

Roadmap for Foster Care and K–12 Data Linkages



Key Focus Areas to Ensure Quality Implementation



Where are we going?

By sharing data, child welfare and education agencies can work together to significantly improve educational outcomes for students in foster care.¹ These students are often highly mobile and need the coordinated help of both agencies to make smooth transitions between schools, identify and address educational needs, address attendance and discipline issues, ensure student engagement and successful progression toward a high school credential, and more. States need to securely link key foster care and K–12 data to ensure that students in foster care are supported throughout their education with access to a full range of educational opportunities, including higher education.

Studies demonstrate that students in foster care experience [more challenges throughout their education](#) compared to their peers, such as the following:

- frequent school changes
- delayed enrollment when school changes occur
- higher rates of school suspensions and expulsions
- lower achievement in reading and math
- higher levels of being held back and dropping out
- far lower high school and college graduation rates

Having access to regularly updated student-level data allows child welfare and education staff to help students in foster care achieve school success by providing support such as the following:

- recognizing when students are off track for graduation or successful progression to the next grade level
- helping with timely enrollment and transfer of all full and partial credits when a school change is needed
- identifying the need for targeted educational supports, including services for children with disabilities
- working with school staff to address attendance and discipline issues
- assisting with transition planning to post-high school opportunities such as higher education

Sharing aggregate-level data (e.g., school mobility rates for all children in foster care in a county) among child welfare and state and local education agencies can improve the work of these agencies in the following ways:

- increasing accountability among state and local agencies
- helping stakeholders advocate for better laws, better policies, or increased funding
- identifying systemic problems and creating needed policies or targeted interventions
- tracking progress and the efficacy of interventions over time
- acting as a catalyst to encourage other kinds of data sharing (in compliance with privacy laws), including student-specific sharing and real-time data exchanges to better monitor and support improved education outcomes for children in foster care

Having high-quality data linkages between foster care and K–12 data systems allows states to answer questions such as the following:

- Are students in foster care immediately enrolled in school?
- How often do students in foster care change schools each year?
- What percentage of students in foster care are receiving special education services or are enrolled in advanced coursework compared to students who are not in foster care?
- What are the academic outcomes and on-time high school graduation rates of students in foster care compared to those of their peers?
- What percentage of students in foster care receive suspensions or expulsions compared to students who are not in foster care?
- Are students in foster care consistently receiving services they are entitled to, such as free and reduced-price lunch?
- How should state policies be revised to help students in foster care successfully complete high school prepared for college and careers?

¹ The term “child welfare” is used throughout this document to refer broadly to the system designed to provide care and protection to children who are removed from home due to child abuse or neglect. Under federal law, the “state or tribal child welfare agency” is that agency responsible for administering state plans under parts B and E of Title IV of the Social Security Act. Some states use a state-administered child welfare system, others are administered by counties, and some use a hybrid approach. The term “foster care” and “students in foster care” is used throughout this document to refer to all children under the legal care and protection of the child welfare agency. However, these students could be living in a variety of living placements not just foster family homes. Examples include placement with a relative or kin, living in a group or congregate care setting, or others.



Why does this matter?

By securely sharing limited, critical information about how students in foster care fare in education, child welfare and K-12 agencies at the state and local levels can collaborate to more effectively support these students. Linkages are the connections between data systems that allow information to flow between agencies. High-quality, secure data linkages must be prioritized to ensure that the adults who work in the child welfare and education agencies have the most complete picture of these students' educational experiences.

The Every Student Succeeds Act (ESSA) shines a light on students in foster care and other mobile student populations by requiring states—for the first time—to [disaggregate and publicly report](#) information about their performance. The law opens the door to understanding the well-being of these students by encouraging states to go beyond using data for compliance and use it for continuous improvement. For example, federal regulations for this requirement clarify that in reporting high school graduation rates disaggregated by foster care status, the cohort includes a child in foster care “at any time during the cohort period” (§200.34(e)). Such disaggregation requirements present an opportunity for states to implement high-quality linkages between the foster care and K-12 data systems, providing information to ensure that the learning needs of this vulnerable population are met. ESSA is not the only federal policy change that recognizes the importance of data in ensuring that the unique needs of students in foster care are met (see the sidebar, Federal Momentum around Data Collection and Reporting on Foster Care and Education). In light of the federal changes, now is the time for states to focus on ensuring that they have high-quality foster care and K-12 data linkages to answer critical questions about the education pathways of students in foster care.

Both state and local governments have a critical role to play in ensuring that high-quality data linkages are being implemented. Strong relationships between the two levels of government will be key to the educational success of students in foster care. While states are responsible for reporting on the educational progress of

the population of students in foster care, local data sharing drives practice that can lead to positive outcomes for individual students. States can use data as a conversation starter. For example, states can use the information from these linkages to alter the funding formula and develop state guidance on important issues such as continued or immediate enrollment, identifying children in foster care with special education needs, transferring credits, and suspensions and expulsions. Those who work at the local level can use data resulting from linkages between foster care and K-12 data systems to look at outcomes for students in foster care and determine what services, supports, and practices do and do not work well. Having high-quality information can allow for best practices to be highlighted and emulated. While high-quality data linkages between foster care and education are needed at both the state and local levels, this document focuses on recommendations at the state level for the purposes of having high-quality data to meet federal reporting requirements in annual state report cards.

The child welfare and education agencies can both benefit from high-quality data linkages. Every state can create secure, robust linkages between foster care and K-12 data systems and effectively use the information from these linkages to implement initiatives to support students in foster care, conduct research to answer key policy questions, and be transparent about how the state's investments prepare students in foster care for success in school and beyond. While the linkages are technical mechanisms that enable a state to connect information housed in different data systems, this document addresses the policies and supports that enable a high-quality linkage rather than focusing on the technical aspects of this work. Creating a shared vision and defining roles and responsibilities are examples of the steps states can take to facilitate foster care and K-12 data linkages and are included in the seven key focus areas highlighted in this document. Collaboration among state and local governments, researchers, and other key players will be crucial to ensuring the success of students in the foster care system.

How do we get there?

