

**Public Comments Received During the 60-day Comment Period –  
December 2016**

**State Longitudinal Data System (SLDS) Survey 2017 – 2019**

ED-2016-ICCD-0107

Comments on FR Doc # 2016-24298

**Comment Number 5**

**Document:** ED-2016-ICCD-0107-0005

**Name:** Joshua Jones

In 2016, education as a whole should be making data-driven decisions. The SLDS survey will continue to provide helpful information and will enhance the program's reach and overall impact.

**Response**

Dear Mr. Jones,

Thank you for your feedback posted on October 17, 2016 responding to a 60-day request for comments on the proposed Statewide Longitudinal Data System (SLDS) Survey 2017. The National Center for Education Statistics appreciates your interest in the SLDS Program.

Sincerely Yours,

Nancy S. Sharkey  
Statistician, National Center for Education Statistics  
United States Department of Education  
Institute of Education Sciences  
550 12th Street, SW, Room 4162  
Washington, DC 20202

**Comments 7 and 8**

**Comment Number 7**

**Document:** ED-2016-ICCD-0107-0007

**Name:** Catherine Imperatore (*on behalf of LeAnn Wilson and Kimberly Green*)

Thank you for this opportunity to provide comments in response to the State Longitudinal Data System (SLDS) Survey 2017-2019 (Docket No. ED-2016-ICCD-0107). The Association for Career and Technical Education (ACTE) and Advance CTE appreciate NCESS's commitment to collecting information on state longitudinal data systems (SLDS), which perform a vital function in many states by linking data across education and workforce systems. While this survey has great potential to facilitate understanding of SLDS capabilities, we recommend the attached edits pertaining to the CTE section of the survey.



December 6, 2016

Peggy G. Carr  
Acting Commissioner, National Center for Education Statistics  
United States Department of Education  
Institute of Education Sciences  
555 New Jersey Ave, NW  
Washington, DC 20208

Re: State Longitudinal Data System Survey 2017-2019, Docket No. ED-2016-ICCD-0107

Dear Dr. Carr:

Thank you for this opportunity to provide comments in response to the State Longitudinal Data System (SLDS) Survey 2017-2019 (Docket No. ED-2016-ICCD-0107).

The Association for Career and Technical Education is the nation's largest not-for-profit association committed to the advancement of education that prepares youth and adults for successful careers. ACTE represents the community of CTE professionals, including educators, administrators, researchers, guidance counselors and others at all levels of education. Advance CTE represents the state and territorial leaders of our nation's CTE system and both organizations are committed to excellence in providing advocacy, public awareness and access to resources, professional development and leadership opportunities.

We appreciate NCES's commitment to collecting information on state longitudinal data systems (SLDS), which perform a vital function in many states by linking data across education and workforce systems. SLDS survey results will help NCES provide funding and technical assistance to states and territories to improve SLDS data collection and usage, and if made publically available, would encourage peer-to-peer collaboration and innovation.

While this survey has great potential to facilitate understanding of SLDS capabilities, some of the questions pertaining to CTE do not reflect the language used in the field or

the type of information included in Perkins CTE data systems. ACTE and Advance CTE recommend the following edits to the questions pertaining to Perkins CTE:

- Use the term “Perkins CTE” throughout. This clarifies that the question pertains to state data systems supporting the requirements of the Carl D. Perkins Career and Technical Education Act. An important function of state data systems for CTE is to collect and report on CTE participant and concentrator enrollment as defined by U.S. Department of Education non-regulatory guidance, student performance on Perkins accountability indicators and data on Perkins-defined subpopulations.
- Write questions with the understanding that Perkins CTE data captures elements of a student’s experience, but that a student is also enrolled in a K-12 or postsecondary institution with a student K-12 or postsecondary record. For instance, considering adding the question “Is Perkins CTE data linked with the rest of a student’s K-12 and/or postsecondary record?”
- Question 4(g)(vi): Remove this item. Perkins CTE data is reported through *EDFacts*.
- Question 16(m): Add “CTE/Perkins (non-*EDFacts*)” as an item under “Federal reports.” Perkins CTE operates on both the secondary and postsecondary levels, and on the postsecondary level is not reported through *EDFacts*.
- Question 23: Change this question to ask where secondary Perkins CTE student data is housed, and add a question asking where postsecondary Perkins CTE student data is housed. Many states store secondary and postsecondary Perkins CTE data in different locations
- Questions 24-26: Each of these questions refers to linking Perkins CTE data to K-12 data. Repeat each question, asking about linking Perkins CTE data to postsecondary data. Perkins CTE operates on both the secondary and postsecondary levels.
- Question 26(a): Change item (a) to “Program area/program of study” to clarify that this item refers to the field of study that the CTE student is pursuing; for instance, a field of study such as health care or manufacturing, or one of the 16 Career Clusters, an organizing schema used for the purposes of Perkins reporting in all states.
- Question 26(b-d): Replace items (b-d) with questions about CTE participant and concentrator enrollment and student performance on Perkins accountability indicators.
- Question 28(f)(i): Edit to reflect that on the secondary level, Perkins CTE data is reported through *EDFacts*, while on the postsecondary level, it is not reported through *EDFacts*.
- Definitions — “Career/Technical Education (CTE)” and “Perkins”: The Definitions section defines “Perkins” as the federal loan program only, although the term “Perkins” is used in 4(g)(vi) to refer to CTE. In addition, the definition of “Career/Technical Education (CTE)” does not accurately capture CTE. Delete the definition of “Career/Technical Education (CTE)” and add a definition of



