DATA-SHARING

FEDERAL RULES AND BEST PRACTICES TO IMPROVE OUT-OF-SCHOOL-TIME PROGRAMS AND STUDENT OUTCOMES

PARTNERSHIP FOR CHILDREN AND YOUTH

SUMMARY

The task of meeting the needs of all students and providing a well-rounded education is an extraordinary challenge, and at a time of shrinking resources and increased accountability, schools cannot do it alone. Research has shown that high-quality out-of-school time (OST) programs — a range of programs to promote and enhance the development of youth outside the regular school hours including afterschool and summer programs — can have a measurable impact on the academic success and well-being of students. Thus, these programs are increasingly being relied upon as a key strategy to close the achievement gap and improve low-performing schools.

Research and experience tell us that coordinated data-sharing between schools and OST partners can improve the quality of OST programs and provide better learning outcomes for the students they serve. Unfortunately, the primary federal policy that protects the security and confidentiality of individual student information, known as *Family Educational Rights and Privacy Act* (FERPA), has consistently been cited as a roadblock for school systems and their OST partners to share student data in a coordinated approach to improve education programs and student outcomes. This policy brief seeks to demonstrate that FERPA *can* allow for data-sharing between schools and OST partners, and why it is a best practice to do so. By outlining examples from the field, this paper aims to pave the way for more OST programs and their school partners to use student data to improve educational outcomes and opportunities for all students.

ACKNOWLEDGEMENTS

Expanded Learning & Afterschool Project

This publication was authored by Jessica Gunderson and developed with support from The Charles Stewart Mott Foundation, in partnership with TASC and the Collaborative for Building After-School Systems (CBASS). PCY thanks THINK Together and Chicago Allies for Youth Success for their insight and support on the development of this document. Thanks to Janice Shiffler for her contribution to the finalization of this document. PCY would also like to thank the Penn Hill Group for their input and review, and Kenji Liu for the report layout.

A WIN-WIN: DATA-SHARING HELPS OST PROGRAMS IMPROVE STUDENT LEARNING AND PROGRAM QUALITY

There is increasing attention at all levels of our education system to breaking down barriers to student achievement and improving low-performing schools. These efforts have led to an expansion of strategies that leverage increased learning time to improve student success and achievement. A rich body of research shows that out-of-school time (OST) programs are effective approaches to improving academic achievement, increasing school attendance and engagement, reducing dropout rates, and providing students with the 21st century skills they need to be successful and healthy.[1]

A study of OST programs by the RAND Corporation found that data systems are essential to increasing access to programs, improving the quality of services, and developing program sustainability.[2] It seems intuitive in an age of increased technology that students and families would be best served when OST programs and schools are sharing information in a systematic way. But, with the challenges of navigating legal issues and having limited financial and technical resources, data sharing is happening less often than one would hope. According to a several studies published in 2012, only 38 percent of OST providers "regularly or frequently" share data with schools, and less than a third of OST providers were using data systems to track student participation and other key indicators.[3] The need is clear — surveys of both city officials and OST organizations cited developing and having accurate information-sharing systems as the biggest need and area of interest.[4] Contributing to the increasing demand and recognition is a growing body of best practice research on developing information-sharing systems between schools and community partners, identifying and overcoming common challenges, and the benefits of a coordinated approach to student and family engagement.[5]

Commonly cited benefits of data-sharing between OST providers and schools include:[6]

- **Developing Targeted Programs.** When districts and afterschool providers share data on student and community demographics, they are able to more effectively target limited resources to the schools, communities, and students most in need. Assessments at the district or community level can identify gaps and redundancies in existing and potential programs. This includes targeting schools and communities that could particularly benefit from participation in afterschool and summer programs.

- **Program Improvement.** With updated and comprehensive student- and site-level information, providers are able to promote continuous program improvement. These data can inform program design improvements, professional development needs, and management decisions.

