



# **Integrated Data Sharing: Feasibility Study and Recommendations for Implementation**

---

Legislative Report

September 2024

## Executive Summary

Workforce development services in Washington and nationally are made up of a complex system spread across multiple agencies and funding streams, each with their own administrative policies and procedures. Navigating these disparate agencies and processes poses a challenge—particularly for individuals with multiple or significant barriers. These individuals may have the greatest need to leverage bundled services but are also those that would experience undue hardship in navigating a fragmented system. Additionally, intake and service planning do not easily transfer from one program to the next. Customers must often start over at each stage of service delivery. This has culminated in “intake fatigue” among jobseekers, who must not only share their personal and, often, difficult story to multiple providers but also experience redundancies of having to complete comparable forms or provide different sets of documentation for similar eligibility requirements.

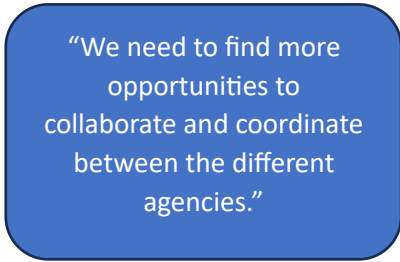
Challenges persist past the intake process, where silos across administering agencies adversely impact effective service planning. Information is not readily or systemically shared across agencies, even in cases where these agencies are serving the same customer. Opacity of information across workforce agencies prevents frontline staff from knowing what services a customer would be eligible for across partner agencies, supports that have already been received, where there are still gaps in services, challenges in coordinating services, or lacking procedures (like automating eligibility or referrals) to better serve jobseekers.

These compounding challenges lead to confusion navigating services, wasted time across intake and service planning, unnecessary frustration, and even cases of participants walking away from services. Surveys, community forums, focus groups, and administrative data review have reaffirmed the known systemic barriers for efficient and effective service delivery.

**Efforts to address these challenges have consistently identified technology and data sharing as a needed step towards an integrated workforce development system.**

Integrated data sharing would remove redundancies that occur at intake, allowing information to follow customers across agencies for needed services. It would also enhance visibility of the full spectrum of services a customer has or needs to be receiving for effective service planning and coordination.

The collective of these challenges reverberates through all aspects of the workforce system, including jobseeker preparation for employment or skills progression and a prepared workforce to meet the needs of employers. These challenges can be addressed by realizing a whole, integrated workforce system in the state—working as a unified body to best serve jobseekers and employers. This project represents the collective multi-agency state workforce system and its shared strategic priority under Washington’s Talent and Prosperity for All (TAP) workforce plan to realize Washington’s mission for a “no wrong door” approach to seamless and coordinated workforce service delivery.



“We need to find more opportunities to collaborate and coordinate between the different agencies.”

Figure 1 History of Data Integration Project



Integrated data sharing as an initiative has a long history at the Workforce Board, which advises the Governor and Legislature on workforce development policy, coordinates training programs, and works to improve workforce services in Washington. This initiative began with the formation of a Common Intake Committee and the Integrated Service Delivery Workgroup in 2016. The Workforce Board commissioned a comprehensive study of system integration improvements to Washington’s Workforce System (2018), where a lack of data sharing was consistently identified as a source of numerous systemic inefficiencies and challenges. The reach of these barriers included operations of service providers and, more detrimentally, negatively affecting the experience and engagement of jobseekers.

The Workforce Board, to best address the mission and mandates of the workforce system partners and stakeholders, received legislative funds in 2022 and again in 2023 to continue working toward the goals of integrated data sharing within the state workforce system, beginning with an investigation of a model interagency governance structure and followed by a programmatic and technical feasibility study that is now culminating an implementation proposal. This effort has engaged and received signed letters of intent (LOIs) from the state data-owning partners composing the state workforce system. The collaborative effort across the state workforce system will address the full lifecycle of program operations, including service delivery, harnessing collective data towards system evaluation and insights, and informing policy and program implementation in a continuous cycle of improvement.

These partners include:

- 1) Department of Labor and Industries (LNI)
- 2) Department of Services for the Blind (DSB)
- 3) Department of Social and Health Services
  - a. Division of Vocational Rehabilitation (DVR)
  - b. Economic Services Administration (ESA)
- 4) Employment Security Department (ESD)
- 5) Office of Superintendent of Public Instruction (OSPI)
- 6) State Board for Community and Technical Colleges (SBCTC)
- 7) Workforce Training & Education Coordinating Board (Workforce Board)

Based on public responses on the TAP Plan, expressed state workforce system needs include “creating a network of service providers to offer integrated case management, meeting all needs of the person together as a SYSTEM” and “creating pipelines for folks to navigate the system and efficiently and effectively access services.”

The Workforce Board has also received strong support and active collaboration with WaTech. The data integration project has strong strategic and tactical alignment with WaTech’s Better Data, Better Decisions, Better Government, Better Washington strategic priority. Subsequently, the data integration project has been identified as one of two “use cases” (or pilots) for WaTech’s enterprise data platform and statewide data ecosystem efforts. The Workforce Board has been actively collaborating with staff in WaTech’s Architecture and Innovation Division since fall 2023 to use the data integration project as a means of guiding and executing on the enterprise IT strategic plan. An additional avenue of partnership with WaTech has taken form under the agency’s competitive Innovation and Modernization Program. The data integration project was one of ten selected projects to receive one-time seed funding for FY 2025 to implement a pilot of the data integration in partnership with WaTech’s Architecture and Innovation division.

The Legislature and Governor have provided consistent support for this impactful body of work. Through funding for the 2023-2025 biennium, the Workforce Board was able to carry out a feasibility study and enact a formal Data Governance Council. This report includes:

- A synthesis of the systemic workforce system challenges
- A landscape analysis of comparable data sharing efforts across the country
- An exploration of applicable federal, state, and agency regulations governing data sharing/use
- An outline of the interagency governance and oversight body for this effort, and
- A project proposal to transform goals to action.

The Workforce Board is presenting this report to the Governor and the Legislature as stipulated by RCW 43.01.036:

"By September 1, 2023, and September 1, 2024, the board must submit a report to the Governor's Office and the appropriate committees of the Legislature. The report should delineate the board's strategy for projects impacting the integrated data sharing initiative. Key inclusions should be: (1) Current status of any information technology projects in progress or under implementation; (2) Funding necessities for these ongoing and impending information technology projects; and (3) Subsequent courses of action for the board's information technology projects."

