

# Temporary Assistance for Needy Families (TANF)

## - Information Session -

### Education Outcomes Reporting: Obtaining Education Data Through Administrative Records





# Introductions

# Today's Objectives



1. Review steps to obtain administrative education data from state education agencies or state longitudinal data systems (SLDS)
2. Hear from other states about their experiences
3. Hear from states what additional supports are needed to meet the FRA requirements

# Agenda



- 1. Advantages of using administrative records**
- 2. Possible sources of education records**
- 3. Step-by-step process for obtaining records**
  - Experiences of other state agencies
- 4. FERPA and data privacy requirements**
- 5. Key takeaways**



# Advantages of using administrative records instead of surveys



- ✓ **Higher accuracy** – reduces recall errors and self-report bias
- ✓ **Broader coverage** – typically includes all individuals in the system, not just survey respondents (although there may be possible gaps – e.g., private schools)
- ✓ **Longitudinal tracking** – captures student progress over time without repeated surveys
- ✓ **Timeliness** – once data exchange is set up, data may be updated more frequently than survey cycles and it can reduce burden for staff and participants
- ✓ **Lower cost** – could be more affordable since it avoids expensive data collection and follow-up with participants

# Sources of Education Records



<b>State Education Agency (SEA)</b>	Maintains K–12 student-level data
<b>State Longitudinal Data System (SLDS)</b>	Links K–12, postsecondary, and workforce data
<b>Local Education Agencies (LEAs)</b>	District-level data (less common/useful for statewide analysis)

# Questions?





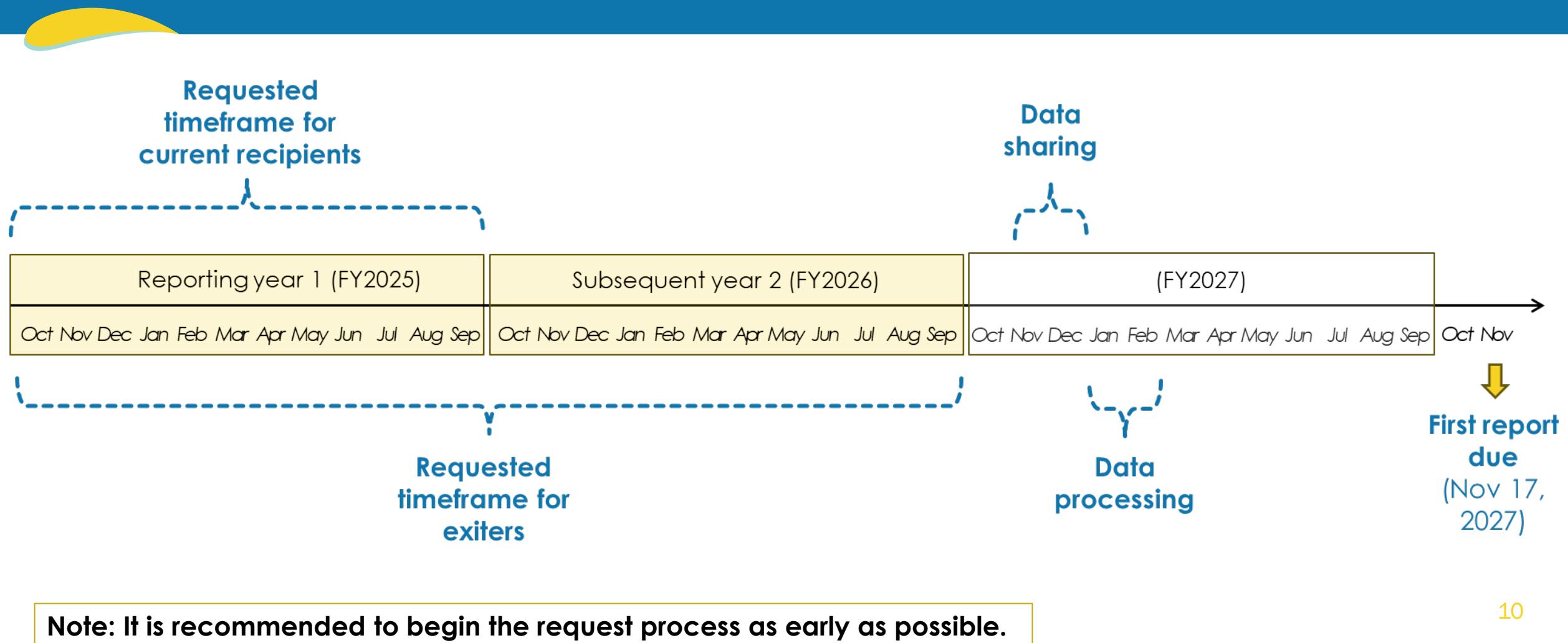
# Step-By-Step Process for Obtaining Administrative Education Records