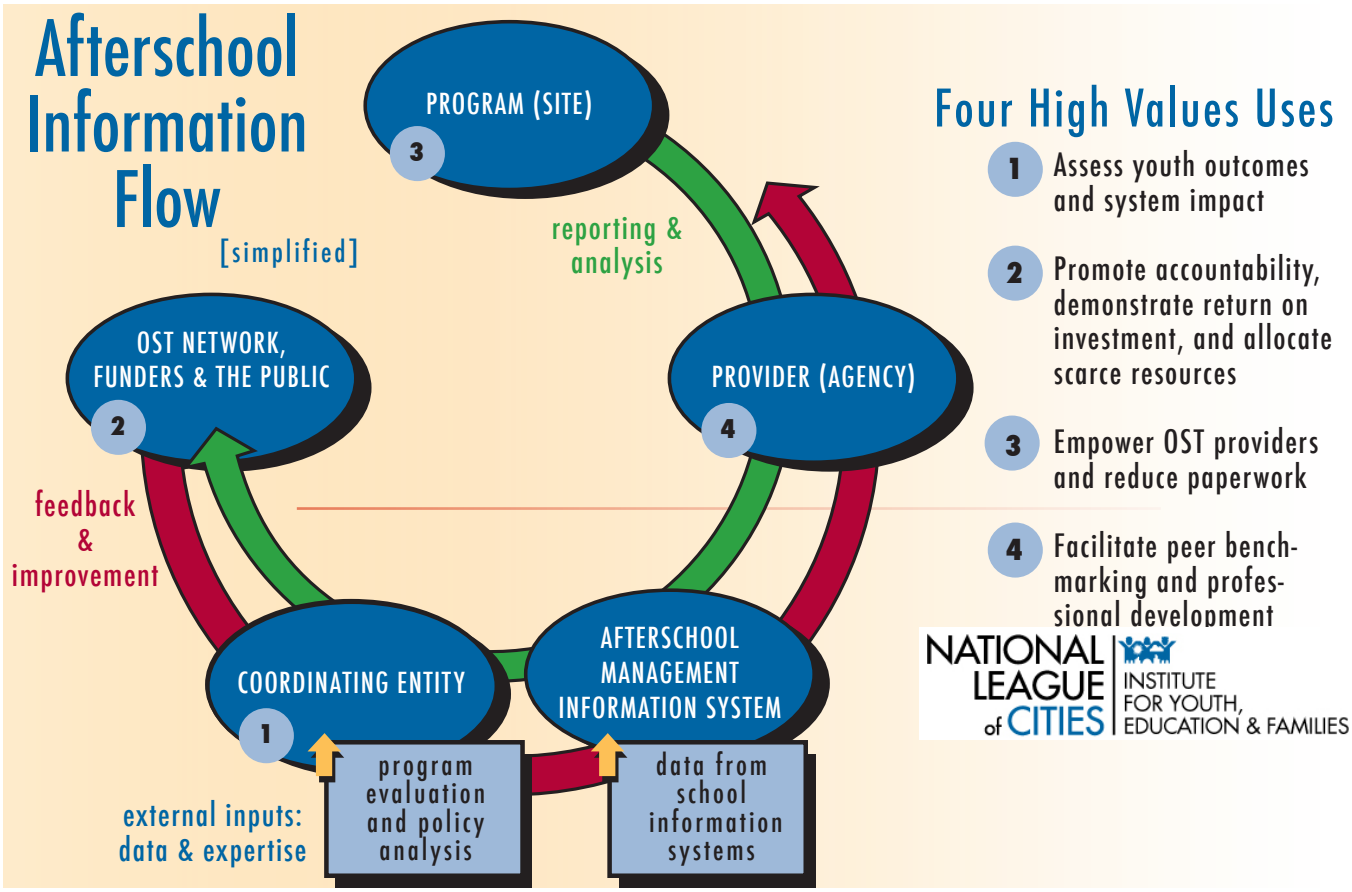
- **Increased Alignment between OST and the School Day.** Data-sharing allows for enhanced curriculum, planning, and staff cohesion on how to complement and support each other to build on school and student needs and strengths.

» **Ability to Assess Program Impact.** With increased accountability and fewer resources, data-sharing on student attendance and academic achievement allows for more transparency on the impact of OST programming on student outcomes. With data-sharing agreements in place, some reporting burdens can be taken off cash-strapped districts and done in partnership with community-based organizations.