The investigation into a sound and effective model for interagency data sharing to support service delivery and experience for constituents has identified broad support for implementation and action. The feasibility study and stakeholder buy in, combined with years of calls for better data sharing to support system integration, means that the state workforce system is eager to transform into a customer-centric system in the full lifecycle of service delivery, from intake to exit. The state's workforce system is at a critical juncture to commit to this work and the Workforce Board, reflecting the needs of this multi-agency effort, would like to continue prioritization and investments to accomplish a long-standing need of the workforce system.

### Recommendations

A forthcoming decision package will be submitted in September 2024 to request continued legislative funding towards implementation of this multi-year initiative and ensure that measurable progress is made towards supporting the experience and success of Washingtonians seeking training and employment opportunities.

# Table of Contents

Executive Summary .....	i
Recommendations .....	iv
Background .....	1
Challenges to System Integration .....	2
Coordinated intake & Eligibility .....	2
• Coordinated Intake Form .....	3
• Universal Privacy/Release of Information Consent Form .....	2
• Automated Eligibility Determination .....	2
• Secure Document Repository .....	3
Referrals .....	3
Shared Database/Information .....	4
Outcomes .....	5
Continuing Priority .....	5
WaTech’s Partnership and Collaboration .....	6
Conclusion .....	8
Landscape Analysis .....	9
Analytical Data System .....	9
Preschool, K-12, Postsecondary, and Workforce Longitudinal Data Systems (P20W) .....	9
WIOA Integration .....	10
Illinois .....	10
Idaho .....	11
Louisiana .....	11
Oregon .....	11
Other .....	11
General Statewide Data Hubs .....	11
System Integration for Service Delivery .....	12
Differences .....	13
Resources .....	15
Alignment with Existing State Workforce Projects .....	16
Summary .....	18
Data Governance Council .....	19

Structure .....	19
Data Regulations .....	21
Project Plan .....	21
Phase I .....	22
Phase II .....	23
Phase III .....	24
Timeline .....	25
Resources .....	26
Risk & Mitigation Strategy .....	26
Future Work .....	27
References.....	29
Appendix A - State Comparison of Workforce Data Integration.....	35
Appendix B – Data Governance .....	38
Board Sponsor(s).....	38
Responsibilities .....	38
Managing Entity.....	38
Responsibilities .....	38
Steering Committee .....	38
Responsibilities .....	39
Subcommittees .....	39
Programmatic Subcommittee Responsibilities .....	39
Data Privacy & Regulations Subcommittee Responsibilities .....	40
Data Systems & Technology Subcommittee Responsibilities .....	40
Data Usage & Analytics Subcommittee (Analytics).....	40
Responsibilities .....	40
End User Advisory Group.....	41
Ex Officio Members.....	41
Responsibilities .....	41
Appendix C – Regulations .....	42
Consent .....	42
All State Workforce Agencies and Workforce Local Development Boards.....	42
DVR/DSB .....	42
ESD .....	42

Unique Identifier.....	42
Data Security.....	43
Personnel Data.....	43
SNAP.....	43
Health Data.....	44
Administration & Evaluation.....	44
General.....	44
WIOA.....	44
DVR/DSB.....	44
ERDC/OSPI/SBCTC.....	44
ESD.....	45
Appendix D - Milestones.....	46
Appendix E – Risk & Mitigation Strategy.....	49



## Background

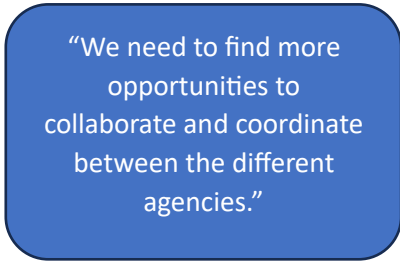
The workforce development services in Washington and nationally are made up of a complex system spread across multiple agencies and funding streams, each with their own administrative policies and procedures. Navigating these disparate agencies and processes poses a challenge—particularly for individuals with multiple or significant barriers. These individuals may have the greatest need to leverage bundled services but are also those that would experience undue hardship in navigating a fragmented system. Additionally, intake and service planning do not easily transfer from one program to the next. Customers must often start over at each stage of service delivery. This has culminated in “intake fatigue” among jobseekers, who must not only share their personal and, often, difficult story to multiple providers but also experience redundancies of having to complete comparable forms or provide different sets of documentation for similar eligibility requirements.

Challenges persist past the intake process, where silos across administering agencies adversely impact effective service planning. Information is not readily or systemically shared across agencies, even in cases where these agencies are serving the same customer. Opacity of information across workforce agencies prevents frontline staff from knowing what services a customer would be eligible for across partner agencies, supports that have already been received, where there are still gaps in services, challenges in coordinating services, or lacking procedures (like automating eligibility or referrals) to better serve jobseekers.

These compounding challenges lead to confusion navigating services, wasted time across intake and service planning, unnecessary frustration, and even cases of participants walking away from services. Surveys, community forums, focus groups, and administrative data review have reaffirmed the known systemic barriers for efficient and effective service delivery.

**Efforts to address these challenges have consistently identified technology and data sharing as a needed step towards an integrated workforce development system.**