What does effective implementation of this work look like? The Data Quality Campaign (DQC) and the Legal Center for Foster Care and Education collaborated with a group of child welfare, education, research, and policy experts who work on linking foster care and K-12 data to develop recommendations focusing on the seven key areas listed below. See the Appendix for more details about the expert group, including a full list of participants.

1. Shared Vision: Establish up front a shared vision between the child welfare and education agencies to ensure that the agencies enter the data sharing agreement with an understanding of the

unique role and perspective each has in providing information to better support students. This first step is important for successfully linking high-quality data.

- 2. Roles and Responsibilities:** Develop a structure in which to define the roles and responsibilities of each agency and ensure clear processes and a reasonable timeline for collecting and reporting data and establishing accountability for data quality and security.
- 3. Capacity:** Ensure that all agencies involved have the structure and staffing in place to effectively manage, analyze, and share linked data to take action to support students in foster care.



- 4. Identification and Data Matching:** Develop a deliberate process for securely linking data between foster care and K–12 data systems to ensure a sustainable linkage. These linkages should include a high-quality matching process that allows data about individual children to be accurately and securely linked between data systems and shared with authorized users.
- 5. Data Quality:** Develop a process to ensure that the linked data is accurate and useful. This process includes ensuring that all data elements and terminology are clearly and commonly defined.
- 6. Data Analysis, Reporting, and Use:** Determine which entities have access to the linked data and how the linked data will be analyzed, reported, and used to answer critical policy questions and support students' success.
- 7. Privacy and Security:** Develop strong, multifaceted, and transparent processes to ensure that shared data is safeguarded and consistent with federal and state information sharing law.

Federal Momentum around Data Collection and Reporting on Foster Care and Education

Several significant changes to federal policy support data collection and information sharing between child welfare and education agencies. In particular, the Every Student Succeeds Act (ESSA) requires each state education agency to track and report annually on the educational performance of students in foster care, the Adoption and Foster Care Analysis and Reporting System (AFCARS) requires state child welfare agencies to collect and report on education for children in foster care, and the Comprehensive Child Welfare Information System (CCWIS) must include information sharing between child welfare and education agencies.

ESSA Promotes Success for Youth in Foster Care

On December 10, 2015, President Obama signed ESSA, amending the Elementary and Secondary Education Act. ESSA embeds in federal education law for the first time [provisions](#) that promote school stability and success for youth in foster care and collaboration between child welfare and education agencies to achieve these goals. The act's important protections for students in foster care include requiring state education agencies to report annually on these students' achievement and high school graduation rates. To implement this requirement, child welfare and education agencies will need to work together to ensure the effective, appropriate, and confidential sharing of data and information between systems. More information about how ESSA supports students in foster care can be found on the Legal Center for Foster Care and Education's [website](#).

AFCARS Includes Education Data

On December 14, 2016, final regulations were released by the US Department of Health and Human Services (HHS) revising the data that child welfare systems will be required to report to HHS.

AFCARS is a child welfare data collection system designed to collect uniform and reliable information across the states on the experiences and characteristics of children who are in foster care and children who have been adopted. The AFCARS regulations had not been updated since they were first published in December 1993. In December 2016, significant changes were made under final rule, including the important addition of several elements related to education. For more information about the changes, visit <http://www.childrensdefense.org/library/data/the-adoption-and-foster-care.pdf>.

CCWIS Promotes Data Sharing

In 2016, HHS published the CCWIS final rule, making significant changes to federal requirements related to the automated systems that collect and store child welfare data for state and tribal Title IV-E agencies. The final rule is designed to (1) promote data sharing with other agencies; (2) require quality data; (3) reduce mandatory functional requirements; and (4) allow agencies to build systems tailored to their needs. Specifically, the CCWIS final rule requires agencies that receive federal funds to support foster care efforts to exchange data with other health and human service agencies including education systems and child welfare courts, if practicable. Data exchanges will help coordinate services, eliminate redundancies, improve client outcomes, and improve data quality. To learn more about the requirements, visit <https://www.acf.hhs.gov/cb/research-data-technology/state-tribal-info-systems>.



Future considerations

While states are still developing the capacity to build secure, high-quality foster care and K–12 data linkages, the following suggestions are offered with the future in mind. As they develop these linkages, states can also begin to consider additional ways to improve and build upon them when additional resources are available.

- Explore secure, real-time data sharing to allow for proactive local support (e.g., providing custodial child welfare caseworkers or current foster parents access to school dashboards or portals). The population of students in foster care fluctuates daily, and their needs change regularly.
- Use the linked data to develop tools (e.g., early warning systems) that can identify students most at risk for adverse outcomes (e.g., dropping out of school) so that child welfare or education staff can intervene promptly before it is too late. Allow students in foster care to have access to and use their own data to empower them to take charge of their own education (e.g., provide data access through secure smartphone apps).
- Develop high-quality data linkages with other agencies that support students in foster care, such as mental health or juvenile justice.
- Consider the importance of cross-jurisdiction data linkages (state to state and district to district) because of the high mobility of these students.
- Develop high-quality data linkages between child welfare and postsecondary and workforce agencies to identify strategies to address the challenges of preparing students in foster care for college and career.

Foster Care and K–12 Data Linkages Are Possible in Every State

While most jurisdictions that have taken on efforts to share information between child welfare and education agencies will acknowledge that a great deal of work goes into making it happen, all will agree that the efforts to share data have been well worth it. Interagency data collection and information sharing is especially challenging given the organizational and infrastructure differences between child welfare and education systems. Some states have state-operated child welfare systems, while others are county operated. Meanwhile, there are 14,000 school districts across the country, most of which do not align with only one child welfare agency. The state of Texas has more than 1,400 school districts and independent charter schools and a state-operated child welfare system. The District of Columbia has one public school

district, 118 public charter schools operated by 65 nonprofits, and one child welfare system, and it finds that students in foster care often move between the District and neighboring states.

These are just two examples that demonstrate the wide variability across the country in terms of geographic and structural differences between systems. Each system presents different challenges, but leadership and dedication have allowed for successful information sharing between child welfare and education agencies to improve outcomes for students in foster care. State examples are provided throughout this document to show how different states have taken different approaches to linking foster care and K–12 data.



