, etc.).
- Identify in communications and documentation where and how community voice and agency was incorporated in retrospective analysis and reporting of data sharing decision-making.

Determine and Implement an Ongoing Governance Strategy

Managing the process around community engagement requires determining and implementing an effective and ongoing governance strategy as engagement is not a one-time occurrence. Effective governance includes a core group of people, drawn from both agency staff and community members, who will guide the work and ensure continuity and intentionality in efforts.[*]

Helpful Practices for Public Administrators:

- Establish and publish clear criteria that is used to determine who composes a governance group, as well as their roles.
- Include internal perspectives (e.g., programmatic, privacy, technology, and legal expertise) as well as external perspectives (e.g.,

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[*] For more information on data governance, please see: *Sharing & Privacy Demands in Education: How to Protect Students While Satisfying Policy & Legal Demands*, Center for Democracy & Technology, https://cdt.org/insights/data-sharing-privacy-demands-in-education-how-to-protect-students-while-satisfying-policy-legal-requirements/

community-based organizations, parents, students, education advocates) in governance bodies; both perspectives are necessary for constructive engagement around data sharing.
- Build upon existing governance structures where possible, depending on existing structures, expertise, and historical success (or lack thereof).
- Clarify that the governance group sets the agenda for future community engagement.

Identify Critical Stakeholder Groups and How to Ensure Representation

Parents and youth are not a homogenous group, and research suggests that they have different views across demographics like race, income, and geography. Engagement efforts related to data sharing should involve the diverse perspectives of those who have a stake in decision-making, including public agencies, families, advocates, students, and others. It is important to build in space and time for constructive feedback loops, ensuring these stakeholders are able to engage in ways that work best for them and preventing misunderstanding or even disappointment about their expected role.

Helpful Practices for Public Administrators:

- Identify which stakeholder groups are critical to the process and determine how to best engage them (i.e., foster care student advocates, parents of special education students).
- Provide stakeholders with multiple opportunities, with varying levels of effort, to influence decision-making about data sharing.

Identify and Communicate Public Agencies' Limitations for Engagement

Establishing the scope of engagement helps public agencies identify their constraints, mitigates potential frustration among communities, and directs communities to issues they can influence. Additionally, communicating any limitations is important to establish engagement expectations at the outset. Discussing them can also identify areas for future advocacy to change the limitations that are most damaging to the work.

Helpful Practices for Public Administrators:

- Identify and clearly communicate any limitations on the part of the public agency in planning a data sharing initiative or conducting community engagement (e.g., legislation that mandates aspects of data sharing, budget or timeline constraints, legal limitations around what can be collected, shared, and accessed).
- Identify the areas in which communities can have the biggest potential impact, even if data sharing is mandated (e.g., additional privacy protections that are possible).
- Identify areas to advocate for changing limitations (e.g., policy changes).

Success Story

The California Cradle to Career Data system was born out of a legislative requirement that called for the establishment of a statewide, longitudinal data system and outlined a process for developing a detailed blueprint that included both state agencies and the broader community.[9] More than 200 people from data providers, education institutions, research groups, and community groups met over 18 months and crafted a solution that expands public access to information and ensures communities will have an active role in making meaning of the data.

Enable: Build Collective Capacity

Successfully and robustly engaging communities requires building capacity — both within communities and within the public agencies that seek to engage them. Because this approach is likely a new way of making decisions about data sharing, public agencies need to improve their abilities to partner with communities to receive and incorporate their knowledge and wisdom. Similarly, communities likely require support to engage with public agencies in their efforts to help students and their families, potentially through data sharing.

Recommendations for Community Engagement

Ask Community Members What They Need and Want to Engage

Communities have existing knowledge and wisdom from which public agencies can learn and make better decisions. Therefore, capacity building should not be a one-way dissemination of information but rather a dialogue that allows for deeper understanding,

which incorporates voice and agency from community members themselves as to what they hope to contribute to and get out of the engagement process.