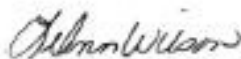
“Perkins CTE” that refers to the Carl D. Perkins CTE Act. For help formulating an appropriate definition, ACTE suggests contacting Lisa Hudson from the NCES CTE Statistics Survey Area and Corinne Alfeld of the National Center for Education Research.

In addition to our suggestions pertaining to Perkins CTE, we recommend that the survey:

- Add questions about collecting and linking college and career readiness data. Many states are incorporating college and career readiness indicators into their state accountability systems. These can include the attainment of postsecondary credit, which this survey captures in 2(p) and 2(q), but also participation in work-based learning experiences, attainment of industry certifications and licenses, and performance on workplace readiness assessments.
- Clarify the types of credentials on which data is collected throughout. Consider using the term “diploma/certificate” to refer to high school/GED completion, and the term “recognized postsecondary credential” to refer to other types of credentials. This term is defined in the Workforce Innovation and Opportunity Act as a “credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.” Efforts are underway to promote the use of this definition across federal education and workforce development legislation for more aligned policy and data systems.

We recommend that future drafts of the survey be shared with CTE experts, such as Drs. Hudson and Alfeld, to ensure that Perkins CTE data systems are accurately represented. We appreciate the opportunity to comment. If you have any questions or need additional information, please contact Catherine Imperatore, ACTE’s Research Manager, at [cimperatore@acteonline.org](mailto:cimperatore@acteonline.org) or Steve Voytek, Advance CTE’s Government Relations Manager at [svoytek@careertech.org](mailto:svoytek@careertech.org).

Sincerely,



LeAnn Wilson  
Executive Director  
ACTE



Kimberly Green  
Executive Director  
Advance CTE

## Comment Number 8

**Document:** ED-2016-ICCD-0107-0008

**Name:** Jenna Leventoff (on behalf of Rachel Zinn)



**To:** National Center for Education Statistics (NCES)  
**From:** Workforce Data Quality Campaign  
**Re:** State Longitudinal Data System Survey 2017-2019, Docket No. ED-2016-ICCD-0107  
**Date:** December 6, 2016

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Workforce Data Quality Campaign (WDQC), a project of National Skills Coalition, is a non-profit initiative that promotes inclusive, aligned, and market-relevant education and workforce data. Guided by a diverse group of national partners and state officials representing stakeholders across the education and workforce spectrum, WDQC encourages the use of data to ensure that our nation's education and training programs are preparing students and workers to succeed in a changing economy.

The following are WDQC's comments in response to the State Longitudinal Data System (SLDS) Survey 2017-2019 (Docket No. ED-2016-ICCD-0107). We appreciate the opportunity to offer recommendations to the National Center for Education Statistics (NCES) on this issue.

WDQC applauds NCES for its thoughtful approach to gathering information on the capacity of *all* state and U.S. territory longitudinal data systems to link data across the education and workforce spectrum. Since our inception, WDQC has advocated for P-20W data systems that can provide students, workers, policymakers, business leaders, and educators with the information they need to make informed decisions.

The information gathered from this survey will enable NCES to hold grantees accountable, and provide funding and technical assistance to the states and territories best suited to make good use of it. Once shared, this information will also enable peer learning, ultimately paving the way for more states to create better longitudinal data systems with fewer resources. Finally, this information will help organizations, like WDQC, to encourage better data infrastructure and use in the states.

Since 2014, WDQC has conducted an annual survey of state progress against our [13-point Blueprint](#) for strong state data systems. This year's final report, "[2016 Mastering the Blueprint: State Progress on Workforce Data](#)," includes results from all 50 states plus the District of Columbia. WDQC has used this survey to convince policymakers and other stakeholders of the need for better data infrastructure and use. However, with a few additional questions and clarifications, the SLDS Survey could add to the existing body of knowledge about state data infrastructure and use.