Shared Vision

The collaborative creation of a shared vision between the child welfare and education agencies is essential to the ability to link and use data to improve the outcomes of students in foster care. Starting with a shared vision ensures that the agencies entering into a data sharing agreement understand the unique role each has in providing high-quality information to realize their mutual goal of better supporting these students.

Why does having a shared vision matter?

A shared vision between the child welfare and education agencies prioritizes improving the education and life outcomes of students in foster care by sharing information that leads to better individual and joint decisionmaking by both agencies. With a shared vision, child welfare and education agencies can work together to understand the impact each has on a student's life and identify the objectives that each agency hopes to achieve through data sharing. Setting mutual goals to communicate critical data points demonstrates an understanding that these students' lives are complex and interconnected across several systems. Data on students in foster care has many limitations, especially due to high rates

of student mobility. Mutual vision setting allows agencies to detect these limitations and identify the most accurate and meaningful data points to exchange.

When child welfare and education agencies create a shared vision, they identify the value of their work in the lives of students in foster care and their vision for improving students' lives. A shared vision drives both child welfare and education agencies to design and use data systems that spur effective actions to support students in foster care. Above all else, a shared vision puts a face to the data points to remind those in each agency of the impact their work has on addressing the needs and outcomes of students in foster care.

What does a strong shared vision look like?

- Each agency involved shares a unique set of information regarding students in foster care to fill gaps and create a full picture of students' needs.
- Agencies demonstrate a collective responsibility for the success of students in foster care, which prevents them from blaming and shaming each other for the challenges these students face.
- Agencies work together to pinpoint where current processes of student support can be improved by each agency.
- Agencies work collaboratively and as equal partners to improve the outcomes of students in foster care and demonstrate impact that goes beyond compliance.

How can a state achieve this?

Creating a plan based on common objectives and processes for communication between the two agencies can ensure the timeliness of critical data points that improve decisionmaking by staff. Child welfare and education agency staff who are responsible for data should know

who their counterpart is in the other agency and what mechanism to use to advance collaboration and lessen areas of misunderstanding or disagreement. Together they can decide how the two agencies will review and use the data they collect and link.



Shared Vision in Colorado

Colorado's shared vision for using linked foster care and education data to inform individual and joint decisionmaking began well before a data sharing agreement was executed. In 2011, the US Department of Health and Human Services and US Department of Education hosted a national [convening](#) that brought cross-system state teams together to create an action plan to strengthen educational supports and services for students in foster care. Colorado's resultant state plan included establishing data sharing agreements and launching a [foster care education program](#) housed within the Colorado Department of Education. The request to share foster care and education data was successful in part because it was modeled after the existing human services and education data sharing agreement in the state. The foster care education program was initially funded with child welfare, education, and private dollars. This joint investment was part of setting a shared vision.

Once the [data sharing agreement](#) was executed, implementation required formalizing partnerships among the state agencies, university researchers, and nonprofit organizations. The partnership developed a guiding statement "to understand the current educational outcomes for students in foster care, factors that affect these

outcomes, and create a map for system level reform." Each organization had a complementary leadership role in using the data and communicating the findings to inform policy and practice. The Colorado Department of Human Services conducted an environmental scan relative to the Legal Center for Foster Care and Education's [Blueprint for Change](#) and convened a steering committee to take a data-informed approach to improving educational stability. The Colorado Department of Education began including outcomes in foster care in state legislative reports. The University of Northern Colorado conducted a series of [studies](#) funded by the Institute for Education Sciences to understand trends in the data and the relationship between mobility and educational outcomes. Nonprofit partners, including Mile High United Way, Morgridge Family Foundation, and Casey Family Programs, helped establish shared messaging, engaged youth in the process, and hosted forums for dissemination.

The shared vision has continued through the adoption of the Blueprint for Change and a state-level steering committee's prioritization of the first two goals, which relate to school stability and seamless transitions. These priorities are reflected in a shared research agenda, policy, and practice focus.

Roles and Responsibilities

Clearly defined roles and responsibilities allow state agencies to adopt a structure in which they can (1) specify how they will support one another around data collection, reporting, and use and (2) create accountability for data quality and security.

Why do roles and responsibilities matter?

Clearly defined roles and responsibilities are necessary for states to have secure, high-quality linkages between foster care and K-12 data systems. A clear structure is essential to bringing the right individuals together to oversee and administer the integration of data across child welfare and education agencies. Because the structure of child welfare and education agencies differs greatly among states, each state may take a different approach to defining roles and responsibilities. All parties involved in the linkages need to feel invested in the work and understand the value of linking and sharing data across these often isolated systems.

Clearly defined roles and responsibilities can serve as the structure within which the child welfare and K-12 agencies establish shared ownership of and support for this critical work

by creating policies and practices around linking and sharing data. They can develop a good working relationship, especially among those who have similar roles in each agency; eliminate technical barriers; and allow for continuing conversations to take place. Including child welfare and K-12 at the table during meetings and policy discussions on a wider range of issues affecting children in foster care (e.g., educating children in residential settings) can also enhance state policies. The child welfare and K-12 agencies are working together to achieve common goals—supporting all children in the foster care system and improving services. Establishing roles and responsibilities helps create an intentional plan to achieve these goals, not only for the child welfare and education agencies but also for the data partners involved.

What do clearly defined roles and responsibilities look like?

- The child welfare and education agencies have high-level support for the data linkages work.
 - The top levels of government (e.g., governor, state legislature, judicial leaders) support systemic collaboration. This high-level buy-in will facilitate review, approval, and fiscal support.
 - Top agency leadership, which may include boards or advisory groups, has bought in.
- The Memorandum of Understanding (MOU) between the child welfare and education agencies is clear from the beginning (see sidebar for more information about MOUs).
- Strong partnerships are established.
 - All relevant stakeholders are represented, including lawyers and other agencies that support students in foster care, such as the court system.
 - Partners outside of the MOU are included in real-time conversations and negotiations that can determine the continued success of the data sharing.
 - Funding for the partnerships is secure.
- A clear point of contact continues to drive the ongoing linkages work on behalf of each agency, and a neutral facilitator is dedicated to the work and can understand the intricacies of both the child welfare and education systems.

How can a state achieve this?