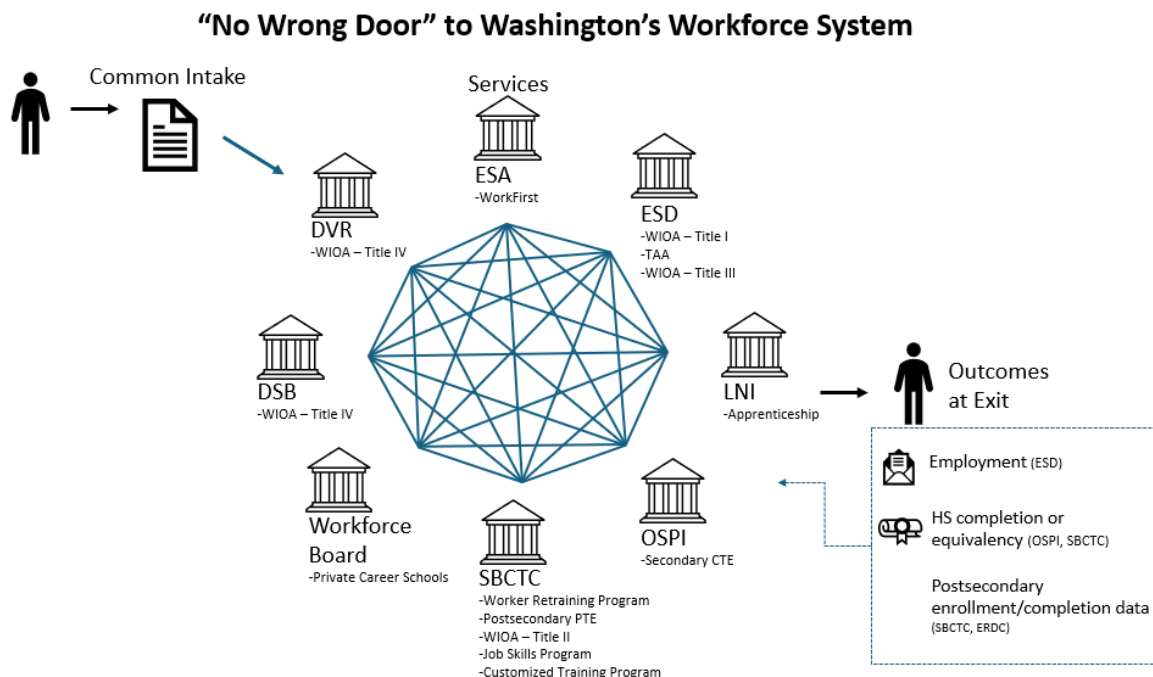
Integrated data sharing would remove redundancies that occur at intake, allowing information to follow customers across agencies for needed services. It would also enhance visibility of the full spectrum of services a customer has or needs to be receiving for effective service planning and coordination.



“We need to find more opportunities to collaborate and coordinate between the different agencies.”

Administering entities have also experienced challenges due to the disconnected data and technology systems. Reporting and performance accountability similarly reflect the disjunction across the state’s workforce agencies. **Despite customers often being served by multiple agencies, reporting and evaluation of programs is typically carried out by funding streams or agencies and does not represent the true integration and bundling of services needed to impact individual outcomes.** Agencies have noted challenges in meeting federal reporting requirements, including reporting on co-enrollment metrics or underreporting measurable skill gains and other outcomes due to the reliance on individual follow-up with jobseekers to verify employment or educational outcomes. Agencies have reported not having access to necessary information to carry out their organization’s statutory mandates, like program evaluation—and must refer to other agencies with access to outcomes data to carry out program evaluations on their behalf. Washington is committed to developing a true “system” of workforce education and training service delivery, including the integration of performance accountability.

The collective of these challenges reverberates through all aspects of the workforce system and can be tackled through a perspective of a whole, integrated workforce system in the state—working as a unified body to best serve jobseekers. This project is to realize Washington’s mission for a “no wrong door” approach to workforce service delivery.



## Challenges to System Integration

The Workforce Board had identified the need for data integration as a critical priority for the Talent and Prosperity for All (TAP) strategic state workforce plan since 2016. Early efforts to make progress on this strategic priority included the Workforce Board contracting with Community Attributes Inc. (CAI) to carry out a comprehensive review of Washington’s workforce services and provide recommendations for improvements to service integration (CAI, 2018). This included interviews and focus groups with frontline staff across Employment Security Department (ESD), the Department of Social and Health Services (DSHS), State Board for Community and Technical Colleges (SBCTC), and the Department of Vocational Rehabilitation (DVR). The stated challenges and recommendations for systems improvement below recount the findings from this study.

### Coordinated intake & Eligibility

Program eligibility across workforce programs is generally targeted and has unique eligibility requirements. While resources for jobseekers are available to determine eligibility, such as Washington Connections or WorkSource Washington, self-guided eligibility processes may suggest that a jobseeker is eligible for services only to uncover they are not, following a deeper conversation with a case manager. This not only leads to frustration and wasted time, but also confusion for jobseekers in navigating services. Support from case managers, who have expertise and knowledge in navigating the workforce system, is needed. However, intake and even subsequent information sharing between agencies serving

the same customer is siloed. Several themes emerged from staff feedback surrounding a coordinated intake form, universal privacy/release of information consent form, sharable document repository, and automation of eligibility determinations. These will be expanded in the following sections.

- *Coordinated Intake Form*

The majority of staff expressed an interest in a coordinated intake form, where jobseekers often complete similar forms or provide similar information. This process should be electronic and easily integrated into a multitude of workflows in use. The form would need to accommodate flexibility required of programs, like when funding streams change or when co-enrollment opportunities arise. One example of how a coordinated intake form could be utilized would be if information from the coordinated intake form could pre-populate information on their intake screens.

Through a study of intake forms across programs, several key pieces of information observed across most programs included the following fields:

- First name
- Last name
- Date of birth
- Address
- City
- State
- Zip
- Phone
- Email
- Sex
- Race/Ethnicity
- Disability
- Highest education level
- Veteran
- Employment status
- Citizenship status

- *Universal Privacy/Release of Information Consent Form*

A necessary component of the intake process and a precursor to compliant data sharing is the implementation of a universal privacy or release of information consent process with jobseekers. With a single, system-wide release of information form, customers could determine or provide permission for relevant organizations to receive information from the coordinated intake form as well as other information like service progress. Staff have noted the significant time dedicated to helping customers sign multiple release of information forms as well as tracking which agencies with whom they are or are not able to share personal information based on signed releases. Having a blanket release form will support efficiency in serving jobseekers but also pave the way for the needed data sharing to improve service planning and delivery.

- *Automated Eligibility Determination*

Respondents largely agreed that an automated, online tool for eligibility determination across workforce programs would allow them to better help customers navigate services for which they are eligible. As one manager stated, “learning eligibility criteria is the least valuable thing my staff spend time on. I wish this was automated.” A coordinated intake process enables seamless eligibility determination across workforce programs, even if the case manager services only one program or agency. This fulfills the “no wrong door” approach to service delivery and will also streamline the request for similar information across program intake procedures. As represented in Figure 2, the analysis across the agencies identified common eligibility information that has the potential for a streamlined intake process across programs: age, school/education requirements, work requirements, citizenship/residency, income, and veterans/active military status.

