

Cradle-to-Career System Data Suppression Protocol for Summary Data

The Cradle-to-Career System data suppression protocol is based on an extensive review of legal requirements and statistical methods that was conducted by the California Health & Human Services Agency regarding the federal Health Insurance Portability and Accountability Act (HIPAA) and California's Information Practices Act (IPA).¹ It also references position papers by the National Center for Education Statistics.² HIPAA and IPA requirements align with (and exceed) those required for Family Educational Rights and Privacy Act (FERPA).

For Cradle-to-Career System public-facing tools, including the dashboards and query builder, and for summary data released through the data request process, the following mechanisms will be used to protect the identity of individuals.

To facilitate the ability of non-researchers to make sense of the information, all figures will be expressed as whole numbers, and in all cases where figures are unsuppressed, counts will be included to contextualize rates.

In cases where access to anonymized, individual-level data are approved through the data request process, a Disclosure Review Board will review any data before they can be removed from the secure data enclave. The Disclosure Review Board will adhere to the policies of the data providers that are participating in the data request.

The minimum values for suppression are a preliminary recommendation that should be tested once the data system is built to ensure that the protocol provides sufficient protections for individual identities while providing usable data.

¹ California Health and Human Services (2016). *Data De-identification Guidelines*.

² National Center for Education Statistics. (2010, December). *Statistical Methods for Protecting Personally Identifiable Information in Aggregate Reporting*.

<https://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2011603> and National Center for Education Statistics. (2011, October). *Statistical Methods for Protecting Personally Identifiable Information in the Disclosure of Graduation Rates of First-Time, Full-Time Degree- or Certificate-Seeking Undergraduate Students by 2-Year Degree-Granting Institutions of Higher Education*.

<https://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2012151>

- 1) Information will not be released for data points that include information on less than 30 people in the overall sample (overall denominator). In cases where information has been suppressed, the count of individuals will not be displayed.

Example where there are less than 30 people in the denominator for an overall figure

	<i>Percentage</i>	<i>Count</i>
<i>Among Middletown Unified District 2018 graduates who enrolled in UC San Diego and graduated with a bachelor's degree, the number who earned a degree in Biology</i>	<i>22%</i>	<i>2 / 9</i>

Query builder display:

	<i>Percentage</i>	<i>Count</i>	<i>Missing Information</i>
<i>Among Middletown Unified District 2018 graduates who enrolled in UC San Diego and graduated with a bachelor's degree, the number who earned a degree in Biology</i>			<i>Fewer than 30 people</i>

- 2) Information will not be released for data points that include information on less than 11 people in a specific category (category denominator), excluding cases where there are no people in that category. If there are more than zero but less than 11 people in any category, then the next largest value will be suppressed until there are at least 11 people in the pool of suppressed individuals. In cases where information has been suppressed, the count of individuals will not be displayed. The Not Reported category will be suppressed in cases where one or more other categories has been suppressed, unless all other categories are unsuppressed and there is no data that falls into the Not Reported category.

Example where there are no people in only the Not Reported category

Underlying data:

Graduates of Biology Programs Who Attained a Living Wage		
	Percentage	Count
Foster Youth	85%	11 / 13
Not Foster Youth	82%	241 / 294
Not Reported	--	0 / 0

Query builder display:

Graduates of Biology Programs Who Attained a Living Wage			
	Percentage	Count	Missing Information
Foster Youth	85%	11 / 13	
Not Foster Youth	82%	241 / 294	
Not Reported			Not applicable
Total	82%	252 / 307	

Example where there are less than 11 people in only one category

Underlying data:

Graduates of Biology Programs Who Attained a Living Wage		
	Percentage	Count
Students with a Disability	29%	2 / 7
Students that Do Not Have a Disability	84%	241 / 288
Not Reported	85%	11 / 13

Query builder display:

Graduates of Biology Programs Who Attained a Living Wage			
	Percentage	Count	Missing Information
Students with a Disability			Hidden to protect individual identities
Students that Do Not Have a Disability	84%	241 / 288	
Not Reported			Hidden to protect individual identities
Total	82%	254 / 308	

Example where there are less than 11 people in more than one category

Underlying data:

Graduates of Biology Programs Who Attained a Living Wage		
	Percentage	Count
American Indian or Alaska Native	--	0 / 0
Asian	78%	31 / 40
Black or African American	30%	3 / 10
Hispanic or Latino	56%	76 / 136
Native Hawaiian or Other Pacific Islander	100%	1 / 1
White	64%	77 / 120
Two or More Races	48%	11 / 23
Not Reported	60%	31 / 52

Query builder display:

Graduates of Biology Programs Who Attained a Living Wage			
	Percentage	Count	Missing Information
American Indian or Alaska Native	--	0	
Asian	78%	31 / 40	
Black or African American			Hidden to protect individual identities
Hispanic or Latino	56%	76 / 136	
Native Hawaiian or Other Pacific Islander			Hidden to protect individual identities
White	64%	77 / 120	
Two or More Races	48%	11 / 23	
Not Reported			Hidden to protect individual identities
Total	60%	230 / 382	

3) To facilitate access to data while protecting individual privacy, when results are suppressed, users of the query builder tool or the data request process will be prompted to view results at a less disaggregated level

Appropriate groupings should be developed as part of the user centered design process. Examples of possible options include:

- Multiple years of data, such as a three-year timeframe rather than a single year
- Group multiple sub-categories together, such as viewing race/ethnicity groupings of *White* and *Non-White* or age brackets of *Age 24 or Older* and *Under Age 24*