To develop clearly defined roles and responsibilities, a state can start by developing policy questions that can be answered using the linked data. Determining what information is needed and should be provided through data linkages helps the state choose the right agency representatives to work together. In Texas, for example, leaders from the Supreme Court of Texas Permanent Judicial Commission for Children, Youth and Families;

Texas Department of Family and Protective Services; Texas Education Agency; and the University of Texas at Austin School of Social Work have identified [questions to consider](#) for schools, courts, and Child Protective Services on issues from school mobility to dropout prevention. Additional resources about data and information sharing are available on the Legal Center for Foster Care and Education's [website](#).



Memorandum of Understanding (MOU) Tips

Below are some tips for establishing an MOU between a child welfare agency and an education agency for the purposes of linking foster care and K-12 data.

- Determine what data each party wants to share.
- Identify the specific data elements that could be shared and be clear about the meaning and accuracy of each data point.
- Set a clear definition for the cohort of children in foster care that are included (e.g., all children in child welfare custody, all children living in out-of-home care) and a time period for collecting this data (e.g., children in care as of a certain date, at any point during a school year).
- Set clear, realistic, and timely expectations about processes and tasks, what the staffing needs are, and the scope of work.
- Formalize the data governance process at the same time as the data sharing agreement and connect the individuals who have similar roles (e.g., data custodians, data owners, data analysts/researchers) in the child welfare and education systems.
- Determine how often the data will be collected and shared.
- Decide the order of operations for data exchange: Who pulls what data and when? Who gives what data to whom?
- Determine and document what processes and tools will be used for sharing the data securely.
- Consider how many years of data are needed and if the MOU should include sharing prior years of data.
- Develop a plan for communicating what is learned through linked data when establishing the data sharing agreement.
- Decide what kinds of reports and products to develop.
- Develop a clear plan of what will be done with the data after it is exchanged.
- Be flexible; capacity or data needs will change over time.
- Understand who is using the data on the ground and take their insights into consideration.

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Capacity

Linking data between foster care and K-12 data systems is not a one-time project. States need the capacity, including the structures and staff, to keep up the long-term effort in sustaining these linkages and ensuring that they continue to meet people's changing information needs.

Why does capacity matter?

Linking data between foster care and K-12 data systems is often resource intensive; without the right resources, the work cannot be supported or maintained. While the population of students in foster care is small compared to the general student

population, these students face substantial challenges. Strong capacity will allow high-quality data to continue to be linked, maintained, and used to shine a light on important issues that affect them.

What does strong capacity look like?

- The scope of the data linkages work is clear from the beginning. This clarity involves tying the work to specific resources from the state and identifying what dollars are currently available to support the work.
- Both child welfare and education agency staff have a clear understanding of each agency and its structure and workforce. Developing this understanding requires training and representation from both agencies in meetings.
- A trusted, independent organization prioritizes and tracks the data and assumes the role of project manager and mediator between the child welfare and education agencies. For example, both California and Colorado partnered with third-party researchers who were able to support the capacity of the child welfare and education agencies.

How can a state achieve this?

States can look to local agencies or to other states that have an established process for insight into successfully sharing information between child welfare and education agencies. For example, Allegheny County, Pennsylvania, has integrated student and human services data for research and decisionmaking purposes under formal data sharing agreements between the Allegheny County Department of Human Services and 18 local school districts, including Pittsburgh Public Schools, the largest school district in the county. The integrated data provides a comprehensive

picture of students involved in human services and offers greater insight into students, service gaps, and the effectiveness of interventions. Allegheny County has used the linked data to examine issues such as the [impacts of child welfare system involvement on school stability](#). In addition, states such as Colorado, Texas, and many others have included “foster care” flags in their state longitudinal data system. California, Colorado, and Washington state are among the states that have partnered with research universities to build capacity.



Investment in Data Drives Big Change in California

States that are unable to build capacity on their own could consider a partnership with a trusted university or nonprofit organization because they often have the capacity, expertise, and will to ensure high-quality data and conduct critical analysis to inform policies and improve practice. Foster care and education data sharing takes time and resources, but any investment, large or small, pays off.

To understand the education outcomes of students in foster care in California, the Stuart Foundation supported a study that links child welfare and education data to create an educational snapshot for students in K-12. The [report](#), developed by The Center for the Future of Teaching and Learning at WestEd and the University of California, Berkeley, details a “previously invisible achievement gap” between children in foster care and other students, including students with low socioeconomic status, English language learners, and students with disabilities.

Researchers found that students in foster care constituted an at-risk group that was distinct from low socioeconomic students. Students in foster care were more likely than other students to change schools during the school year. Students in foster care were also more likely than the general population of students to be enrolled in the lowest performing schools, and high school students in foster care had the highest dropout rates and lowest graduation rates.

The research findings spurred widespread state attention and reform, including a change to the local control formula governing school funding, which now includes students in foster care as a targeted group in need of support, and a legislative requirement of a biannual report by the state Department of Education on the education outcomes of students in foster care. This example shows how engaging a third party to help with initial data work can lead to longer term improvements in internal capacity within the agency to focus on data exchange and analysis.

Identification and Data Matching

Identifying students in foster care and matching data between systems can be the biggest challenges in creating high-quality data linkages between the foster care and K–12 data systems. Matching is a process that allows the same student’s data to be found in different systems. Many students in foster care also belong to other special populations (e.g., special education), and it is important for the matching process to include this information.

Why do identification and data matching matter?

The population of children in the foster care system changes daily. These students are also highly mobile. Child welfare and education agencies can work together to ensure that the

linkages between their data systems are correctly identifying the population of students in foster care and matching their welfare and education data.

What do strong identification and data matching look like?