Figure 2 Eligibility Determinants Across Programs

Program Eligibility Analysis													
	WIOA Title 2	Opportunity Grants	Worker Retraining	WIOA Title 1					Training Benefits Eligibility Program	WIOA Title 4	TANF	BFET	Veterans Employment and Training
				Adult Basic	Adult Training	Dislocated Worker	Youth Out of School	Youth In School					
Age	At least 16			At least 18			16-24	14-21			At least 16	At least 16	
School/Education Requirements	Not in school						Not in school	In school			Working or in school		
Work Requirements			Several categories of employment			See Detail In Appendix				Disability is an impediment to work	Working or in school	Must be able to work	
Residency		WA State Resident		US Citizen/eligible to work in US	US Citizen/eligible to work in US	US Citizen/eligible to work in US	US Citizen	US Citizen			US Citizen (check details) WA State Resident	US Citizen (check details) WA State Resident	
Income	Yes			Yes		Yes	Yes			Yes	Yes		
Veterans/Active Military			Yes	Yes					Yes				Yes

Note: The Trade Adjustment Assistance and the Dislocated Worker program were excluded from the table, due to unique eligibility requirements.

Automating eligibility determinations would not preclude continued access to up-to-date eligibility information and documentation.

- *Secure Document Repository*

For verification and even for compliance purposes, case managers indicated that they would confirm all information provided (from an intake form or from a referral) with a customer. A document repository was requested, where the documents of consenting participants could be stored and shared to support providers in determining eligibility when needed—in accordance with security protocols and privacy procedures determining permission and access. This would additionally benefit jobseekers, who undergo a repetitive process of providing documents and information when receiving services from multiple programs. This may be particularly beneficial for vulnerable populations, like individuals that are homeless, that may have added difficulty in maintaining needed documentation for service eligibility.

## Referrals

The third most frequently cited need was an improved referral system, encompassing the sharing of relevant and necessary data to help participants as well as the ability for case managers to coordinate between each other. Presently, there is not only a lack of a structural referral system or even expectations to collaborate cross-agency. The general lack of consistency regarding making referrals or sharing information between case managers was cited as one of the most frustrating experiences for frontline staff. Factors included challenges navigating multiple releases of information, data sharing being largely driven by personal relationships between staff, and not knowing with whom to share information (the last of which was reported among 27 percent of respondents).

“Knowing not only where a customer is receiving services but what services they are receiving would make my limited time much more effective, as I wouldn't need to re-do work someone else had already done. I could also be more effective in assisting customers by identifying service gaps.”

A whopping 63 percent of respondents indicated a concern about privacy rules as inhibiting information sharing. Additional challenges included a burdensome process, sharing of information as falling outside of their responsibilities, or belief that shared information won't be utilized. Subsequently, 58 percent of respondents indicated that they do not typically receive any information pertaining to a referral.

The lack of data sharing does not signal a lack of interest. Staff indicated that a standardized referral process and exchange of relevant information across agencies, compliant with state and federal regulations, would support better and more efficient service delivery for customers. Certain information is deemed particularly helpful, such as intake data, customer goals, and enrollment services a customer/student was receiving. As stated by a survey participant, “Knowing not only where a customer is receiving services but what services they are receiving would make my limited time much more effective, as I wouldn't need to re-do work someone else had already done. I could also be more effective in assisting customers by identifying service gaps.” In other cases, a customer is responsible for following through on a referral to another agency, in which case there may be duplication of work for staff and, without staff coordination, may also lead to cases where “the referral wasn't the best fit and [the customer actually] need[ed] to go to a different program.”

## Shared Database/Information

All of the areas discussed above would necessitate sharing of information through a connected data system. Nearly all frontline staff identified data sharing as a challenge and a need, with 32 percent specifically desiring a common data system. Figure 3 details the desired information that would support collaborative case management, such as referrals. Numbers reflect the percentage of respondents that deemed a data element as helpful towards service delivery, unless otherwise noted.

Figure 3 Desired Information for Systems Integration

Summary of Most Highly Desired Data by Practice Area					
Shared information would: (Paraphrased)	Lead to faster service	Make it easier to assess eligibility	Desired data for a referred customer*	Make it easier to coordinate services	Make it easier to share customers
Enrolled services	34%	26%	4.10	41%	41%
Employment status	14%	43%	4.44	10%	
Eligible services	13%	28%	2.92		
All staff contact			5.53		10%
Program/training progress				13%	23%
Education status/history		14%	4.45		
Referring staff contact			5.12		
Assessment test results			4.51		
Shared enrollment data	24%				
Secure, common info exchange system					18%
Accessibility/disability information		21%			
Contact information					12%
Case notes	16%				
Medical records		17%			
Service/training plan			4.32		
Barriers to employment		11%			

\*Scored based on ranked scale of 1 to 7, with one being most important

The dominant areas of data desired were enrolled services, including employment or training plans and goals. The ability to access enrolled services has a multitude of benefits, including identifying gaps in service, coordinating between services, and reducing duplication. The second most desired information was employment status. Access to the Unemployment Insurance database was indicated as helpful, as frontline staff feel it contains most of the information needed, like work history and salary information. Work history is a necessary data point at intake, and customers cannot always provide or choose to share a complete accounting of their work history, including employment gaps. Salary information would additionally provide insights surrounding program eligibility.

Additional information that frontline staff indicate would be helpful include:

- Indicators for how recently information has been updated, as some information may change regularly or frequently.
- Contact information for participants' case managers.

#### Outcomes

A coordinated and systematic means to track outcome and placement information had also been highlighted. Many responses indicated a desire for a shared information system that would allow for streamlined tracking of client progress as well as outcomes and placements across programs.

There is a reliance on following up with individuals and using jobseeker-provided documentation to report such things as measurable skill gains. There is a known underreporting that occurs, since it can be a challenge to connect and retrieve documentation from jobseekers following exit. There would be operational benefits to leveraging existing partner data, which is deemed a valid source of information, towards meeting mandated reporting requirements.

#### Continuing Priority

The needs for integrated information across the workforce system persists and data sharing and coordinated intake are highlighted as key priorities to achieve systems integration. The sentiments and needs expressed in the 2018 system integration research study are echoed in public and local feedback about the workforce system collected over the past year. Several themes emerged in these forums pertaining to information and systems integration:

A commonly cited challenge is that the workforce system is too siloed from an administrative, funding, and programmatic perspective, creating structural barriers for the communities served. Silos of data systems further creates challenges for program management, including creating burden for applicants and being limiting in assessing program impact. Experiences for customers were also identified as negatively impacted as it is difficult to know where to get the right information or who to contact. And there is limited support for referrals, where an actionable recommendation is to implement "warm handoffs," or a personal way in which to introduce partners when jobseekers are receiving multiple services.

"We are good at admiring problems, and not adhering to plans." (local survey response regarding data utilization)

One of the noted strengths of the workforce system is that services are comprehensive. But the continued challenges lie with the fragmentation of the workforce system, where funding is restricted by what or how it can be used. Additionally, infrastructure remains fractured, with notable challenges in effective data collection, timely data sharing, and referrals. Limited systemic information sharing negatively affects cohesive, seamless, and collaborative offering of services for clients.