The National League of Cities developed a chart to illustrate the flow of information between the various stakeholders (districts, schools, program providers, evaluators) and the key outcomes associated with how data can be used to improve program quality and student outcomes. (See figure 1.) This chart applies to cities where there are multiple inputs of data and a coordinating entity. It does not necessarily apply to all school and OST data-sharing systems.

FIGURE 1: AFTERSCHOOL INFORMATION FLOW

Source: National League of Cities, Building Management Information Systems to Coordinate Citywide Afterschool Programs: A Toolkit for Cities (2012)



CLEARING A HURDLE: CHANGES TO FERPA ALLOW MORE OPPORTUNITIES FOR DATA-SHARING

A significant number of OST programs are operated collaboratively by schools and community-based partners (e.g. private non-profit organizations or public agencies such as cities). Again, research identifies regular data-sharing between schools and OST programs as a key element of effective partnerships.[8] Unfortunately, the federal student data privacy law, known as the *Family Educational Rights and Privacy Act* (FERPA), has been a longstanding and misunderstood obstacle for systemic information-sharing between schools and OST programs. In fact, FERPA was cited by states as the most common barrier to using and sharing data to improve student educational outcomes.[9]

Fortunately, in January 2012, after several years of review by federal regulators, state and local education agencies and other key stakeholders, amended FERPA regulations went into effect to address some of their longstanding ambiguities and barriers and to promote more effective use of data systems.[12] The amendments also attempted to provide more consistency across states and local agencies; before these amendments, some school districts had been sharing data with afterschool programs, but others interpreted this data-sharing as barred by FERPA (See California's Approach). These changes can provide clarity for school districts and better synchronize FERPA with the goals of other key education policies. (Previously, there were conflicts between perceived and actual limitations of FERPA interpretations, and policy goals of other federal mandates meant to advance and demonstrate specific student outcomes.[13]) The amendments, in addition to other issues, broadened the definition of an "authorized representative" and "education program" as well as further clarified that an educational authority (LEA or SEA) can enter into agreement for the purpose of research studies.[14] The expanded definitions are particularly significant for many OST providers.[15] Two common strategies identified by the OST field to systematically share data and meet the requirements of FERPA include:

1. Qualifying as an "authorized representative" of a contracted education program.

WHAT IS THE FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA)?[10]

FERPA is the primary federal law protecting the privacy and confidentiality of individual student-level information and records, known as Personally Identifiable Information (PII). PII includes information such as a student's address and social security number as well as grades, behavior referrals, or any unique data that could allow the student to be identified.[11] FERPA applies to all schools and districts that receive funding for programs administered by the U.S. Department of Education. FERPA requires written parental consent to disclose and share pupil data (any information from a student's record). Access and consent to pupil information switches from parent to student when the student turns 18. The law includes exceptions to the required written parental consent for when and to whom schools can disclose individual student data such as for research and evaluation purposes, audits, compliance with a court order, and school transfers.

FIGURE 2: NEW FERPA REGULATIONS: WHO CAN STATE AND LOCAL EDUCATION AGENCIES SHARE DATA WITH?

Source: The Forum for Youth Investment, First Look: New FERPA regulations (2011)

Who is Allowed to Share Data?

Can you share data with a department not controlled by the state education authority?		
	Old FERPA regulations	New FERPA regulations
Children aged 0-6	No	Yes
Children 7 years and older	No	Yes

Can you share data with an agency running early childhood education programs, postsecondary education programs, special education programs, job training, career and technical education programs, and adult education programs?		
	Old FERPA regulations	New FERPA regulations
Children aged 0-6	No	Yes
Children 7 and older	No	Yes

Can you share data with an agency running programs to improve social, emotional and physical development?		
	Old FERPA regulations	New FERPA regulations
Children aged 0-6	No	Yes
Children 7 and older	No	No