- A clear and universal definition outlines what it means to be a student in foster care for the purposes of linking and matching data. States can look to federal regulations or [nonregulatory guidance](#) for a definition.²
- While the federal regulations lay out the definition of “child in foster care,” states may also consider other ways to analyze the data to get a better picture of how students are performing. For example, a state may wish to look at how students in various types of living placements (foster care, kinship or relative placements, congregate care settings, etc.) are doing academically. Or a state could compare how students who have been in care for different periods of time are performing (for example, students who have been in foster care for more than two years compared to those who have been in care for shorter periods of time).
- The most meaningful education outcomes for students in foster care, in addition to the data that is required to be reported publicly in annual state report cards, are defined for each grade level. For example, at the high school level meaningful education outcomes can include grade point average, pass/fail for core courses, any repeated grades, or credit accumulation.
- A student in foster care’s education data may be pulled by the education agency before, during, and after time spent in the foster care system. Sharing historical data is especially important to accurately calculate high school graduation rates disaggregated by foster care status.
- Collaboratively, the child welfare and education agencies identify missing data and determine what pieces of data are complete enough to use.
- Collaboratively, the child welfare and education agencies consider other sectors outside of child welfare and education to match data with to ensure a complete picture of students’ experiences.
- Collaboratively, the child welfare and education agencies look to existing processes for matching data for other special student populations (e.g., special education students, homeless students), consider applying the same business rules, and use the same sequencing of how data is reported. Using existing processes may allow for more accurate comparisons of data across special student populations and a better understanding of the education outcomes of different student groups.
- Expectations for the timeliness of the information included in the match are clearly specified.

2 A “child in foster care” is defined in 45 C.F.R. §1355(a): *Foster care means 24-hour substitute care for children placed away from their parents or guardians and for whom the title IV-E agency has placement and care responsibility. This includes, but is not limited to, placements in foster family homes, foster homes of relatives, group homes, emergency shelters, residential facilities, child care institutions, and preadoptive homes. A child is in foster care in accordance with this definition regardless of whether the foster care facility is licensed and payments are made by the State, Tribal or local agency for the care of the child, whether adoption subsidy payments are being made prior to the finalization of an adoption, or whether there is Federal matching of any payments that are made.*



- The linkages between foster care and K-12 data systems are dynamic and updated more often than once a year. For example, Colorado updates quarterly, and the District of Columbia updates nightly.
- Each student in foster care has a unique student identifier that comes from one clear source (e.g., the state education agency) and prevents him or her from being double counted when data is linked. **Ideally, this unique identifier is used by both the child welfare and education agencies.** But since child welfare agencies do not always collect state student identifiers, accurate linkage often requires a student’s date of birth, first name, last name, and perhaps a geographical identifier (e.g., county) to be used to link

his or her information across data systems. Alternatively, a codebook can be created to crosswalk the unique education identifier and the unique child welfare identifier.

- There is a mechanism to manually review and “clean up” the data match. This review helps child welfare and education agencies identify and correct duplicate records. It also supports a process to identify “near matches” between the foster care and K-12 data systems. This process ensures that, for example, a student named Sam Jones in one data system and Samantha Jones in another data system is the same student by using additional data to determine if these records represent the same student.

How can a state achieve this?

States should actively engage stakeholders at all levels of government and across agencies when preparing to link data between the foster care and K-12 data systems. When looking for support for state-level data sharing between child welfare and education agencies, states can tap existing leadership task forces or commissions where child welfare and education agencies may already be connecting. For example:

- Every state has a Court Improvement Program (CIP), which is funded by a grant from the US Department of Health and Human Services. As a requirement for receiving the funds, every state’s CIP must have a task force that includes leadership from child welfare agencies and courts. Education agencies are often included in the task force. Typical activities include joint agency-court training, linked agency-court data systems, and legislative changes. These task forces are a natural fit for supporting child welfare and education data linkages.
- Most states have a cross-agency data governance body that is responsible for overseeing data matching, sharing, and use across early childhood, K-12, postsecondary, and the workforce. The state child welfare agency can explore being represented in this data governance body to ensure that the needs of students in foster care are being considered in broader conversations and decisionmaking about education data.
- Many states have a children’s cabinet that is made up of heads of government agencies that have child- and youth-serving programs. Members of these children’s cabinets develop shared goals and communicate openly about best practices.
- States already should share data across child welfare and education systems for other purposes, such as identifying students who are eligible for free and reduced-price lunch or early childhood education programs. Existing data sharing agreements can be used as models.



Identification and Data Matching in New York

In New York state, Office of Children and Family Services (OCFS) records of children who are placed in out-of-home care are matched with public school district records, which are reported by the New York State Department of Education’s (NYSED) statewide Student Information Repository System for the purposes of OCFS case management and research. The match rate is approximately 92 percent for the students living in out-of-

home care. Child welfare directory information for students in out-of-home care is transmitted by OCFS through a secure process, and then NYSED securely returns education records for the matched students. Every September, the record match and data exchange occurs for all students in out-of-home care. As children come into care, biweekly matches and data exchange occur throughout the year.

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5

Data Quality

Ensuring the quality of the data included in the linkages between foster care and K–12 data systems is critical to building collaboration and trust in the data used to inform sound decisions in which all stakeholders have confidence. High-quality data follows individual children over time and across the child welfare and K–12 agencies. High-quality data is also accurate, timely, user friendly, useful, comparable, and presented as part of a bigger picture.

The quality of data improves with frequency of use because the information becomes refined and any errors are quickly identified and corrected. Tracking data sources further enhances data quality as inaccurate information or other issues can be reported to the source agency. Professional development in this area can be used to coach case managers, teachers, and staff on how to determine the quality of data they use. High-quality data can be used not only to accurately report on the education outcomes of students in foster care, but also to empower child welfare case workers to have conversations with students in foster care and their schools about having correct information for these students.

Why does data quality matter?

If data is to be used and valued across the child welfare and K–12 agencies, it must be high quality. Ensuring the quality of foster care data is especially challenging given the high mobility of the student foster care population. Communication among agencies is essential to ensuring that high-quality data is being linked across the child welfare and K–12 agencies.

When collecting information, data quality should be considered over quantity. Having high-quality data at the point of a child's

entry into the foster care system reduces the time, effort, and cost of identifying and correcting low-quality data. Accurately recording a few pieces of vital information on student progress and using that information to improve student outcomes allows policymakers, case managers, child welfare case workers, teachers, education leaders, and parents to focus on the most important data and see the value in data linkages.

What does good data quality look like?