Identified best practices to enhance the workforce system include integrated case management and coordinated referrals to support individuals as a collective system. Additionally, further suggestions include braiding and blending funding streams across the workforce system to diffuse financial strain on any one program and drive positive outcomes for customers.

These themes are echoed throughout local surveys among system partners. Regarding a collective workforce system, sentiments included:

- Integrated Service Delivery
  - A feeling of isolation from the greater workforce system
  - Silos creating barriers for workforce staff to serve clients
  - Partners wanting greater integration and collaboration with state agencies
  - System feeling fragmented
- Improved Data Sharing
  - There are currently limitations and restrictions of data sharing from the school system
  - A strong desire for data to be able to meaningfully assess effectiveness
  - Data sharing across partners is needed to determine whether customers are experiencing positive impact
  - Accountability is also a critical consideration, with a usability plan for information being needed

Regarding the utilization of data, a respondent noted, “We are good at admiring problems, and not adhering to plans.” Another noted that there is a distinction between “systemic collaboration” and “integrated service delivery.” This data integration project is meant to realize core components of the TAP strategic priority of system integration, including comprehensive data-sharing and coordinated intake.

### [WaTech’s Partnership and Collaboration](#)

Alignment with the priorities of the workforce data integration initiative is to provide responsible stewardship of data amongst and across the state’s workforce system while exercising judicious investment and allocation of resources. To this end, heavy coordination with the Washington Technology Solutions (WaTech) agency to leverage existing state investments and resources has been explored to ensure efficient and effective implementation of this initiative.



# Enterprise IT Strategic Plan 2023-2025

Connected Government, Stronger Communities, Better Washington

## Goal #1 Create a Government Experience that Leaves No Community Behind

**Goal Statement:** Through a connected government that emphasizes service delivery and the experience of those we serve, we can achieve equitable outcomes across our communities.



## Goal #3 Innovative Technology Solutions Create a Better Washington

**Goal Statement:** Prioritize solutions emphasizing access, technology, and innovation to address systemic societal challenges and align our decision-making for those we serve.



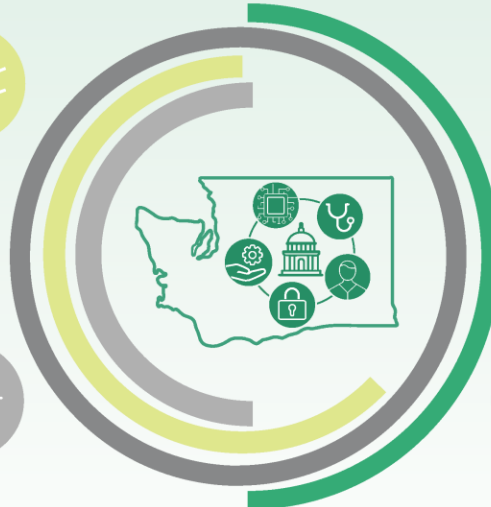
## Goal #2 Better Data, Better Decisions, Better Government, Better Washington

**Goal Statement:** Use data and insights to improve the experience of those we serve, prioritize service improvements, drive strategic decisions, and improve transparency.



## Goal #4 Transform how we work. Best Workforce Ever.

**Goal Statement:** Attract and retain technology talent, advance our agencies' skill sets, instill an innovation culture, and establish new and agile processes and practices to achieve our future vision.



**Our Pillars** Digital trust | Shared governance | Equitable outcomes | Service excellence

**Our Values** Human-centered | Inclusive ideas | Courageous innovation | Accessibility | Nimble | Community + connectivity

WaTech's Enterprise IT Strategic Plan defines the agency's goals and priorities biennially. The four goals of the strategic plan for 2023-2025 include Goal #2: "Better Data, Better Decisions, Better Government, Better Washington". This goal prioritizes the use of data and analytics to improve, among others, service to the state's constituents (WaTech, 2023). Action Plans govern the implementation of the Enterprise IT Strategic Plan. The three that are pertinent to the workforce data integration project include: Washington State Cloud, Enterprise Architecture, and Enterprise Cloud Computing Program.

The Workforce Board's data integration efforts have many shared priorities and goals with the Better Data, Better Decisions, Better Government, Better Washington goal. The cornerstone of the project is to prioritize improvements to service and customer experience through connected data and information systems. This breaks down the data silos and fosters transparency throughout the state workforce system, all of which have been continuously identified as challenges and barriers to effectively and optimally serving Washingtonians. The coordination of data and information across workforce-supporting agencies also ensures shared strategic decision-making and enhancing shared information to draw unprecedented insights on the state workforce system to engage in a continuous cycle of improvement.

The Workforce Board has also received strong support and active collaboration with WaTech. The data integration project has strong strategic and tactical alignment with WaTech's Better Data, Better Decisions, Better Government, Better Washington strategic priority (Goal 2). Subsequently, the data integration project has been identified as one of two "use cases" (or pilots) for WaTech's enterprise data platform and statewide data ecosystem efforts. The Workforce Board has been actively collaborating with staff in WaTech's Architecture and Innovation Division since fall 2023 to use the data integration project as a means of guiding and executing on the enterprise IT strategic plan. As a part of this shared

work, the Workforce Board sits on the Goal 2 planning team and the Workforce Board's Project Lead is serving as the Enterprise Statewide Data Ecosystem Objective team lead.

An additional avenue of partnership with WaTech has taken form under the agency's Innovation and Modernization Program. The data integration project was one of ten selected projects to receive funding for FY 2025 to adopt modern and innovative technologies to meet critical business needs. A pilot of the data integration project will occur through this one-time seed funding, with continued collaboration with WaTech's Architecture and Innovation Division to integrate into the enterprise platform.

### Conclusion

These requested system improvements are not meant to take the place of personalized support and engagement with jobseekers. Rather, these serve as improvements to better facilitate agency and case management supports for jobseekers. As a One Stop manager shared, "I'm a little leery of a database that gets our staff to look at a computer instead of a person. So, keep in mind as it's being built that human contact should remain in there. With the systems we have we already spend too much time looking at screens and typing on keyboards instead of looking at the person we're talking to."