2. Conducting studies in partnership with schools.

FERPA allows education authorities to share data, with an "authorized representative", without prior parental consent, with an entity that has been authorized to conduct an audit, evaluation, or other compliance activity related to a federally or state-supported *education program* such as the 21st Century Community Learning Centers Program (see the THINK Together case study below).[16] The changes clarified that an "authorized representative" is not limited to schools and that education program contractors accessing student data are not required to work onsite.[17] An education program is now defined as any program that is "principally engaged in the provision of education" (including, *but not limited to*, early childhood education, elementary and secondary education, job training,

CALIFORNIA'S APPROACH TO CLARIFYING FERPA

In California, state and federal funding require OST programs to report on academic performance measures. Some districts were sharing data, but others were having difficulty, leading to inconsistent practices, and confusion across the state. In 2010, OST providers proposed and passed state legislation clarifying that sharing specific pupil data (school-day attendance, standardized test scores, high school exit exams, and English language development scores) between LEAs and contracted OST providers is permissible under FERPA.[i]

i AB 2178 (2010) was authored by Assembly Member Tom Torlakson. California Education Code. Chapter 462. Section 8484.1. http://www.leginfo.ca.gov/pub/09-10/bill/asm/ab_2151-2200/ab_2178_bill_20100929_chaptered.pdf

career and technical education) and "any program that is administered by an educational agency or institution."[18] Many OST providers could fall into this category as designees of federal and state education programs. It is important to note that these changes do not pertain to programs that do not have an explicit academic focus, which could exclude some OST programs.[19] (See figure 2.)

For the purposes of research, the exception for sharing student information requires that studies are "for or on behalf of" schools or LEAs for the purpose of predictive testing, the administration of student aid, or to improve instruction.[20] In some cases, OST providers have negotiated data-sharing within FERPA privacy protections by partnering with third-party entities, such as, vendors, universities and research institutions, which have existing agreements to conduct studies and evaluations in which individual students cannot be identified. In these cases, either third parties or school district staff may act as liaisons within the protected firewall to conduct data-sharing, matching and evaluation on students in OST programs, and in some cases across organizations and agencies.[21] (See Chicago Allies.) It is important to note that organizations can fall under more than one FERPA exception category.

For both the studies and audits exceptions, the updated FERPA regulations now *require* that there be a written agreement between state and local agencies and the partnering entities. Once schools and community partners have agreement on a vision for data-sharing, the more mundane step of developing the specific terms and protections begins. There are examples across the country of large providers and localities — Boston, New York, Baltimore, and San Francisco — that have negotiated differing agreements for data-sharing to be used to improve OST program quality and student success.[22] The terms are outlined in a Memorandum of Understanding (MOU) and are customized to the needs and legal concerns of each party. At a minimum, some of the key FERPA requirements in written agreements include:[ii]

- The purpose and scope of the study or audit.
- A designated "authorized representative."
- A description of the disclosed data and specific activities.
- How data will be protected.
- A requirement that data be destroyed upon completion of the study.
- A review of state and local privacy laws that require additional information.

As OST systems are growing more advanced and relying on multiple data points to demonstrate program impact, efficient and coordinated data-sharing systems are needed to better understand and respond to patterns and outcomes across groups of students as well as individual student data.

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ii This is not the full list of requirements. For additional information see the Family Policy Compliance office's Guidance for Reasonable Methods and Written Agreements, http://www2.ed.gov/policy/gen/guid/fpco/pdf/reasonablemtd_agreement.pdf.

- For aggregated data, system-level data-sharing should:
  - Include accurate and timely data using information systems that talk to one another.
  - Cut across organizations such as multiple school sites and agencies.
- In general, to use individual-level student information for case management, OST providers will continue to need written, parental consent to access student information. Besides being a legal requirement of FERPA, getting parental consent is also a good practice for engaging and informing parents of the program benefits and requirements. However, system-level efforts can simplify this process; in some localities, schools and LEAs may seek to get parental consent for large groups of students at one time during the school registration process.

HOW IT'S DONE: DATA-SHARING IN ACTION

There is substantive research and documentation on the benefits, challenges, and successes of effective data-sharing partnerships. The data-sharing process has been less clear. As demonstrated by the case studies below, even equipped with legal expertise, navigating FERPA and the agreement process is a time-consuming undertaking unique to each locality's need, will, and capacity. Both organizations featured below emphasized that developing a clear vision of how the data will be used to support student success, building trust, and being flexible to partners varying needs are foundational.