# Step 1: Define Your Data Needs



- Decide which pieces of information you need (e.g., secondary education enrollment AND attainment dates)
- Identify **individuals** who meet **all** of the denominator criteria. In at least one reporting month, they were:
  - Less than 24 years of age
  - Work-eligible individual (WEI)
  - Enrolled in secondary education (or if enrollment is unknown, has not yet completed secondary education)
- Determine how many **current recipients** and **exiters** you may have
  - A work-eligible individual will be included as an exiter only when their family ceases to receive assistance during the reporting period.
- Determine **time frame** for data coverage and request

# Example of Request Timeframe



# Step 2: Determine Data Ownership & Access Rules



- Locate data provider (SEA research/data office or SLDS administrator)
- Identify relevant state data governance policies
- Confirm FERPA requirements and allowable uses

# Complying with FERPA



**Family Educational Rights and Privacy Act** (FERPA) is a federal law that protects the confidentiality of student education records. It applies to all education records maintained by schools or agencies receiving U.S. Department of Education funding.

## **Key points for TANF agencies to consider:**

- Education records can only be shared with written consent OR under specific FERPA exceptions (e.g., research/evaluation, audit, directory information)
- Must have a data sharing agreement specifying the purpose, data use, and protections
- Limit use to approved purposes; no redisclosure without consent

# Alternatives for collecting school records without consent



## De-identified Data:

- When feasible, use de-identified data to avoid FERPA implications.
- TANF agencies may request that educational agencies match their TANF records to school records and return data at the individual level, excluding any personally identifiable information (PII).

# Alternatives for collecting school records without consent (continued)



## Aggregate Data:

- Aggregating student data into reports reduces disclosure risk by removing direct identifiers
- However, disclosure risks remain when students have unique characteristics or when observable traits correlate with reported data (e.g., all males in a grade scoring below proficient)
- In such cases, state and local agencies may take additional disclosure avoidance measures to protect educational records (PII) in aggregate reports

**For additional information,  
see the FERPA handout on  
the PeerTA site:**

**[https://peerta.acf.hhs.gov/  
total](https://peerta.acf.hhs.gov/total)**



#### **TANF Outcomes Technical Assistance and Logistics (TOTAL) Project FACT SHEET**

As part of the Fiscal Responsibility Act (FRA) of 2023, all states are required to submit the **Secondary School Diploma or its Recognized Equivalent Attainment Rate** report annually, with the first report due on November 14, 2027. This outcome measure is intended to assist federal and state policymakers to better understand the effectiveness of TANF programs in promoting successful education credential attainment. States have some flexibility in determining the data sources used to create this report. However, when collecting or sharing school records, **education organizations must adhere to the Family Educational Rights and Privacy Act (FERPA) requirements and any additional state privacy laws**. This document provides an overview of FERPA, describes different options for collecting school records, and includes additional resources.

##### **What is FERPA?**

The Family Educational Rights and Privacy Act (FERPA) of 1974 is a federal law that protects the confidentiality of student education records. FERPA applies to any educational institution that receives funding from the U.S. Department of Education.