Helpful Practices for Public Administrators:

- Utilize centers of community life, including existing gathering places, to make it more accessible for communities to have voice and agency around what they want and need.
- Partner with local organizations that have credibility and trust within communities, as they are likely better positioned to support direct engagement efforts.
- Include measures of success for whether engagement has met community members' expectations.
- Focus on needs that extend beyond technical and legal capacity and instead are oriented around the problem that data sharing might solve.

Conduct an Assessment of What Public Agencies Need to Engage

To understand their own capacity, public agencies should establish criteria around readiness for engagement efforts related to data sharing, including capacity, awareness of historical context, resources, time to build and sustain relationships, and other factors. Once these criteria are established, agencies should determine the extent to which they meet this readiness criteria and whether additional resources are needed. If additional resources are required, public agencies should attempt to secure those resources, and if they are unable to, they should still conduct engagement with their available resources, even if it is not ideal.

Helpful Practices for Public Administrators:

- Leverage the core group of agency staff who are overseeing engagement efforts to lead this internal assessment.
- Build upon strengths and needs assessments that might already have been completed and are relevant to these purposes.
- Ensure the strengths and needs assessment extends beyond technical capacity and includes additional resources and skill sets like training, meeting management, online survey systems, notetaking, website development, etc.
- Evaluate the agency's commitment to internal transformation, capacity building and establishing long term relationships with community members.

Provide Supports to Invite and Incentivize Engagement

There are a range of barriers that can prevent individuals from engaging in these processes, including language, time, financial constraints, bias, and others. Providing support that addresses these barriers can increase engagement.

Helpful Practices for Public Administrators:

- Ensure that supports are based upon community voice and agency opportunities.
- Allocate financial resources that are needed to offer support.
- Consider the supports and incentives that might be helpful to encourage participation, including but not limited to: childcare, translation, hosting meetings in different languages, providing stipends for participation, transportation, meals, and ensuring multiple times to accommodate different schedules.

Ensure Multiple Modes of Engagement

Community members will likely have different preferences on how they engage in the process for logistical reasons or comfort level with the material. Ensuring a range of modes for people to engage can allow people to choose the mode that works best for them.

Helpful Practices for Public Administrators:

- Consider a wide range of modes of engagement including but not limited to town halls, surveys, small group meetings, participatory research, and online forums.
- Explore bringing issues of data sharing to existing structures for communities (e.g., parent advisory council, parent-teacher organizations) to gather community voice.
- Make information public in several different ways (reports, dashboards, data stories, etc.) so people have tools to educate themselves.
- Ensure that private (anonymous) options are available for participation to encourage community voice where individuals may not be comfortable expressing their opinions publicly.

Success Story

In Florida, the Children's Services Council of Broward County (CSC) led the development of the Broward Data Collaborative** (BDC) to support the Broward Children's Strategic Plan and local partners to create actionable opportunities to improve outcomes for children and families. To address racial equity, CSC has created participatory research opportunities for youth and residents whose data is represented in the BDC data system. Specifically, youth and parents have been co-researchers using their voice and agency alongside system professionals and researchers to inform the design and use of the integrated data system and in how data can be used by partner organization to improve service delivery.

Recognizing the local racially disparate outcomes and the role systems and organizations have had in producing/sustaining disparities, the BDC's participatory research infrastructure has facilitated non-hierarchical, non-segregated, strengths-based conversations and relationships between the youth, community, and partner agencies. The BDC emphasizes community strengths, assets, and possibilities, in addition to challenges and needs, and promotes meaningful opportunities for the community to engage data to co-create a better service systems and communities.

Resource: Dedicate Appropriate People, Time, and Money

Effective community engagement requires substantial resources, including people, time, and money. Without these appropriately in place, community engagement initiatives will not be as successful, which can undermine trust and community relationships rather than strengthen them. Therefore, it is important that agencies plan appropriately for resource allocation before undertaking community engagement efforts. Even if agencies do not have the ideal level of resources they would like, as described below, there are ways to utilize existing resources to engage communities in data sharing efforts as much as possible.