## Landscape Analysis

The Workforce Board engaged in a comprehensive review of state efforts to integrate workforce data to understand previous and ongoing efforts to inform procedural and implementation decisions. Common themes arose from state-to-state efforts, including infrastructure (or lack of), developing an identity matching solution, establishing a coordinated intake portal, data security policies, and formalizing data governance and decision-making bodies. Appendix A includes an overview of state efforts taking place or planned nationwide addressing integration of workforce data. Identified best practices and limitations of approaches identified through these state efforts will be discussed in further detail below.

### Analytical Data System

States have a long-standing history of integrating data across agencies and substantive areas for the purposes of carrying out reporting or analytical functions. These initiatives include the P20W, WIOA integration, and central statewide data repositories. The priorities and use-cases for these bodies of work are distinct and manifest in different implementation strategies. The efforts across each area are described further.

#### Preschool, K-12, Postsecondary, and Workforce Longitudinal Data Systems (P20W)

A prevalent effort that has impacted the integration of workforce data has been through the establishing of state preschool through workforce longitudinal data systems. This encompasses preschool, K-12, postsecondary, and workforce and is often referred to as “P20W” (WestEd, n.d.). Early data integration across education and workforce dates back to 2006, with a total of 40 states now overseeing a P20W data system with varying approaches to implementation. However, comprehensive data integration has been limited, with only 21<sup>1</sup> of those 40 states including any workforce-related data. Only 15<sup>2</sup> of those states capture data across all four of the domains listed above (ECS, n.d.). Washington’s Education Research and Data Center (ERDC) P20W data system encompasses technical college, secondary career and technical education, apprenticeship, and wage data—with efforts to continuously expand.

A notable limitation of integrating workforce data into these longitudinal data systems is the inconsistency observed between states regarding the types and depth of data included. While 15 states are able to tout a comprehensive P20W system, at least nine<sup>3</sup> of those 15 states only capture UI and/or wage data as a part of the workforce domain and do not include more detailed workforce data like training, education, or service information. Washington is among one of the five states that includes more meaningful workforce data in the P20W system, alongside Connecticut, Mississippi, Ohio, and Virginia. States like Arkansas and California are actively expanding their P20W data systems to incorporate workforce data as well. The data across these P20W systems with expanded workforce data include such information as:

---

<sup>1</sup> The source indicates 26 states have a P20W data system that includes workforce data. However, in researching each data system, 5 were not found to include any workforce data—based on publicly-available information. The count has been adjusted for this report.

<sup>2</sup> Similar to above, 4 of the 19 states identified in the source to include all four domains were not found to include workforce data—based on publicly-available information. The count has been adjusted for this report.

<sup>3</sup> The number may be higher, as the data dictionaries of four of these states could not be found to confirm which workforce data is included in their P20W data systems.

- Employment barriers
- Basic skills status
- Skills/vocational training and/or services
- Cost of training/service
- Dates of training/service
- UI/wages
- Dates of last contact

### WIOA Integration

Federal policies governing workforce systems is primarily centered around the Workforce Innovation and Opportunity Act (WIOA). Passed in 2014, WIOA details the delivery of federally funded employment services, workforce development, basic education for adults, and vocational rehabilitation activities for people with disabilities. The goal of WIOA is to improve the quality of the workforce, reduce welfare dependency, increase economic self-sufficiency, meet skills requirements of employers, and enhance the productivity and competitiveness of the nation. WIOA 101(d)(8) specifies the goal of integrated systems towards improved service delivery and reporting of systemwide performance and accountability measures. Additionally, guidance on WIOA state plans encourages the sharing of labor market information and other data across agencies, irrespective of inclusion in the WIOA state plan, to support data-informed decisions (U.S. Department of Education, 2023). Several states, as a part of their WIOA state plans, are prioritizing data integration efforts.

DOL's Employment and Training Administration advises, "whenever possible", to move towards the unique identifier for individual or information tracking. The development of a unique workforce system identifier is necessary to link relevant data across disparate information systems and will also be a needed step to move away from the reliance of social security numbers as one of the key identifiers for participants.

### Illinois

Illinois has six core WIOA programs that are being administered across four core agencies, which is similar to the decentralized structure observed in Washington. Each of these four agencies maintains their own reporting system. The Illinois Office of Innovation and Technology, under the jurisdiction of the Governor's office, will be carrying out a project for "interoperability solutions" to share data between the agencies. This system will establish a coordinated intake system and assign a universal participant identification number at that time. Data would be sent to respective agencies through an application programming interface (API), alongside useful information such as determination of eligibility criteria. Through early exploration, the determination was not to retire existing systems across the agencies; a federated solution was deemed the optimal solution for the state's WIOA efforts (U.S. DOE, 2020a).

## Idaho

Idaho has pursued a similar model. Presently, agencies maintain their own information systems, which are coalesced in a federated data system across core WIOA programs, similar to the state's longitudinal data system. This system allows states agency and control over their own respective data. While a longitudinal data system for WIOA data is the targeted goal, particularly in supporting state and federal reporting requirements, the state has noted that coalescing the data and other data exchange processes are still in progress (U.S. DOE, 2022a).

## Louisiana

Louisiana is pursuing an expansion of existing data integration efforts. In Louisiana, several programs (Title I, Title III, and UI) share an integrated management information system called HiRE. This consolidated system centralizes filing of claims, application processes, and record-keeping for services, trainings, assessments, or counseling. In addition to a streamlined intake and case management process, this system affords the state with the needed consolidation of data for federal and state reporting. The state's rehabilitation services are currently in a separate system called AWARE; the state is pursuing plans to expand data integration across the four WIOA programs to support reporting and analyses (U.S. DOE, 2020b).

## Oregon

Oregon similarly has a federated data system but is identified as having the most established data integration system across WIOA programs. Their WorkSource Oregon Management Information System (WOMIS) is a network of integration applications, including several case management systems used across different core WIOA programs. WOMIS provides a common registration module that supports customer intake and program eligibility determinations and "push[es]" information to respective case management system(s). The state also has a centralized data warehouse for WIOA program data. Oregon's Employment Department manages a data warehouse, where program data is copied and made available for use with data visualization and business intelligence software. The state also has a Performance Reporting Information System (PRISM). Many workforce programs submit data to PRISM, like WIOA Title I, III, SNAP, Apprenticeship, TAA, and UI (with possibility of Titles II and IV to be included; (U.S. DOE, 2022d)).

## Other

Two additional states, IOWA (U.S. DOE, 2022b) and Michigan (U.S. DOE, 2022c), are investigating data management approaches to consolidate information for performance reporting. While these initiatives are specific to core WIOA programs, many of the programs and partners resemble the organization of Washington's workforce service partners.