##### **What is PII?**

Personally Identifiable Information (PII) includes not just obvious details like a student's name or Social Security number but also indirect clues to someone's identity, such as their birthdate or mother's maiden name. It also covers any information that, when combined with other information, could reasonably identify a student. Even if a record has no direct or indirect identifiers, the student's identity might still be discernible to those in their community familiar with details about that student. (See 34 CFR § 99.3 for PII definition). To ensure FERPA compliance, the following seven elements of PII must be removed:

1. student's name;
2. the name of the student's parent or other family members;
3. the address of the student or student's family;
4. a personal ID, such as the student's Social Security Number (SSN), student number, or biometric records;
5. other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name;

# Step 3: Build Partnerships Early with Education Agencies



- Engage with SEA or SLDS staff before submitting a request
- Work with them to clarify reporting requirements by preparing a formal request that includes:
  - Data elements
  - Time period
  - Timeline
- Identify a data liaison within TANF agency and education agency to coordinate communications

# Data Collection Guide:

<https://peerta.acf.hhs.gov/total>



## Secondary School Diploma Attainment Rate: Working with State Education Agencies or Longitudinal Data System Organizations

As part of the Fiscal Responsibility Act of 2023, all states are required to submit the *Secondary School Diploma or its Recognized Equivalent Attainment Rate* report annually, with the first report due on November 14, 2027. This outcome measure is intended to assist federal and state policymakers to better understand the effectiveness of TANF programs in promoting successful education credential attainment. The outcome is defined as the percentage of applicable TANF recipients and exiters who, during the reporting period, attained a secondary school diploma or a recognized equivalent credential.

TANF agencies may opt to collect the data necessary for this report from their state education agency or longitudinal data system. This document contains a series of **questions to begin a conversation with these data providers** about the possible use of their data.

Appendix A outlines how the rate is calculated, including eligibility criteria to determine who should be included in this reporting, and Appendix B shows the information that states are required to submit.

### General Questions

- Please provide the name and contact information for a person who will work directly with the TANF agency on issues of data collection and extraction.
- Have you shared data with other social services agencies in the past?

### Access and Permission

- What is the process for requesting access to educational data?
- How long does this process usually take?
- What legal or policy restrictions should we be aware of (e.g., FERPA, state-level privacy rules)?
- Do you provide de-identified student-level data, or only aggregate data?
- Are there any costs or fees associated with a data request?



# **Hearing from States: Experiences Collecting School Records**



## Minnesota's Early Childhood Longitudinal Data System (ECLDS)

Elizabeth Borchert, PhD | Agency Policy Specialist, DCYF  
John Burczek Dreier, PhD | ECLDS Research Scientist, DCYF

September 25, 2025



**MINNESOTA**  
EARLY CHILDHOOD  
LONGITUDINAL DATA SYSTEM

[eclds.mn.gov](http://eclds.mn.gov)

# Minnesota's P-20W system



## ECLDS+SLEDS

Early Childhood Longitudinal Data System  
Statewide Longitudinal Education Data System





ECLDS provides data, analytics, and insights that drive action and continuous policy, program, and practice improvement to support children and families.

ECLDS Purpose

# ECLDS Data Partnerships and Support



## Legislative authority

Minnesota Statutes 2021 127A.70 Subd. 2(b) Under the direction of the P-20 Education Partnership Statewide Longitudinal Education Data System Governance Committee, the Office of Higher Education and the Departments of Education and Employment and Economic Development shall improve and expand the Statewide Longitudinal Education Data System (SLEDS) and the Early Childhood Longitudinal Data System (ECLDS) to provide policymakers, education and workforce leaders, researchers, and members of the public with data, research, and reports to:

- (1) expand reporting on students' educational outcomes for diverse student populations;
- (2) evaluate the effectiveness of early care, educational, and workforce programs; and
- (3) evaluate the relationships among early care, education, and workforce outcomes.