- The child welfare and education agencies determine which data source is the best source for each data item (e.g., the K–12 data system is the best source for the student identifier, and the foster care data system is the best source for the date of birth).
- Feedback loops are in place that allow users to report data issues to the agency involved to ensure data quality. Feedback loops also allow information to flow back to agencies to communicate data value and quality.
- Documentation (e.g., codebooks, business rules, manuals, data dictionaries) has been created and centrally stored to ensure accurate data collection and is aligned across foster care and K–12 data systems. Documentation for data entry has been distributed to those responsible for data entry, and guidance has been provided on authoritative sources for data (e.g., vital records). Important indicators are flagged, and both agencies are aware of what they are. Both agencies are transparent about the data definitions being used. For example, does the graduation rate for high school students in foster care refer to the year the student actually graduated or the year in which he or she was expected to graduate? Does the graduation rate include summer graduates?
- A process is in place to systematically examine the quality of the data linkages between foster care and K–12 data systems and ensure that problems get solved iteratively. All discrepancies between the two data systems are highlighted and addressed (e.g., a student's child welfare case worker can change with each disciplinary action).
- The child welfare and education agencies conduct a joint periodic review of the data's accuracy, which allows information technology and agency staff to enhance the system and identify what data is missing or no longer needed.



- The child welfare and education agencies agree on which agency is responsible for each data element and in which direction data sharing happens. Certain data must flow in each direction to ensure a high-quality linkage.
- A well-designed automated system is established and designed around user needs and business practice to support better data collection and allow staff to focus on how they can directly serve students in foster care.

How can a state achieve this?

States can encourage the collection of high-quality data at the local level. States can create feedback structures to report data discrepancies to local agencies and lay the groundwork for effective data linkages and high-quality data.

A key component of ensuring quality data is the alignment of data systems across agencies. The [Common Education Data Standards](#) is one resource for states looking to standardize their data systems for linking and sharing data between foster care and K-12 data systems.

Define Your Terms

Education and child welfare agencies often use the same terms but with different meanings. To facilitate high-quality linkages between foster care and K-12 data systems, agencies can come to a shared understanding of common terms, such as the following:

- assessment
- evaluation
- mobility
- residential
- school type/setting
- caregiver
- facilities
- placement
- school of origin
- transition plan



Data Quality in the District of Columbia

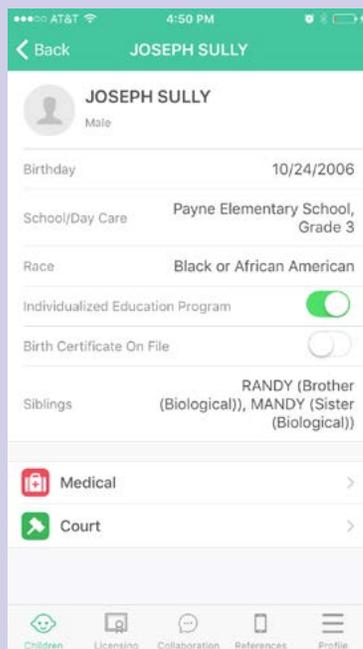
In the District of Columbia, the Child and Family Services Agency (*the state child welfare agency*) and the Office of the State Superintendent for Education (*the state education agency*) entered into a data sharing Memorandum of Agreement. The parties to the agreement developed interoperability between the Statewide Longitudinal Education Database System and the State Automated Child Welfare Information System to allow for secure automated information sharing. Once daily, a match is run directly to a feed accessible by both agencies to create a comprehensive list of students in foster care enrolled in school in the District.

At the outset, the partner agencies met and formed an Interface Control Document to define and map data points to share. Next, a match system was defined based on unique identifiers. This match generates an error report for each agency to rectify any data discrepancies.

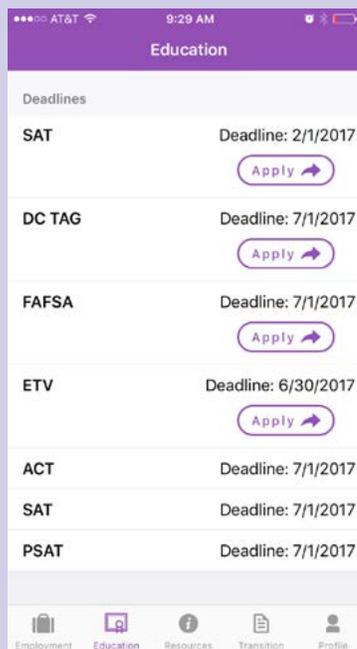
This interoperability enables the education agency to access information about students in foster care, including up-to-date contact information for the case worker, and it enables the child welfare agency to access current enrollment information and other educational outcome data.

In addition, the child welfare agency is able to make requests for student-level educational outcome data (such as attendance, grades, standardized test scores, and grade point average) upon completion of each school term. The data allows the child welfare agency to (1) share the information directly with case workers to inform case planning; (2) work with the school directly to evaluate appropriate school placement or necessary intervention to stabilize school placement; and (3) make data-driven decisions regarding systemwide resources.

The child welfare agency securely shares this education information directly with the foster parents and youth through the use of mobile applications—the Foster Parent App and the Youth App. See below for screenshot examples.



Mock Foster Parent Profile



Mock Youth Profile



Data Elements To Share

Below is a list of some data elements our expert group recommends could be shared between child welfare and education agencies. They are a mix of both local and state data elements. As described in this section, jointly determining not only *which* elements should be collected and shared but also which agency is the best *source* of the element is important.