Recommendations for Community Engagement

Secure Agency Buy-In

It is important that all levels of the agency, especially leadership, understand the value of community engagement and the resources necessary to do it effectively as well as the potential changes to agency policy and practice that may be required. This buy-in

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** With funding from the federal Performance Pilot Partnership grant (CFDA #84.420) and local dollars.

will support the appropriate allocation of staff and funding to support data sharing and community engagement efforts.

> *Helpful Practices for Public Administrators:*
>
> - Clearly explain how the purpose of data sharing and related community engagement efforts are necessary to achieve agency leadership's broader goals.
> - Involve agency leadership in the actual community engagement efforts to demonstrate its importance and support from the highest level of the organization.
> - Train leaders in best practices.

Allocate Staff Time to Community Engagement

Community engagement is not a new task for most public agencies, and the majority have staff with this experience. However, engaging communities in decisions about data sharing is likely a new way of making these types of decisions and will therefore require additional staff time to plan and execute.

> *Helpful Practices for Public Administrators:*
>
> - Choose the staffing model that works best for your organization, based on its size, history, and expertise; staffing options include designating one person responsible for this work (this person could reside in a variety of departments, such as Programs, Information Technology, or Data, depending on the data sharing initiative) or dividing this work among several staff.
> - Consider the involvement of additional internal stakeholders who may not lead engagement efforts but could support effective engagement like program leads, legal experts, educators, case workers, etc.
> - Consider the involvement of external stakeholders like existing partnerships with communities and/or facilitation support from outside experts.
> - Leverage existing resources (e.g., expertise, documents, convenings) to get meaningful feedback on data sharing issues while minimizing the need for additional resources.

Allocate Financial Resources to Make Engagement Accessible

The responsibility to make community engagement accessible and ensure meaningful participation belongs to public agencies, which bear the onus to remove barriers to participation and invite community members to come to the proverbial table or be invited to join community tables. Steps to make this feasible for the community can include direct compensation of community members involved in the engagement, compensation of community-based organizations for assisting with engagement efforts, and in-kind contributions.

Helpful Practices for Public Administrators:

- Allocate financial resources and ensure they are included in the budgeting process at the beginning of a potential data sharing initiative.
- Compensate community members for their time, especially when it is an ongoing commitment (such as an advisory group).
- Compensate community-based organizations that assist public agencies with engagement efforts, as they have trust and credibility with communities.
- Allocate financial resources (or secure in-kind donations) to make engagement accessible. This can include providing food, child care, devices (e.g., computers, tablets), transportation, and internet connections.
- Consider external funding sources to support this work (e.g., foundations, government grants).

Allocate Time for Engagement

Strategic project management is critical to the success of any large-scale project, including community engagement and data sharing initiatives. Engagement is most effective when public agencies commit to a timeline that reflects community voice and agency and accounts for iteration and changes of direction if needed. Establishing a timeline helps public agencies and communities set common expectations.

Helpful Practices for Public Administrators:

- Update the timeline and reference it in regular communications, to reflect the iterative nature of community engagement.
- Ensure that any plans explicitly include time for ongoing community engagement, including time for the engagement efforts themselves as well as time to change course based on community voice.

Success Story

The Twin Cities Innovation Alliance[10] recently completed the "No Data About Us Without Us" fellowship pilot. This program was designed to train individuals to be advocates for responsible data sharing within their own communities. This work includes substantive resources, including time (ongoing cohort), staff (trained facilitators), logistical (food, child care) and money (technology, stipends for participants). The fellowship was ultimately able to show it substantively moved participants; understanding of the issues and their ability to act as agents for change in their communities.

Implement: Carry Out Vision Effectively and Monitor Implementation

After planning, enabling, and resourcing community engagement efforts, public agencies should move forward with implementing the vision for community engagement that they have mapped out with their communities. The execution of data sharing-related community engagement will vary based on a number of factors, but there are common emerging practices that will benefit all such engagement efforts.