#### **Expand Survey to Capture Other Types of Data**

To improve this survey, WDQC believes NCES should include additional questions that truly capture the breadth of data linkages in the states. Many students utilize social services and public benefits, such as Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) and Temporary Assistance for Needy Families (TANF), in order to help them complete their studies and find economic success. In order to assess the role these programs play in student success and reducing reliance on public benefits, states must link this data to other education, training, and

employment data. Accordingly, NCES should add questions to ask which social service data is included in SLDS and linked to other data in the P-20W spectrum.

Moreover, many students participate in work-based learning programs, and a growing number of states are making efforts to add that data into their SLDS. NCES should acknowledge that effort by posing questions about the inclusion of work-based learning data in SLDS, and asking about states' ability to link work-based learning data with other data in the P-20W spectrum. In addition, NCES should consider incorporating questions about other measures of career readiness that states are adding to their data systems, such as attainment of industry certifications and licenses, as well as performance on workplace readiness assessments.

### **Expand Survey to Discuss Breadth of P-20W Data Linkages**

WDQC also believes this survey should be expanded to acknowledge the true extent of student movement among education and training programs, simultaneously or sequentially. For example, a jobseeker may enter the workforce in a minimum-wage job, and then continue on to a certificate program at a community college as a part-time student while working. After finding a new, higher-wage job and working for a few years while raising a family, that student may decide to return to community college to earn an Associate's degree. In order to gauge state ability to understand career pathways, this survey should add additional questions evaluating linkages between Career and Technical Education (CTE) and Adult Education and other types of data in the P-20W spectrum. For example, the survey could ask about CTE linkages with Adult education or postsecondary data.

### **Promote Interagency Collaboration and Aligned Metrics**

States offer a mix of workforce and education programs, often administered by different agencies, to prepare students and workers to participate in the U.S. economy. In order to know whether these programs are working together effectively, WDQC believes that SLDS require strong cross-agency collaboration, as well as aligned metrics. This survey offers a unique opportunity to promote these elements of a strong SLDS. Asking states whether they have a cross-agency council (that includes representatives from early childhood, K-12, higher education, CTE, labor, and social services) to oversee its SLDS will encourage states to think about the benefits of cross-agency collaboration, paving the way for better communication among relevant agencies and therefore more successful data linkages. Furthermore, consistent metrics across education and workforce programs included in SLDS streamline data collection and enable states to produce comparable information that gives policymakers a holistic view of human capital development in their state. Accordingly, WDQC recommends that NCES include additional questions to ask states whether they have aligned definitions and metrics across the P-20W spectrum.

### **Determine State Barriers to Success**

In order to gauge why some states and territories are still struggling to build inclusive, aligned, and market relevant data systems, NCES should ask states which barriers prevent them from linking or using data. WDQC has often heard from states that they struggle because of legislation, restrictive legal opinions, difficulty coordinating between state agencies, a lack of resources, or data quality concerns. Understanding state barriers will enable NCES and others to provide more targeted

assistance that will ultimately improve this nation's data infrastructure and use of data for actionable intelligence.

## Clarifications

Finally, WDQC recommends a handful of clarifications, in order to ensure that states are able to provide accurate responses to the survey. Specifically, NCES should:

- Specify whether the questions discussing CTE pertain to secondary and/or postsecondary CTE, and whether it refers to programs funded under the Carl D. Perkins Career and Technical Education Act (Perkins CTE), or to occupational training more generally. If these questions are intended to reflect Perkins CTE, we suggest rewriting the questions in the CTE section to ensure that they reflect the information captured in Perkins CTE data systems, including CTE participant and concentrator enrollment as defined by U.S. Department of Education non-regulatory guidance, student performance on Perkins accountability indicators, and data on Perkins-defined subpopulations. In addition, we suggest revising questions to reflect the fact that students whose data are included in Perkins CTE data systems also have K-12 or postsecondary student records. Finally, NCES should ensure that questions are formatted to reflect that secondary Perkins CTE data, postsecondary Perkins CTE data, other CTE data, and Adult Education data may be housed in different locations. We refer you to the comments submitted by the Association for Career and Technical Education, a WDQC partner organization, which address these issues more fully.
- Move questions 18(b)(viii-x) (referencing WIASRD, Wagner-Peyser, Trade Adjustment Assistance). These three sources of data relate to persons served by workforce training programs, and are not included in employment records.
- Indicate that student data can also include data on students in workforce training programs, such as those offered by community-based organizations and supported through Workforce Innovation and Opportunity Act funding.
- Add the Wage Record Interchange System (WRIS) and WRIS 2 as examples of cross-state data sharing in question 37(f).
- Delete the word "average" in question 19(b)(ii), as many states collect other and/or additional measures of wage information.
- Add consumer scorecards as an example of resources for the public, parents, and students in questions 19(d), 28(d), and any other questions referring to information created for the public. States sometimes refer to online resources for students and/or parents as scorecards.
- Add a definition of "college-going employment outcomes" and "transfer employment outcomes."
- Clarify the types of credentials on which data is collected throughout. Consider using the term "diploma/certificate" to refer to high school completion, and the term "recognized postsecondary credential" to refer to other types of credentials. This term is defined in the Workforce Innovation and Opportunity Act as a "credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or