Examples in the field demonstrate that the implementation of these agreements can vary widely across agencies locally, between school districts and larger providers, and through research institutions or other nonprofits that coordinate and represent multiple communities and government stakeholders.[23] In larger cities and urban areas, there has been an increase in nonprofit

RESOURCES TO DEVELOP AND IMPROVE OST DATA-SHARING SYSTEMS

In June 2012, the Wallace Foundation released, *After School Data: Six Tip Sheets on What Cities Need to Know*, a series of short guides for OST practitioners and city officials that outline how to leverage and implement data-driven practices and systems. These resources highlight best practices and models for how to use data to advance advocacy efforts, improve program quality and accountability, and respond to local supply and demand.[25] They also walk through how some cities have navigated the legal barriers, the importance of vetting who can use data and how, and thinking through how partners can mutually benefit.

The National League of Cities released *Building Management Information Systems to Coordinate Citywide Afterschool Programs: A Toolkit For Cities*, a report for non-profits, cities, and regional level administrators on how to implement improved or new data management systems between schools, city agencies, and afterschool providers.[26] The brief is based on a survey of more than two dozen cities across the country and provides a number of examples of how cities, schools, and OST providers are collaboratively implementing best practice into action.

intermediaries that help OST providers, schools, and city agencies to develop and manage data systems models and processes.[24] Below are two illustrations of OST organizations that have successfully developed different types of data-sharing systems: THINK Together and Chicago Allies for Youth Success.

THINK Together (THINK) is one of the fastest-growing extended-learning-time (afterschool/summer) providers in California, serving more than 100,000 students at more than 400 schools and community centers throughout Los Angeles, Orange, Riverside, San Diego, San Bernardino, and Sacramento counties.[iii] Their rapid growth in geographically diverse school districts helped the organization realize early on their need for large-scale data-sharing to ensure data quality, improve program quality and demonstrate impact. THINK Together is funded by state, federal, and private grants and individual donors.

Initially, THINK focused on establishing data-sharing agreements in the larger school districts for several reasons, including the volume of participating youth and the reality that the larger districts have greater capacity such as sophisticated information technology systems. Getting administration buy-in, overcoming legal apprehension, and connecting information technology systems are vital time and resource issues that THINK identified. One of THINK's biggest selling points to districts is how they could save time and resources and provide more advanced program evaluations through data-sharing, but it still wasn't easy. In one case, it took three years for data-sharing to start after the initial meeting in which district leaders agreed to the partnership. THINK has developed an MOU template to streamline the process as they engage more districts, but, recognizing the need for flexibility, each agreement is tailored to the LEA and its students' needs and information technology capacity.

Over the past three years, THINK secured data-sharing agreements in 63 percent of the school districts they serve, with more on the way. Through these data-sharing partnerships and as outlined in their MOUs, THINK is able to access student data for conducting studies as an "authorized representative…. for, or on behalf of, educational agencies."[27] THINK adheres to FERPA guidelines by legally committing to keep all student information secure and conduct all analyses using de-identified student information. Through the development of their partnerships with LEAs, THINK has honed best practices such as being flexible and responsive to each LEA, developing administrative data management and evaluation capacity, and investing in secure information systems.

THINK partners with Cityspan Technologies, which oversees THINK's student tracking system to receive individual student data information from districts. The data THINK receives include daily data-dumps into THINK's protected system and more-detailed student academic and benchmark measures at scheduled points throughout the year. The individual student data include but are not limited to: student demographic

iii This summary is based on materials, correspondence and interviews with THINK Together staff. Kara Johnson. Interview by author. March 8, 2012.

information, school-day attendance, suspension history, course and teacher information, and state proficiency test scores.

Through data-sharing with LEAs, THINK has seen an improvement in data and program quality, and the process has freed up staff to spend more time directly with students. With access to achievement data, the organization can align programming with student academic needs, resulting in programs that are complementary to the traditional school day and better able to serve the academic needs of all students. Finally, and not unrelated to THINK's significant expansion across the state, data-sharing has allowed THINK to more-rigorously evaluate their program impact, make the case for their work and better support the needs of their school district partners.

