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Dear New York State 21st Century Community Learning Centers (21st CCLC) subgrantees, school leaders and partners:

To meet the Government Performance and Results Act (GPRA) requirements for the 21st CCLC program (Title IV Part B), NYSED requires that all participating school districts, whether the lead agency or the partner(s) of a lead agency, provide access to certain student-level data, also referred to as personally identifiable information or PII, for the federally required annual performance reports (APRs). As discussed further in this letter, PII data are also needed for state and federal requirements for subgrantees to assess their local goals and objectives, and for NYSED to assess state-level goals and objectives, which are broader than the APR indicators.

A summary of these data sharing requirements from district partners is shown in the table below.

Summary of Data Sharing Requirements from District Partners

Purpose	Required Data Sharing (PII is required except as noted)
Federal GPRA Reporting	<ul style="list-style-type: none"> • Student NYSSIS IDs • Report card grades (grade levels 7-12) • Support administration of teacher surveys (grade levels 1-5)
Assessing State Objectives	[No requirements from districts specific to 21 st CCLC; State Evaluator obtains student PII from NYSED/SIRS]
Assessing Local Program Objectives	<p>All student data specified by subgrantee, or their evaluator as needed to assess objectives.*</p> <p>Must be provided as PII <i>unless</i> the district is able to aggregate the data in the form necessitated by the local program evaluation plan.</p>

*This includes much of the same additional data provided by SIRS to the State Evaluator and the Statewide Data System vendor for GPRA reporting and State Objectives, but NYS Education Law 2-d prohibits re-sharing that data with sub-grantees or local evaluators.

Data Required for Federal GPRA Reporting (APRs)

The APR collects the data for annual reporting to Congress as per Title IV Part B statute through the federal 21APR system. NYSED will provide all required APR data that resides in its Student Information Repository System (SIRS). However, there are just a couple of additional data elements that districts are required to provide that NYSED does not have, in order to meet the federal requirements for APRs.

This requirement was made explicit in the RFP for this grant and required all applicants, whether community-based organizations or school districts, to have a partnership agreement in place stipulating that the school district must provide access to required data to meet federal requirements. For APR requirements, school districts are required to provide the following data elements:

1. Student NYSSIS ID #s
2. Participating students' (currently in grades 7-12 only) report card grades in ELA, mathematics, social studies and science from the previous and current years

All subgrantees are also required to submit teacher surveys of their perceptions of participants' classroom engagement. Districts are required to participate with teacher survey facilitation efforts, but teachers' participation, while strongly encouraged, cannot be required.

NYSSIS IDs for all 21st CCLC participants are required so that NYSED can access and upload the required student records in SIRS for 21st CCLC subgrant participants. For subgrantees outside of NYC ("rest of state" region), these IDs are to be entered directly by the subgrantee into the statewide data system (EZReports). In NYC, NYSSIS IDs are collected by the NYC Resource Center through the NYCDOE's Research and Policy Support Group (RPSG) and entered directly into EZReports. Therefore, NYC subgrantees are required to collect and enter student OSIS IDs into EZReports, so that RPSG can locate and provide the NYSSIS IDs. EZReports is owned and operated by Thomas Kelly Software Associates (TKSA), with whom NYSED has a data privacy agreement (attached).

Report card Grades. Districts are also required to provide previous year and current year report card grades for participating students in grades 7-12. Measurement Incorporated (MI), a contractor for NYSED to support the statewide evaluation of the 21st CCLC subgrant, and with whom NYSED also has a data privacy agreement (see attached), will have access to that data so that the data can be converted into GPAs as required by GPRA. Unweighted GPAs are required to assess the GPRA measure of GPAs improvement from the previous to the current year. Because the program needs to use a consistent approach to developing GPAs, even schools that include GPAs in their grade reports will be asked to provide report card grades. MI provides subgrantees with a calculator which converts the grades data from a variety of district grading systems across the state into GPAs in a systematic way that ensures uniformity and accuracy in the calculation. This PII data is returned to NYSED using a secure File Transfer Protocol (FTP) site, and then transferred to EZReports using a secure data upload. Once the data is in EZReports, it is converted into the aggregated data needed for the APR and is automatically uploaded into the 21APR system.

Teacher Surveys. One other GPRA data requirement which originates with the district is the teacher surveys (grades 1-5 only), which measure the percentage of participants whose school

teachers report an improvement in student engagement from the beginning of the year to the end of the year. In the spring, NYSED provides a survey through EZReports, which is distributed to teachers of participants via the 21st CCLC subgrant staff. While subgrantees are required to report the data they are able to obtain, teachers (who are the source of the data) are encouraged but not required to respond to the survey. Survey responses from the teachers go directly into EZReports and individual responses are then aggregated for APR reporting.

With the data available through SIRS, NYSED will be providing required GPRA data on State assessments, school attendance, in-school suspensions, and demographics.

Data Required by Federal Statute for Analyses of State Objectives

MI will also have access to PII provided by SIRS and the participating school districts. MI will need to share some of the PII with a sub-contractor for the purpose of federally required analyses (State objectives), and that sub-contractor will be required to provide all of the same privacy and security agreements as required by NYSED. Subgrantee staff accessing EZReports will not be able to see any of the data coming from SIRS as per Education Law 2-d, which stipulates that PII cannot be shared with a third party.

Data Required for Assessing Local Subgrant Objectives

All districts should have a data sharing agreement with the subgrantee or evaluator regarding provision of student data for the local evaluation. Districts are required to share either aggregate or PII student data, depending on the subgrant evaluation plan. Please note that data that the subgrantee needs to assess its own objectives, performance indicators, and/or for other programming purposes can be provided by the district to the subgrantee as aggregate data, but only if the district is able to aggregate the data in the form that the subgrantee specifies. If PII is required, districts are legally allowed to provide PII data as they are considered the party with whom the data originated. Sharing data with the evaluator to meet the goals and objectives of the subgrant is required because the subgrant proposals are written in response to the State RFP, which stipulates federal requirements for local evaluation, as well as state and federal evaluation of this program.

Please see the attached data privacy agreements between TKSA and NYSED and between MI and NYSED, which can be shared with participating districts as evidence of the 21st CCLC data security measures, along with this email. If districts have additional questions or concerns, please reach out to your Resource Center as soon as possible. The above data sharing is federally required, and our State Evaluator has emphasized the importance of compliance. Note that lack of compliance could jeopardize subgrant funding.

Sincerely,



Elizabeth Whipple, SEA Coordinator
21st Century Community Learning Centers grant