## General Statewide Data Hubs

Several states have established robust longitudinal data repositories spanning multiple substantive areas. Rhode Island's Data Ecosystem, Colorado's Linked Information Network, and Wisconsin's Administrative Data Core encapsulate data across a multitude of domains. Wisconsin's Administrative Data Core encapsulates information across Department of Health Services, Department of Children and Families, Department of Workforce Development, Department of Corrections, Milwaukee County Sheriff's office, court records, Department of Public Instruction, and the Homeless Management Information System (IRP, n.d.). Colorado's Linked Information Network captures data across housing, health, child welfare,

early childhood, education, juvenile justice, adult justice, employment, and public assistance (CO OIT, 2019). Rhode Island’s Data Ecosystem, housed in the Department of Health and Human Services, covers Medicaid and other claims data; human service programs like TANF, SNAP, CCAP, and SSI; job training, wages, and income insurance from the Department of Labor and Training; child health screening, referrals, and immunization, birth and death records; homelessness data; Covid information; developmental disabilities case management; and court data (RI HHS, 2024).

Massachusetts is carrying out a unique approach. Unlike other state efforts, which are to coordinate and manage a longitudinal data repository, the state has established a data sharing framework and statewide memorandum of understanding (MOU). In this case, all Secretariats across the state’s agencies participate in an MOU that governs data sharing between agencies. The Executive Office of Technology Services and Security (ETOSS) will provide support in cross-agency data sharing, which is accomplished through a data use agreement (DUA). Previously, the state had over 287 unique data sharing agreements requiring, on average, 133 days to create. There is no fee for this support but is centralized because navigating rules and regulations surrounding data sharing is complex and ensures interagency data sharing is done in a cost-effective and replicable manner. ETOSS will provide data platforms or websites, integrated data systems, data matching, and data science/analytics, or machine learning as services (EOTSS, 2019).

### System Integration for Service Delivery

Much of the observed efforts nationally predominantly focus on longitudinal data systems. While there are not many examples of integrated systems for service delivery, a number of states are actively pursuing such systems. Illinois and Oregon are two of the integration efforts that are seeking data sharing within state workforce systems.

State	Status	Coordinated Intake	Universal ID	Data Warehouse	Eligibility Determination	Structure
CT P20 WIN	Exploring	x	x	x		TBD
IL WIOA	Exploring	x	x	x	X	Federated
FL REACH	Developing	x	x	x	X	Federated
OR WIOA	Established	x	x*	x	X	Federated
WA HHS Coalition	Established	x	x	x	X	Federated

\* Inclusion of Universal ID is presumed, given the scope of coordinated intake described in the project.

Additional efforts outside WIOA towards operational data sharing are also underway. CT’s P20 WIN, while it does not have real-time processing of data, indicated that there was a desire to expand P20W for service delivery and case management and are reevaluating their current procedures to expand functionality and utility of the P20W system (Breslin, 2023).

A parallel and similar proposed approach to the Washington Workforce Board’s data integration proposal is seen through Florida’s Reimagining Education and Career Help (REACH) Act of 2021. This is a statewide, system-wide approach to workforce development and education, where employment and

economic opportunities are supported and enabled across the state. This effort is coordinated by FloridaCommerce and partners with the REACH Office, Department of Children and Families, Department of Education, Florida Digital service, and CareerSource Florida. Like the goals of Washington’s Workforce Board, the initiative will encompass a hybrid approach to a coordinated intake process, supporting a “no wrong door” approach to service delivery. Work under the REACH Act will be housed in a customer portal, which will enable a single shared account and a common location to access, locate, or submit applications for customers. A data hub will also be built, which will enable the sharing of data between agencies to support user experience as well as data analytics. Expectedly, the resources to support this effort are notably higher than the resources expended for static, longitudinal data systems. The REACH Act will allocate a total of \$250 million in spending across five years, with work beginning in the 2021-2022 fiscal year and concluding in the 2026-2027 fiscal year (FloridaCommerce, n.d.).

A comparable effort occurring in the State of Washington is the multi-agency effort under the Health & Human Services Coalition (HHS Coalition). The HHS Coalition was established in 2018 and was a joint, inter-agency effort fueled by the need for increased collaboration of IT efforts to better serve and improve the health and well-being of constituents in Washington. The coalition’s vision includes removing barriers to benefit access, carrying out effective program operations, improving service coordination, and being good stewards of public dollars. The Coalition includes five state health and human services agencies: Department of Children, Youth and Families (DCYF), Department of Health (DOH), Department of Social and Health Services (DSHS), Health Benefit Exchange (HBE), and the Health Care Authority (HCA, 2022). The coalition includes nine initiatives either active or planned. The brief descriptions of the projects most closely related to the workforce data integration efforts are pulled directly from HCA’s program resources (HCA, n.d.):

- Integrated Eligibility & Enrollment (IEE): Streamlines a person’s application and enrollment to help them navigate the 75+ health and human services for which they may be eligible.
- Master Person Index (MPI): Creates a unique identifier for every person, improving consistency and coordination of care across systems and programs.
- Community Information Exchange (CIE): Captures and manages personal data across social service organizations so providers have a more complete picture of a person’s individual health care needs.
- Electronic Consent Management (ECM): Facilitates the exchange of a person’s health data between authorized providers by capturing and storing consent to share sensitive information.
- Integration/Interoperability Layer: Serves as the glue that binds the system together, seamlessly exchanging data so that systems function as a single entity.

These models and early adoption of integrated systems provide a preview of shared problem spaces and a means to learn through their implementation strategy.

## Differences

The longitudinal data systems described above address a slightly different need than the Workforce Board’s data integration project. Therefore, design and implementation, while in many ways drawing from common procedures and technology, differ in notable ways. These differences and the specialized needs of the workforce system’s operational data sharing are summarized below.



Process	Analytical Data System	System Integration for Service Delivery
Data Governance Council	✓	✓
MOU/DUA	✓	✓
Data Transfer Frequency	Low	High
Matching/Unique Identifier	✓	✓
De-identification	✓	--
Centralized or Federated	Both	Both
Cost	\$\$	\$\$\$

One of the distinct differences between the needs of the Workforce Board’s data integration efforts and building a data system to gather and house longitudinal data is the cadence in which information needs to be coalesced among data systems or sources. For longitudinal data, data can be captured in a scheduled cadence and will not necessitate complex systems to support live or frequent data integration. For example, CT P20WIN and WI’s Administrative Core Data will gather and update data bi-annually or annually. Technology to securely collect data from partnering agencies can include a secure file transfer protocol (Breslin, 2023). For service delivery data integration, a daily or “live” data repository will be needed.