Recommendations for Community Engagement

Provide High-Quality Training to Agency Staff and Communities

As mentioned above, community engagement around data sharing requires collective capacity building among public agencies and communities. Unfortunately, the harms created by enduring effects of structural racism, ableism, and other oppressive societal forces are well-documented in the legacy of public agencies' interactions with communities they work with; agency staff should be trained in this history and how to mitigate those issues in the future. There is also a growing body of work on the principles that support responsible data use — including community engagement — from which agency staff and communities should draw to inform their data sharing work.

Helpful Practices for Public Administrators:

- Ensure that training topics for agency staff include topics such as implicit bias, cultural humility, structural oppression, antiracism, and other key concepts for pursuing diversity, equity, inclusion, and justice.

- Provide differentiated training that accommodates differing levels of background knowledge, starting from basic components and including more advanced components.
- Consider train-the-trainer models (e.g., community members train community members) to expand capacity.
- Ensure that the person or organization providing the training is a trusted and reliable source and can play a neutral role.
- Align with adult learning best practices, including practicing two-way communication, allocating sufficient time, and using plain language to the degree possible.

Make Resources Accessible

Community members may engage in the process at different times, so agencies should make resources available to help new additions to engagement efforts get up to speed throughout the process. Investing in communications and well-designed resources can ensure that community members know where they are at each step of the journey.

Helpful Practices for Public Administrators:

- Establish a single web-based location that will house all of the resources generated through community engagement efforts.
- Ensure that materials are short, free of jargon, and available in multiple languages.
- Provide an option for community members to get paper copies of resources to accommodate differing levels of technical access.
- Offer community members points of contact and potentially one-on-one time with staff members to understand the process.

Collaborate with Trusted Partners

In cases where there is limited trust between the agency and the community, individuals may be reluctant to engage or participate with full honesty. This can be particularly challenging as it relates to data sharing in communities where prior data sharing agreements have not had buy-in from the community or resulted in data breaches. Bringing in community groups or individuals to co-design, lead, or support the engagement work can build trust and allow for authentic feedback to be gathered from the community.

Helpful Practices for Public Administrators:

- Ask community members where they would go to get information about data sharing across public agencies.
- Meet with trusted community partners before doing direct outreach to communities, so they are equipped to answer questions that may come to them.

Provide Regular Report-Outs on Engagement

It is important that there are regular updates to all stakeholders on the progress of engagement efforts. This helps to build trust in the process, identify any issues early on, and hold all involved parties accountable for their roles in the process.

Helpful Practices for Public Administrators:

- Set a clear schedule and protocol for reporting at the outset.
- Share progress with district leadership and external stakeholders.
- Include community voice as part of information reported.

Be Flexible in Making Adjustments to Engagement

Oftentimes, engagement processes are implemented as designed, regardless of their effectiveness. Instead, agencies should ensure that there is time and space built in to reflect on the progress of these initiatives and make adjustments accordingly. The perspective of community members should be centered in these conversations.

Helpful Practices for Public Administrators:

- Have a clear protocol for reflection and process adjustments.
- Schedule reflection and adjustment points throughout the process, including any additional time this might add to the overall engagement process.
- Involve community members in the reflection and action planning process.

Success Story

The Allegheny County Data Warehouse[11] was designed to bring together data across public and human services to better coordinate care for people served. The county has engaged in data sharing with local school districts since 2011 and works in partnership with districts and community to use that data to improve the outcomes for all students and families. The initial design of the warehouse was based on feedback from both agency staff and community members. Engagement with community groups and the people who are served continues to be a foundational principle in both how the warehouse is designed and how the data is used. The integrated system serves three key purposes: coordinating care to improve outcomes for people, providing more effective services, programs and policies, and creating tools and information to be used as a community resource.

