



July 29, 2020

Kathy Booth, Project Director
Cradle to Career Data System Workgroup Members

Re: Public Comment on Progress of Development of Cradle-to-Career Data System

Dear Ms. Booth and Workgroup Members:

As a long time advocate of the Cradle-to-Career Data System and a member of its Policy and Analytics Advisory Group, California Competes: Higher Education for a Strong Economy appreciates the Workgroup's progress so far towards the development of the data system. Data sits at the core of our work. The data system is critical in illuminating students' pathways from K-12 to postsecondary and into the workforce. Every transition point in the education-to-employment pipeline presents an opportunity to improve student outcomes by making state policy or institutional practice decisions based on accurate information. Additionally, it would allow us to better understand how the current pandemic impacts Californians and how we can address those needs.

As a result, this letter provides recommendations on what we believe would strengthen the data system as it ensures greater accountability for the deep investments the state makes in higher education and beyond, and advances programs and services that deliver equitable results. Specifically, the data system should:

Illuminate the challenges of overlooked small populations.

Data on groups with smaller numbers are often hidden to protect student privacy, but this also means that these groups are often dropped from analyses, leaving their needs hidden too. As a result, it is even more critical for the statewide longitudinal data system to access confidential individual-level data for researchers. If we had a system with this access, our estimates would be more reliable for small populations, as they would represent a census of Californians. We could more confidently use analyses from those data to understand the status of opportunity across the state and better support these populations, while working with researchers to protect individual identities.

Be governed by an independent entity.

The data system should be governed by an independent entity, not a federated system governed by the entities contributing data. Independent governance promotes rigor and transparency, as the entities contributing data may face conflicts of interest in promoting access to the data, particularly to researchers seeking to analyze their activities.



We appreciate your time in reviewing our recommendations and hope they provide some guidance as you continue developing the state's first longitudinal data systems. This data system that includes Californians from birth through the workforce would facilitate better analyses of opportunity across the state and address the challenges they face.

Thank you,

Dr. Su Jin Jez
Executive Director