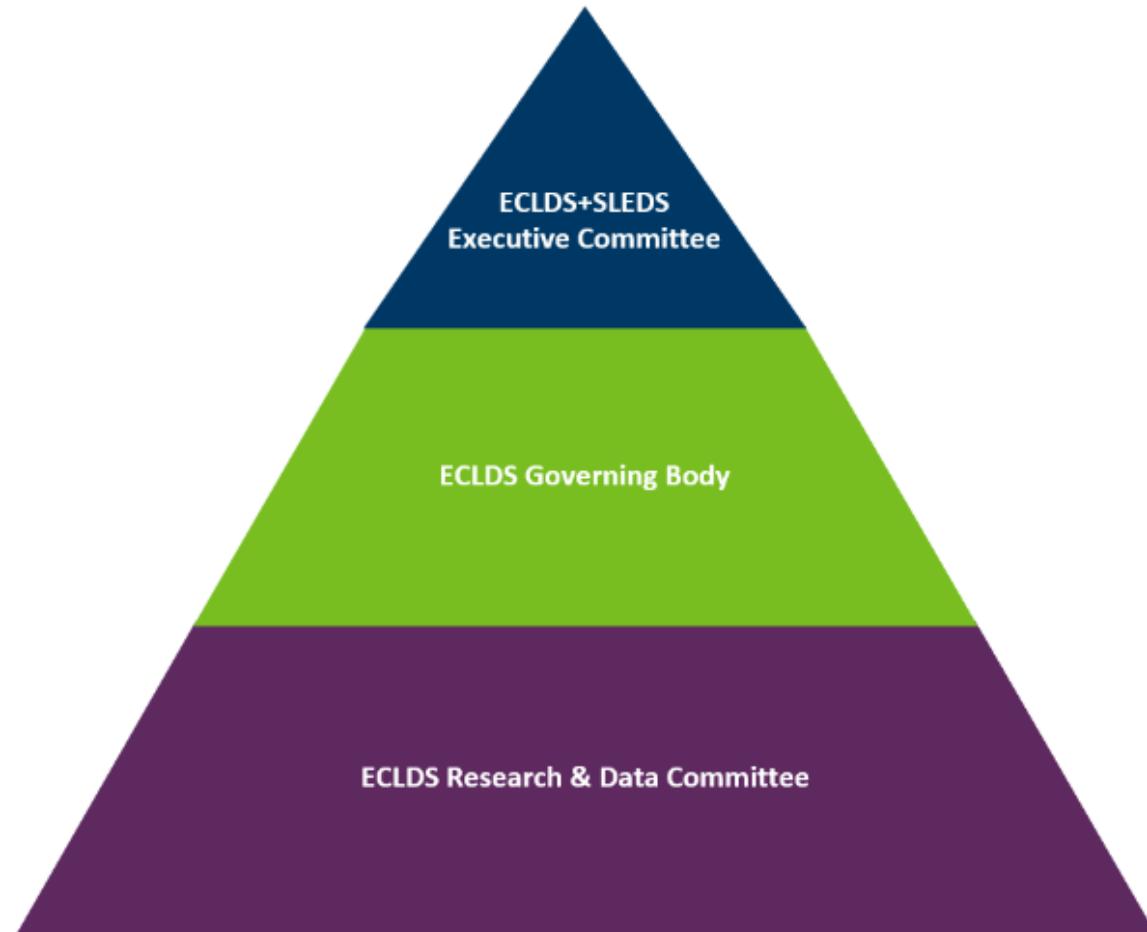
To the extent possible under federal and state law, research and reports should be accessible to the public on the Internet, and disaggregated by demographic characteristics, organization or organization characteristics, and geography.