More information on THINK Together's programs can be found at THINKtogether.org.

CHICAGO ALLIES FOR YOUTH SUCCESS
expanding quality learning opportunities

Chicago Allies for Youth Success was formed in 2011 as an intermediary to assist and coordinate agencies and organizations serving Chicago's youth.[iv] Chicago Allies grew from an initiative funded by the Wallace Foundation, led by the City of Chicago and After School Matters (ASM), and partnered with Chicago Public Schools (CPS), the Department of Family and Support Services, the Chicago Park District, the Chicago Public Libraries, and other stakeholders. This initiative formed the following foundational elements for Chicago Allies and its efforts behind more-systemic data-sharing:

- A committed critical mass of partners.
- Customized management information systems that were able to communicate on the back end and were integrated into the day-to-day work of the partner organizations.
- A common program quality improvement framework that enabled the partners to use data to drive continuous program improvement.

To be a member of the Chicago Allies partnership, a stakeholder must serve youth outside of the school day, demonstrate a commitment to collaborative goals and data-sharing, provide a financial contribution to sustain the partnership, and have sufficient technological and staff capacity.

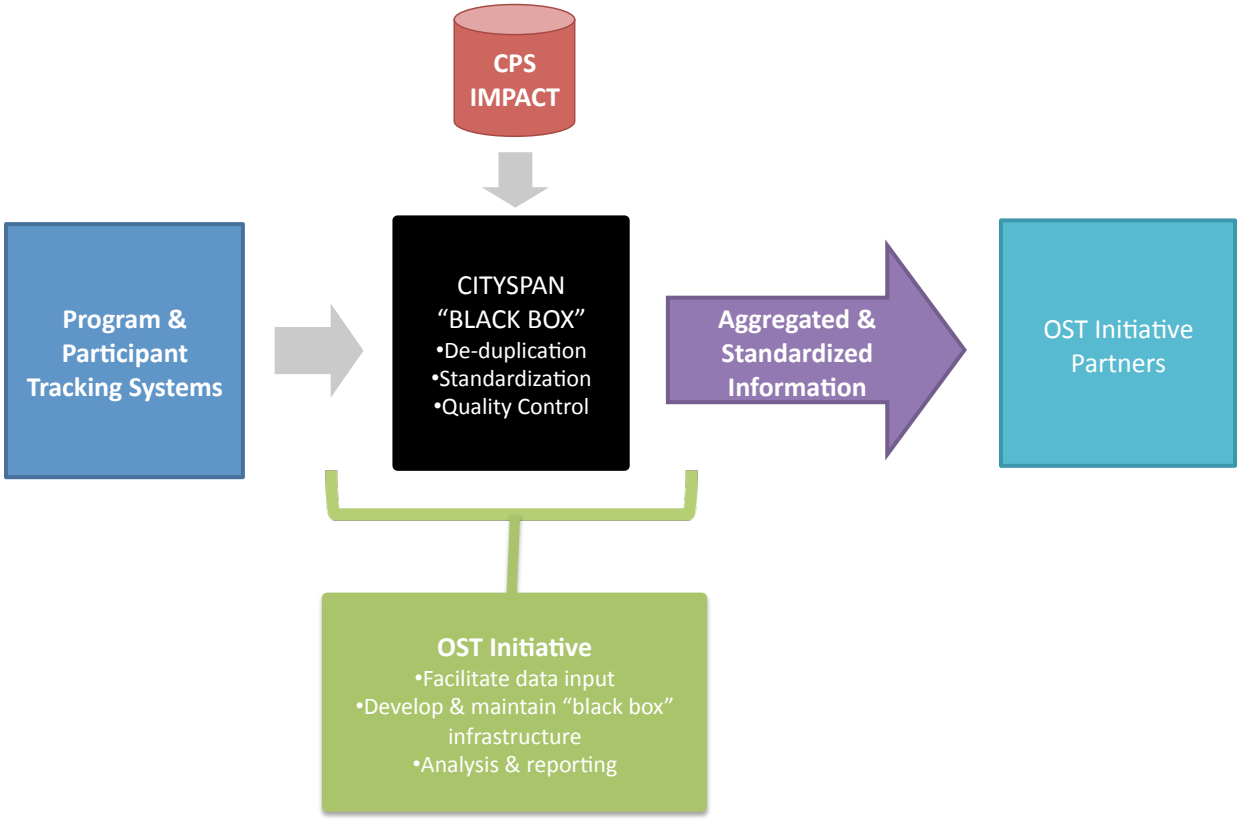
For the past three years, Chicago Allies has led the ongoing and collaborative process to develop data-sharing agreements (MOUs) across partners and provide the analyses and reports across silos to build a common framework for outcomes and metrics. More recently, the Mayor's Office and CPS set new priorities and goals to open up capabilities, resources, and systems for sharing data across agencies and organizations to positively impact youth outcomes. These changes were made possible by the existing infrastructure developed by Chicago Allies and their partners.