Conclusion

Data sharing has substantial potential benefits, as well as notable risks if it is not done responsibly. Effective community engagement can help support data sharing efforts in maximizing benefits and minimizing risks. Agency staff are often under the pressure of many responsibilities with tight timelines, but the benefits of engaging the community throughout the data sharing process are essential to achieving shared outcomes. The actions outlined here are intended to help administrators most effectively engage the community while balancing their other responsibilities. Even if a situation does not allow for implementing all the suggested practices, community engagement is a critical component of the data sharing that should not be skipped.

Appendix: Federal and State Legislative Trends

CDT reviewed education laws at the federal level and in five select states with notable student privacy laws (California, Texas, Louisiana, Utah, and Illinois) to identify trends regarding legislative requirements around data, technology, and community engagement. In doing so, CDT identified four issues that state and federal laws prioritize related to community engagement regarding data and technology:

- Inform and proactively communicate with external stakeholders, especially parents and legal guardians;
- Involve parents in decision-making about education;
- Engage subject matter experts and other governmental agencies in decision-making processes; and
- Prioritize engagement efforts around marginalized groups.

The following analysis is only illustrative and should not be considered either exhaustive or legal advice.

Issue	Law	Community Engagement Requirements
Inform and proactively communicate with external stakeholders, especially parents and legal guardians	Elementary and Secondary Education Act (ESEA), Title I, 20 U.S.C. § 6311(b)(2)(B)(x)	Requiring states to "produce individual student interpretive, descriptive, and diagnostic reports" for parents and other stakeholders to "understand and address the specific academic needs of students"
	Family Educational Rights and Privacy Act (FERPA), 34 C.F.R. § 99.7	Requiring educational agencies to provide an annual notice to parents of their legal rights under FERPA
	National School Lunch Act (NSLA), 7 C.F.R. § 245.6(h)	Requiring state agencies and local educational agencies to notify parents of programs to share information regarding the free and reduced price lunch program with other state or local agencies
	Protection of Pupil Rights Act (PPRA), 20 U.S.C. § 1232h(c)(2)	Requiring local educational agencies to notify parents about a number of activities, including collection of certain categories of sensitive information, and their right to opt-out
	Cal. Educ. Code § 51101(a)(5), (9)–(11)	Requiring public schools to provide parents with access to information regarding their student's academic progress
	La. Stat. Ann. § 17:406.9	Requiring public schools to provide notice to parents of data collection on certain sensitive topics

Issue	Law	Community Engagement Requirements
Involve parents in decision-making about education	Children's Internet Protection Act, 47 U.S.C. § 254(h)(5)(A)(iii)	Requiring elementary and secondary schools to hold a public hearing for individuals with "a relationship to the school" prior to adopting policies regarding internet safety
	ESEA, Title I, 20 U.S.C. § 6311 (h)(1)(B)(ii)	Requiring states to consult with parents to develop state report cards that are "in an understandable and uniform format"
	ESEA, Title I, 20 U.S.C. § 6318(c)	Requiring schools to involve parents in "an organized, ongoing, and timely way" in the development of local plans under Title I of the ESEA
	PPRA, 20 USC § 1232h(c)(1)	Requiring local educational agencies to consult with parents on policies regarding collection of certain categories of sensitive information
	Cal. Educ. Code § 51101(a)(14)	Requiring public schools to provide parents the right to participate in decision-making bodies at the school
	Utah Code Ann. 53G-7-1202(3)(a)	Requiring school districts to provide for parental participation on school community councils to advise on issues including safe technology utilization and digital citizenship