*See full text of [MN P-20 Education Partnership statute](#).*

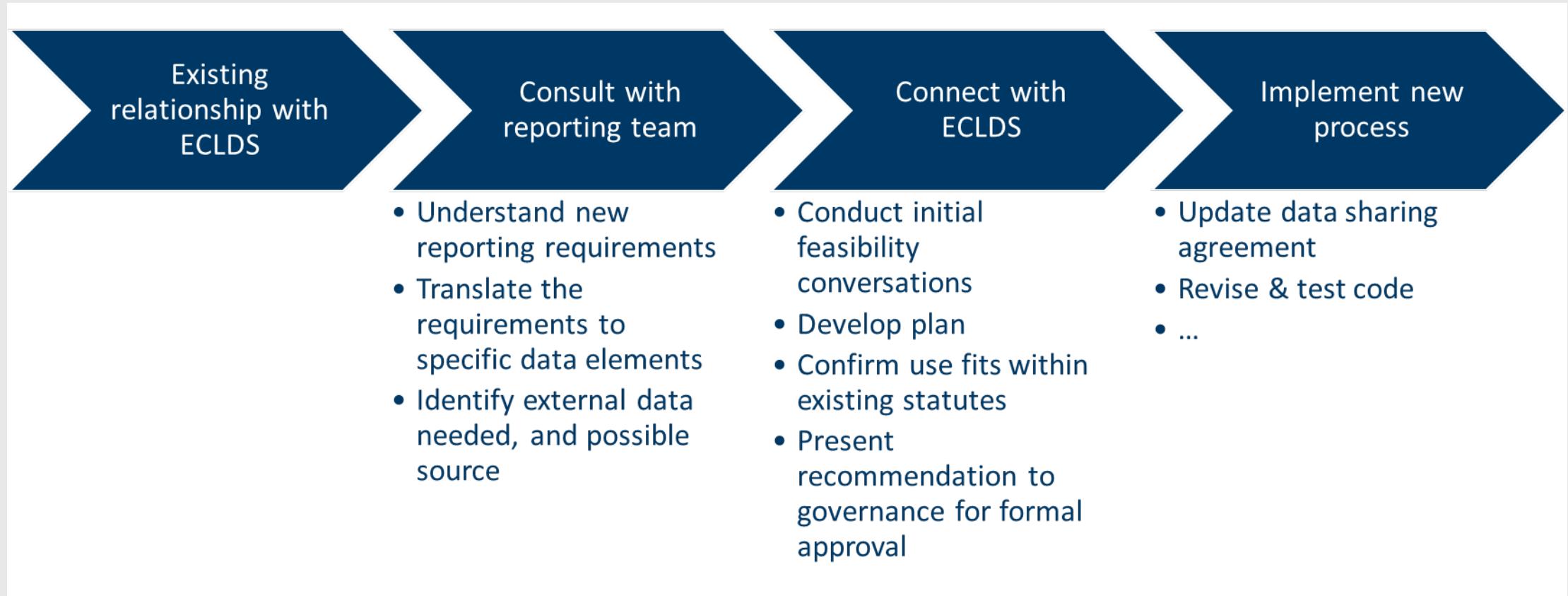
# Relevant Data Sharing Statutes

- 34 C.F.R. Chapter 303 for early intervention program for infants and toddlers with disabilities; - 45 C.F.R. § 303.21 for child support;
- FERPA, the Family Education Rights and Privacy Act, 20 U.S.C. 1232g;
- Minnesota Statutes, 125B.07, requirement to maintain data on students;
- Minnesota Government Data Practices Act, Minnesota Statutes Chapter 13;
- Minnesota Statutes, 13.05, subdivision 7;
- Minnesota Statutes, 13.3805 and 13.3806; and
- Minnesota Statutes, 13.46, on welfare system data.

# Governance Process for Proposals on Research and Data Use



# Connecting FRA education outcomes reporting with ECLDS



# Which education data source(s) are you trying to collect?

- MN Department of Education (MDE)
  - Regular high school diploma
  - State-defined alternate diploma administered by MDE Adult Basic Education
    - Standard Adult High School Diploma
    - K-12 Credit Diploma Completion
    - Test-Based High School Equivalency Diploma
      - General Educational Development (GED)
      - High School Equivalency Test (HiSET) – *currently not in our integrated data system*

Sources: [MDE Adult Basic Education](#)

# Matching Process

- Records throughout the integrated data system are linked using a combination of exact and probabilistic matching
  - See [Evolution of Data Linking](#) document for more information

# Possible Challenges and Surprises

- Connect with your SLDS early to ensure your work can get added to the prioritization plan
- New data sharing agreements take time and engagement
- Getting internal access to relevant data from SLDS
- Sustainable matching/linking process
- Identifying all the possible educational data
  - Enrollment
  - All types of secondary diplomas and alternatives

# Resources

- Common Education Data Standards (CEDS): [ceds.ed.gov/](http://ceds.ed.gov/)
- Email: [dataanalytics.els.dcyf@state.mn.us](mailto:dataanalytics.els.dcyf@state.mn.us)

# Questions?

Email: [dataanalytics.els.dcyf@state.mn.us](mailto:dataanalytics.els.dcyf@state.mn.us)

[eclds.mn.gov](http://eclds.mn.gov) | [sleds.mn.gov](http://sleds.mn.gov)



# Hearing From States



- How and why did your agency first decide to pursue education administrative data?
- Which education data source(s) are you trying to collect data from?
- Who were your first points of contact, and how did you identify them?
- What internal steps did you take before reaching out to the education agency?
- How did you navigate FERPA and state-specific data privacy rules?
- How long did it take to finalize the data sharing agreement?
- What were the biggest challenges you encountered, and how did you address them?
- Were there any surprises that you wish you had known about earlier, or any advice/tips you would give to an agency just beginning this process?