baccalaureate degree." WDQC and other organizations support the use of this term throughout aligned federal education and workforce policy.

### Conclusion

WDQC thanks NCES for the opportunity to comment, and for their ongoing work to improve SLDS. Should you have any questions, or want additional information please contact:

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202-223-8355

Workforce Data Quality Campaign – a project of National Skills Coalition  
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[www.workforcedqc.org](http://www.workforcedqc.org)

### Response

Dear Ms. Wilson, Ms. Green, and Ms. Zinn,

Thank you for your feedback posted on December 7, 2016 responding to a 60-day request for comments on the proposed Statewide Longitudinal Data System (SLDS) Survey 2017. The National Center for Education Statistics (NCES) appreciates your interest in the SLDS Program, and your commitment to the SLDS initiative.

We have incorporated many of your thoughtful suggestions into the SLDS Survey:

- All references have been changed to “Perkins CTE” as opposed to “CTE”. We have included the following definition to clarify reference to state data systems supporting the requirements of the Carl D. Perkins Career and Technical Education Act. Additionally, the following definition was added to the “Definitions” section:

*“The Carl D. Perkins Career and Technical Education Act of 2006 (Perkins) provides federal support for CTE programs in all 50 states, the District of Columbia, and the territories. The law focuses on the academic and technical achievement of CTE students, strengthening the connections between secondary and postsecondary education, and improving accountability.”*

- Question 4(g) has been removed from the survey; Perkins CTE data is reported through ED*Facts*.
- Perkins CTE (non-ED*Facts*) was added as a sub-question to Question 16(m) to distinguish from “Other federal reports”, similar to IPEDS.
- Question 26(a) was changed to “Program area/program of study” to clarify that this item refers to the field of study that the CTE student is pursuing.
- WRIS and WRIS 2 were added as examples of cross-state data sharing in Question 37(f).
- The word “Average” was removed in Question 19(b)(ii) to be inclusive of all state wage measures.
- “Consumer scorecards” was added as an example to all questions relating to resources for the public, parents and students.
- Questions 22a.i. through 22.a.iv have been amended to be clearer.



- There were two instances where credential language was edited to state “diploma/certificate” and “recognized postsecondary credential”. The definition provided was also added to the “Definitions” section of the Survey.
- Questions 18.b.viii. through 18b.x. were not moved because the root question refers to workforce data or other employment data, and not to data specifically in employment systems.

Because the scope of this survey focuses on K12 education outcomes, Questions pertaining to Perkins CTE will remain only slightly modified under the presumption that references are intended to result in the data collection of linkages to K12 (secondary) Perkins CTE student data, as opposed to data from other sectors. The U.S. Department of Education strives to remain cognizant of the fact that its purview and efforts focus on education, despite the exploratory efforts to better gauge how education is linked to other sectors. While more information is always useful to the variety of stakeholders that the SLDS initiative impacts, we want to guarantee that we are capturing education data in its own right and as linked to other federal programmatic initiatives. Striking the needed balance poses challenges, so we welcome ongoing feedback on the content and structure of the survey. At a later time, we might consider broadening the scope of the survey and/or revisiting the survey questions to begin collecting information more inclusive of data from other sectors.

Additionally, as part of its development, the SLDS Survey was piloted with and vetted by a sample of states that provided feedback and suggestions for improvement. This process resulted in many changes to the Survey to ensure that our key stakeholders were able to understand and respond to survey questions appropriately. The pilot states provided favorable feedback when comparing the SLDS Survey to past similar surveys in the field.

A significant amount of time was also spent balancing the Survey’s length and comprehensiveness. This resulted in shortening the Survey in breadth to remain committed to a K12 student outcome survey emphasis. The survey has been expanded to include many other sources of data, and we remain confident that this is a valuable starting point to a data collection of this nature.

Your thought-provoking and informative feedback will definitely be considered if we decide to expand the Survey’s scope in the future.

Sincerely Yours,

Nancy S. Sharkey

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