Issue	Law	Community Engagement Requirements
Engage subject matter experts and other governmental agencies in decision making processes	English Language Acquisition Act, 20 U.S.C. § 6826(b)(4)(D)	Requiring local educational agencies to coordinate with Head Start agencies, including on data sharing, in operating a language instruction education program
	Head Start Act, 42 U.S.C. § 9837(e)	Requiring Head Start agencies to "collaborate and coordinate" with schools in which children participating in Head Start programs will enroll, as well as "the local business community, community-based organizations, faith-based organizations, museums, and libraries to generate support and leverage the resources of the entire local community"
	McKinney–Vento Homeless Assistance Act, 42 U.S.C. § 11432(f)(4)	Requiring state coordinators of homeless services to coordinate with local educational agencies, providers of housing and services for youth experiencing homelessness, and other community organizations
	NSLA, 7 C.F.R. 245.6(b)	Requiring local educational agencies to match data with other government agencies to directly certify eligibility for the school lunch program
	Carl D. Perkins Career and Technical Education Improvement Act, 20 U.S.C. § 2341(a)(2)	Requiring state career and technical education agencies to consult with representatives of businesses and labor organizations on state plans for career and vocational training

Issue	Law	Community Engagement Requirements
	Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk, 20 U.S.C. § 6434(a)(2), (c)(8)	Requiring state education agencies to coordinate with career and technical education programs and local dropout prevention programs
	Cal. Educ. Code § 10855(f)	Requiring input from an advisory board on the creation of a "cradle-to-career" data system, including "students, parents, labor, business and industry, equity and social justice organizations, researchers, privacy experts, early education experts, school districts, charter schools, and county offices of education"
	Tex. Educ. Code Ann. § 239.15(f)(7)	Requiring certified school counselors to develop partnerships with businesses and community groups
Prioritize engagement efforts around marginalized groups	ESEA, Title I, 20 U.S.C. § 6318(a)(2)(D)	Requiring local educational agencies to develop a parental engagement plan to identify barriers to parental involvement for parents "who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background"
	ESEA, Title I, 20 U.S.C. § 6318(f)	Requiring local educational agencies to provide for the informed participation of parents of children with disabilities or limited language proficiency in an accessible format or language

Issue	Law	Community Engagement Requirements
	ESEA, Title VI, 20 U.S.C. § 7424(c)(3)–(4)	Requiring tribal education agencies to submit applications for grants developed and approved by a committee including parents of Native children and tribal representatives
	Individuals with Disabilities Education Act (IDEA), 20 U.S.C. §§ 1412(a)(21)(B); 1414(d)(3)	Requiring states to establish state advisory panels including parents of children with disabilities and to include parents in the "team" to develop individualized education programs for children with disabilities
	IDEA, 20 U.S.C. § 1411(h)(2)	Requiring the Secretary of Interior to coordinate services for students with disabilities with tribes and tribal organizations and provide members of tribes an opportunity to comment on the provision of services to students with disabilities
	Perkins Act, 20 U.S.C. § 2324(d)	Requiring the Secretary of Education to consult with members of "special populations," including people with disabilities, tribal representatives, English learners, children involved in the foster care system, and individuals experiencing homelessness
	Cal. Code. Regs. tit. 5, § 11308	Requiring school districts and schools with large numbers of English language learners to establish advisory committees, to be elected by parents of students learning English

Issue	Law	Community Engagement Requirements
	20 Ill. Comp. Stat. 527/5, 10	Requiring the Illinois Department of Children and Family Services to establish a Statewide Youth Advisory Board, "composed of youth 14 to 21 years of age who are former or current youth in foster care"
	105 Ill. Comp. Stat. 5/14C-10	Requiring school districts to establish a parent advisory committee, composed of parents of student served by "transitional bilingual education programs"
	Ill. Admin. Code, tit. 23, §§ 27.420(b)(5)(C); 28.240(i)	Requiring early childhood special education teachers and teachers of English language learners to collaborate with families
	La. Stat. Ann. § 17:1944.1	Requiring school districts and charter schools to establish special education advisory councils, including parents of students with disabilities and "other special education stakeholders"
	Utah Code Ann. § 53E-9-308(6)(b)	Requiring education entities to provide notice when sharing student data with the Utah Registry of Autism and Developmental Disabilities

Endnotes

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