Chicago Allies' new focus is on data

iv The summary is based on materials and correspondence with Chicago Allies for Youth Success. Jim Chesire and Andrew Rice. Interview by author. June 2012

FIGURE 3: WALLACE FOUNDATION-FUNDED DATA-SHARING INFRASTRUCTURE

Source: Chicago Allies for Youth Success.[vi]



organization, bringing the right stakeholders together, facilitating standardization of measures and outcomes, and providing technical assistance on data-sharing efforts. Three key data-related efforts that are under way include: (1) developing an Orbitz-like, unified afterschool enrollment portal in Chicago; (2) developing mechanisms to open up case-management-level data-sharing across City and County human services agencies; and (3) defining common youth outcome standards across public and private afterschool funders and providers in partnership with the school district.

Chicago Allies' partners work directly with Cityspan Technologies, the vendor that holds all of the individual student data, to customize reports and data queries, and Chicago Allies helps facilitate requests for other partners' data as needed.[v] To ensure the security of the data and protect the identification of individual students in compliance with FERPA, Cityspan houses the student data, and analyses and reports cannot include fewer than ten students. In this way, Chicago Allies' partners operate within the FERPA "firewall" or "black-box" (See figure 3.) This data-sharing has granted OST partners access to usable data such as an analysis of sum-

v Previously, Chicago Allies worked directly with CitySpan to customize reports but now their focus is on facilitating requests across partners.

vi This diagram displays the flow of information under the Wallace funded initiative, the current data-sharing partnerships and flow of information are undergoing transformation.

mer programming across the schools, park, library and community organizations for CPS; and an analysis for ASM on the academic outcomes for their participants within a month of an initial request. This information has supported continuous program improvement efforts to support student success.

Chicago Allies highlights strategies for effective data-sharing such as how systems can approach youth and families holistically, develop targeted and responsive youth services that are aligned with the school district, and operationalize partnerships. This approach has enabled an emerging cradle-to-career infrastructure in Chicago that, similar to other national efforts, will seek to align services from early childhood through workforce development.

More information about Chicago Allies for Youth Success can be found at Chicago Allies for Youth Success.

CONCLUSION

More than ever school districts are required to do more with less and therefore are relying on community partners to help support meeting the needs of the "whole" child. Collectively, our schools and many educational programs have a long list of barriers to improvement — but systematic data-sharing in the best interest of students should not be one of them. Given that expanded learning strategies will likely continue to be a central part of the education reform movement, it is crucial to the success of these efforts that both LEAs and the OST field increase the practice of sharing data.

ABOUT THE PARTNERSHIP FOR CHILDREN AND YOUTH

Partnership for Children and Youth (PCY) is a California-based non-profit that connects community partners and schools to resources through on-the-ground technical assistance, state and national policy development, and advocacy. Our mission is to ensure that school-age children and youth living in low-income communities have the support and the opportunities they need and deserve to thrive in school and in life. PCY helps schools and community partners build resources and capacity to provide expanded learning opportunities after school and in the summer, access to health and mental health care, nutritious meals and more — so that every child has the best possible chance to succeed.

This document was published in November 2012. For more information on this publication please contact info@partnerforchildren.org *or visit* www.partnerforchildren.org.

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