FROM EDUCATION AGENCIES

STATE-LEVEL DATA

- Demographic indicators (race, ethnicity, gender, English language learner status, free and reduced-price lunch status)
- Special education status
 - ➔ Type of disability the child has
 - ➔ Whether the child has an Individualized Education Program
- Participation in state annual assessments in reading and math
- Academic achievement
 - ➔ Standardized test scores
 - ➔ Whether the child repeated a grade
 - ➔ Graduation/anticipated graduation
- Attendance
- Type of school placement (neighborhood district, charter, residential, alternative education)

LOCAL DATA

- Discipline records
- Enrollment history, number of school moves, and reasons for those moves
- Transportation provided by the local education agency
- Whether the child is in career technical education
- Whether the child is in gifted and talented education
- Leaver status: whether the child graduated
- Kind of educational setting the child is in (classroom setting, self-contained classroom, virtual school program)
- Credits in core courses or pass/fail on core courses
 - ➔ Credit accumulation toward graduation
- School quality
- Course completion: whether the child completed college-ready coursework
- School of origin
- Type of schools the child has attended, including whether this child attended an alternative or charter school
- Whether this child had any early childhood education experiences

FROM WELFARE AGENCIES

- Name and contact information for child welfare case worker
- Length of time in care
- Type of living placement
- Number of out-of-home placements
- Whether the child is in kinship care (staying with relative)
- Whether the child remained in the same school when entering and while in foster care
- Whether the biological parent is still making education decisions
- Whether there is a person appointed or designated to serve as the child's education decisionmaker
- Whether the child had a history of truancy prior to entering foster care

Data Analysis, Reporting, and Use

Data analysis, reporting, and use allow teachers, case managers, child welfare case workers, education leaders, researchers, and other partners to answer questions about the progress students in foster care are making academically and the progress of the education system at large.

States need to ensure that they can meet federal reporting requirements, but linking data between foster care and K–12 data systems should be done for reasons beyond compliance. States should consider who will have access to the linked data (including differentiating access to individual student-level data and aggregate data) and what questions need to be answered through their analysis of this data. Additionally, states should determine how the results of data analysis will be delivered to stakeholders, including the public, so that vital information necessary for decisionmaking is available while individual student data remains protected. Data analysis, reporting, and use should have meaningful purposes for both child welfare and education agencies and must lead to actionable data that improves decisionmaking around students in foster care.

Why do data analysis, reporting, and use matter?

Data should be used to make the best decisions to support students in foster care and their education. Analysis of data on foster care students is key to finding solutions for identified challenges and policy issues. Reporting the findings of data analysis allows policymakers, child welfare case workers, foster

parents, and other stakeholders to take action. When foster care data is linked to K–12 data and used to meet the needs of students in foster care, support for the practical use of linked data can grow.

What do high-quality data analysis, reporting, and use look like?

- All agencies involved determine at what level to report data, how high-quality data is made available at local levels, and who has access to what data and when.
- State and local governments work together to specify the levels of analysis, reporting, and use at the state and local levels. The state can be responsible for conducting research, allocating resources, and identifying best practices that can be shared.
- All agencies involved determine how to disaggregate data by items such as race/ethnicity or length of time in care so it is actionable for both child welfare and K–12 agencies.
- Data is structured differently for research and evaluation versus operational use (e.g., caseworkers' access to education records).
- Agencies take a collaborative approach to identifying data uses that include child welfare, K–12, researchers, and key partners (e.g., universities, nonprofit organizations that support students).
- Data can be cross-tabulated to uncover patterns for different populations of students in foster care. For example, the length of time in care can be analyzed by students' race and number of suspensions/expulsions.
- Data on students in foster care can be compared with data on other subgroups of students and the student population as a whole.
- Research has a clear purpose, which allows agencies to think about reporting in different formats for different audiences (e.g., dropout prevention office; special population information).
- States complete their reporting requirements as mandated by ESSA.



How can a state achieve this?

States can lay the foundation for secure and accessible linked data by creating data access policies that answer the following questions:

- Who has access to the data?
- What data do they have access to?
- How do they have access to the data?
- Why do they have access to the data?

To guide data analysis, reporting, and use, states can develop a set of questions to be answered with linked data. These questions may include the following:

- How is length of time spent in care associated with education outcomes for students in foster care?
- How prepared are students in foster care for college and career?
 - What challenges have students encountered?
 - What milestones has each student reached?
- Is the data used to help mobilize resources on behalf of the students who need them most?
- Is the data used to inform program planning and policies?
- What capacity exists to actually make use of whatever linked data the state is able to produce?
- Is the analysis of data valid?



Data Analysis, Reporting, and Use in Texas

In a state as big and diverse as Texas, marshaling the people and resources to help students in foster care achieve better school outcomes is a monumental task. In 2010, leaders of the Supreme Court of Texas heard the call to improve education outcomes for the approximately 30,000 children and youth in the state’s foster care system. They took action by forming the **Education Committee** of the Permanent Judicial Commission for Children, Youth and Families to identify improvement areas and by issuing an order for child welfare, education, and other leaders to participate in the committee.

The Education Committee led subcommittee and workgroup discussions over an 18-month period with more than 100 high-level court, education, and child welfare leaders in Texas. These discussions led to the creation of a plan named the *Texas Blueprint: Transforming Education Outcomes for Children and Youth in Foster Care*. The blueprint outlines 130 recommendations to improve school experiences for children in foster care. The recommendations are based on seven areas that the Education Committee identified for improvement: judicial practices; data and information sharing; multidisciplinary training; school readiness;

school stability and transitions; school experience, supports, and advocacy; and postsecondary education. An implementation task force was then created to prioritize and implement the recommendations across these seven areas. The task force formed three workgroups, including one on data and information sharing. One of the key recommendations is to “improve child-specific information sharing to ensure that all agencies and stakeholders have the necessary information to serve the education needs of children and youth in foster care.” Improving student-level data will in turn allow for stronger analysis, reporting, and use.

According to the *Texas Blueprint Implementation Task Force Final Report* from February 2015, 82 percent of the 130 recommendations are now either complete or are well under way. This impressive progress shows the state’s ownership of the issue and the commitment of various systems to change and work together. Together the Education Committee and implementation task force created a collaborative, multisystem framework to help encourage better education outcomes for students in foster care in Texas.

Privacy and Security

Methods to ensure data privacy and security must be in place, particularly when dealing with potentially sensitive information about students in foster care. These strategies should be multifaceted and transparent so all stakeholders understand how information is kept secure. Privacy laws and the data security practices of both child welfare and education agencies must be considered to ensure compliance with federal and state regulations.

Why do privacy and security matter?

If child welfare case workers, foster parents, teachers, education leaders, and others do not feel that foster care youth data is being kept secure, they are unlikely to support data collection and linkages between foster care and education data systems. The actual security of data, as well as the transparency about data security processes and procedures, is essential to ensuring

that all stakeholders are both comfortable with and understand how this data is being safeguarded. Creating clear data privacy policies that are consistent across agencies and aligned with federal and state privacy laws is essential to ensuring data security and support for foster care and education linkages.