# Step-By-Step Process (Continued)



# Step 4: Negotiate and Finalize the Data Sharing Agreement



## **Key elements of an agreement:**

- ✓ Parties involved and data ownership
- ✓ Specific variables and formats
- ✓ Legal compliance (FERPA, state laws)
- ✓ Data security protocols
  - Secure transfer and storage
  - Limit access to authorized users
- ✓ Data sharing and destruction timeline
- ✓ Legal review by both agencies



# Step 5: Receive, Validate, and Document Data



- ✓ Confirm all requested data was received
- ✓ Perform quality checks
  - Check for missing or inconsistent data
  - Confirm the results are what you expected (e.g., data covers the correct period, includes the requested sample, results are in an expected range, etc.)
  - If possible, cross-check with self-reported information from other sources, such as TANF system or surveys
- ✓ Document any data issues and request documentation from provider

# Key Takeaways

- ❖ Start early – approvals take time
- ❖ Build strong relationships with data providers
- ❖ Keep requests clear and specific
- ❖ Prioritize privacy, security, and compliance

# Questions?





# POLLS: Seeking Your Input on Future Events and Topics



# Developing Future Events and Topics



- Looking ahead, we plan to continue holding **webinars** on topics related to the FRA reporting requirements
- In 2026, we also plan to organize and facilitate **working groups** where small groups of states can meet to actively share ideas and learn from each other
- In the next few slides, we are **seeking your input** on future topics as well as gauging interest and preferences for the working groups

# Poll 1

What topics would be helpful for future **webinars** to cover? (Select all that apply)

- Additional survey guidance
- Additional school records data acquisition guidance
- Identifying eligible population (including confirming exiters)
- Identifying data sources
- Reviewing additional case scenarios
- Data sharing agreements
- Other (please note in the chat!)
- None

If you think of any topics after the event, please send your ideas to: [tanfdata@acf.hhs.gov](mailto:tanfdata@acf.hhs.gov)

## Poll 2



Would you be interested in joining a small, focused **working group** to actively exchange ideas and challenges on a **specific topic** related to the FRA reporting requirements (such as administering a survey)?

- Yes, interested
- No, not interested
- Not sure

(If YES, you will have the opportunity to weigh in on the **topic** and **frequency** of these meetings in the next poll questions)

# Poll 3



If you are interested in joining a working group, please rate what **topics** you would want to focus on with the group on a scale of 1 to 3, where 1 = “not interested” and 3 = “very interested.”

- Fielding a survey
- Collecting administrative records
- Supplemental work outcomes report
- Other (if you don’t have other ideas, please leave blank or write N/A)

If you think of any topics after the event, please send your ideas to: [tanfdata@acf.hhs.gov](mailto:tanfdata@acf.hhs.gov)

# Poll 4

If you are interested in joining a working group, **how regularly** would you prefer to meet?

- Once a month
- Every other month
- Once a quarter
- Other (please write in the chat!)
- Not sure

# UPCOMING EVENTS

Keep an eye out for future events in the coming months and next year!



**Additional guidance:**

<https://www.acf.hhs.gov/ofa/law-regulation/tanf-provisions-fra-2023>

**Final report forms and instructions:**

<https://www.acf.hhs.gov/ofa/programs/tanf/reporting-instructions>

**Secondary School Attainment Measure Instructions:**

<https://acf.gov/sites/default/files/documents/ofa/2A.Instructions-secondary-school-attainment-measure.pdf>

**Technical Assistance Resources:** <https://peerta.acf.hhs.gov/total>

**For questions and requests for assistance, contact the TANF Data Division:**

[tanfdata@acf.hhs.gov](mailto:tanfdata@acf.hhs.gov)