What do strong privacy and security look like?

- Protections required by the Family Educational Rights and Privacy Act (FERPA), a federal law that protects the privacy of student education records, and any relevant state laws are fully integrated into systems and processes and understood by agencies and stakeholders. Those who are working with the data are aware of all federal, state, and local privacy legislation (especially FERPA and the Health Insurance Portability and Accountability Act) and the interplay between these laws. They are also aware of how state laws affect the sharing of information and specific exceptions governing research studies.
- Who has access to what information and what should be done with it are clear.
- Procedures to handle data breaches are in place and clearly specified for all users and the public.
- The state ensures that those who work in foster care are aware of federal, state, and local privacy legislation to protect education records.
 - All who work in foster care and education are educated on special privacy considerations for students in foster care and foster care families to protect the privacy of child welfare records.
- A data inventory or data classification (e.g., data dictionary) defines each data element collected and stored by the state.
 - The inventory or classification is regularly reviewed and updated.
 - Levels of data sensitivity are clearly defined, and data is categorized by these levels, with corresponding differences in levels of protection depending on the sensitive nature of the data.
 - Definitions recognize that although all student data may be considered sensitive, some pieces of data may be considered more sensitive (e.g., special education status) than other pieces of data (e.g., aggregate graduation rates available to the general public).
- State leaders clearly communicate to the field that securely linking key data between foster care and K–12 data systems is in compliance with the law. This formal communication can provide clarity that data privacy and security issues can be addressed and concerns about privacy do not have to prevent data sharing.
- State leaders discuss how information can be de-identified, when necessary, for further analysis and for reporting purposes.



How can a state achieve this?

Safeguarding student information is critical to developing linkages between the foster care and K-12 data systems. States can ensure that the data collected about students in foster care is secure by putting strong data privacy policies in place and aligning these policies with the Family Educational Rights and Privacy Act (FERPA) and other federal and state laws, including those addressing the privacy of foster care data and information. Data privacy policies and practices should be clearly communicated to child welfare case workers, teachers, foster parents, education leaders, and other stakeholders.

Several resources are available for states developing privacy policies and procedures. The US Department of Education Privacy Technical Assistance Center's [website](#) and the Family Policy Compliance Office's [website](#) provide

information about FERPA and other federal laws that provide parents and students with privacy rights (see, for example, *Integrated Data Systems and Student Privacy*). The Data Quality Campaign's (DQC) *Roadmap to Safeguarding Student Data* provides specific, practical recommendations for prioritizing the safeguarding of student data and continuously reviewing and updating data privacy policies and practices to address changes in technology. DQC's *Complying with FERPA and Other Federal Privacy and Security Laws and Maximizing Appropriate Data Use* is a tool for aligning new privacy policies with existing federal and state laws. Additional resources, including question and answer fact sheets on the Uninterrupted Scholars Act and FERPA and resources on information sharing, can be found on the Legal Center for Foster Care and Education's [website](#).

Information Sharing under the Uninterrupted Scholars Act (USA)

USA became law on January 14, 2013. USA amended the Family Educational Rights and Privacy Act (FERPA) to permit educational agencies and institutions to disclose to state and tribal child welfare agencies, without parental consent or the consent of an eligible student, the education records of students in foster care. USA permits this data to be used for direct service and case planning purposes. The law also amended the requirement that educational agencies and institutions notify parents before complying with judicial orders and subpoenas in certain situations. This legislation helps ensure privacy protections for children and families and helps facilitate more efficient data sharing

pertaining to children in foster care between child welfare and educational agencies, a critical component in ensuring school stability for these youth. Information sharing under USA improves opportunities and outcomes for individual students by ensuring prompt enrollment, appropriate placement and services, credit transfers, and other key factors. Opportunities are expanded to identify systemic problems and develop effective policies and targeted interventions. USA also facilitates stronger collaborations among systems and permits systems to track progress and interventions over time through longitudinal data.



The Data Quality Campaign is a nonprofit policy and advocacy organization leading the effort to bring every part of the education community together to empower educators, families, and policymakers with quality information to make decisions that ensure that students excel. For more information, go to www.dataqualitycampaign.org and follow us on [Facebook](#) and [Twitter](#) (@EdDataCampaign).



The Legal Center for Foster Care and Education, a project of the American Bar Association Center on Children and the Law, Education Law Center, and Juvenile Law Center, provides training and technical assistance on data and information sharing. The Legal Center provides examples of what has worked in other jurisdictions, assesses legal strategies, and assists in drafting memoranda of understanding that delineate the role of each stakeholder, protect children's and families' privacy rights, and ensure quality and reliability.



APPENDIX

In August 2016, the Data Quality Campaign (DQC) and the Legal Center for Foster Care and Education embarked on a project to define what a quality linkage between state foster care data systems and K-12 data systems looks like. DQC and the Legal Center identified the experts listed below to develop the experience-based recommendations that are outlined in this roadmap. These experts represent states and organizations that have emerged as leaders in creating high-quality linkages between foster care and K-12 data at the state level. The experts participated in an introductory conference call in September 2016; met once in person in Washington, DC, in November 2016; and helped develop and refine the recommendations. States that are looking to develop strong linkages between these two sectors can build on the lessons that these leaders provided in this roadmap.

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Dian Carroll	US Department of Health and Human Services, Administration on Children and Families, Children’s Bureau, Department of State Systems
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Megan Fletcher	Child and Family Services Agency, Washington, DC
Leslie Gross	Jim Casey Youth Opportunities Initiative
Cindy Guy	Annie E. Casey Foundation
William Henderson	Office of the State Superintendent of Education, Washington, DC
Kristin Kelly, Kathleen McNaught, and Emily Peeler	American Bar Association Center on Children and the Law, Legal Center for Foster Care and Education
Emily Kulick	Formerly with the US Department of Education
Judith Martinez	Colorado Department of Education
Maura McInerney	Education Law Center; Legal Center for Foster Care and Education
Leigh Mountain	New York State Department of Education
Tiffany Roper	Texas Department of Family and Protective Services
Terry Shaw	University of Maryland, School of Social Work
Claire Strohmeier	New York Office of Child and Family Services
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