Another notable difference is in the de-identification process between analytic data systems and system integration for service delivery. Effectively all the longitudinal data systems referenced will carry out a de-identification step following record matching. In many cases, longitudinal data system administrators will not even see or have access to program data. In CT’s P20WIN system, participating agencies will share personally identifiable data. The Department of Labor, as a partner agency, will carry out the matching and generate a crosswalk of unique IDs. The original PII is destroyed following each year’s data match, and the crosswalk is used to link data across agencies’ analytic files—which is retained with the original agency (Breslin, 2023). The Arkansas Research Center has a dual-database architecture system, in which identity data is separated from program data and goes through two de-identification steps (Arkansas Research Center, n.d.). Both Nevada and Virginia retain program data behind the “firewalls” of the data-owning agency (Nevada Office of Workforce Innovation, n.d.), with the latter also implementing a double-deidentifying process (VLDS, 2021). Rhode Island simply restricts access to PII and their matching logic to a small technical team overseeing the RI Data Ecosystem (RI HHS, 2024).

Some processes are comparable between analytic and operational data sharing efforts, such as the step of matching and reconciling unique records. States have pursued one of two different approaches: build versus buy. Washington’s Health Care Authority (HCA) has pursued a solution through a third-party vendor to conduct their single identifier solution. Connecticut’s P20WIN program uses a software called Data Ladder to conduct matching (Breslin, 2023). ERDC’s P20W data system also utilized a software package for identifier solution; however, it was noted that extensive modifications were made to meet



the needs of the organization (Nelson & Weaver-Randall, 2023). Other states, conversely, developed in-house solutions, like Wisconsin's Administrative Core Data (Frederick, 2023).

Establishing a data governance body, including attendant documentation like memorandum of understandings (MOUs) and data-use agreements (DUAs) were widely observed and not unique to either an analytical data system versus a system integration for service delivery approach (Emans, Finnegan, & Russell, 2023). A notable role of data governance bodies includes serving as the decision-making body for data utilization. Oregon Department of Human Services has established the Integrated Client Services, which established a longitudinal data set that can be used for legislative requests, program improvements, improved data sharing, and a holistic view of Oregonians (AISP, 2005). The data governance process also specifies that entities in which data originated (whether agencies or programs) ultimately determine use of their data through ICS. Approval from data sources is needed prior to completing a data use request (Oregon Department of Human Services, n.d.). CT P20WIN (State of Connecticut, 2022) Virginia Longitudinal Data System (VLDS, 2021) follow similar governance structures, whereby data requests are reviewed on a case-by-case basis and must be explicitly approved by relevant data-owning agencies or entities. Rhode Island's Integrated Health & Human Services Data Ecosystem effort additionally uses their governance board, composed on data-contributing providers and key stakeholders like the Governor's Office, legal, and IT department, to ensure alignment with state priorities, recommend projects, and propose use of resources (RI HHS, 2023).

## Resources

The investment needed to make data integration systems, even for historical longitudinal data, is non-negligible. As Iowa noted in their state WIOA plans, they are pursuing consolidated or federated data systems to integrate across their WIOA programs but "is doing so in a manner that appreciates the complexity of the task at hand" ( U.S. DOE, 2022b). For cases when the staffing and financial investments for the initiatives described above are known and publicly released, it is provided below.

- Arkansas Research Center (Arkansas Research Center, n.d.)
  - Funding: <\$6 million
  - Staffing: 5
  - Timeline for initial infrastructure: 4 years
- California Cradle-to-Career (C2C, 2022)
  - Funding: \$18.5 million
  - Staffing: Though not specified, the LinkedIn page for California Cradle-to-Career Data System page indicates a company size of 11-50 employees and had 24 associated members (California Cradle-to-Career Data System, 2024).
  - Timeline: 18-month planning, 5-year implementation
- Florida REACH ACT (FloridaCommerce, n.d.)
  - Funding: \$250 million
  - Staffing: (not specified)

- Timeline: initial 5-year plan
- Kansas DOE: The Whole Child (NCES, 2023)
  - Funding: \$3,148,241
  - Staffing: (not specified)
  - Timeline: 4 years
- Kentucky’s KYStats (KYSTATS, n.d.; KYSTATS, 2019)
  - Funding: initial \$6 million (with additional funding for expansion)
  - Staffing: (not specified)
  - Timeline: 4 years (with additional years for expansion)
- Washington’s Health & Human Services Coalition (HCA, 2022)
  - Funding: \$39,965,840<sup>4</sup>
  - Staffing: (not specified)
  - Timeline: 2021-2027<sup>5</sup>

Many states noted high investment from other state entities that significantly reduced the startup costs of implementing a new technology solution in-house. Connecticut’s P20WIN leverages the Department of Labor to retrieve, match, and produce analytical files for the P20WIN system (Breslin, 2023). Illinois WIOA programs maintain their own respective agency data. However, interoperability and data sharing between agencies are maintained by the Department of Innovation and Technology (DoIT), which was created in 2016 to carry out the information technology functions of all agencies under the jurisdiction of the Governor, such as governance, data identification, security, ownership, quality, and data sharing. DoIT is developing ILDS 2.0 to integrate employment, education, human services, and early childhood data into a data repository (U.S. DOE, 2020a). Louisiana’s UI data is housed in a state-managed mainframe system (U.S. DOE, 2020b), and Wisconsin taps into resources at the Social Science Computing Cooperative (SSCC) at the University of Wisconsin-Madison for servers and other technology supports (Frederick, 2023). These established supports provide instrumental acceleration of constructing a new data system. However, as Washington’s workforce state agencies are largely decentralized from a technology standpoint, these supports will not likely be available for the Workforce Board’s data integration pursuits.

### Alignment with Existing State Workforce Projects

A cursory glance at the data integration efforts involving Washington’s workforce service agencies may appear as if there is a lack of alignment or duplication of effort. Multiple statewide efforts to integrate data can be observed in other states, like Oregon’s Statewide Longitudinal Data System, Integrated Client Services, or integrated WIOA data efforts. However, in the case of integrated workforce data in

---

<sup>4</sup> This amount is based on the reported total planned spend of active and planned enterprise-wide and enhanced collaboration projects.

<sup>5</sup> The IT strategy for the HHS Coalition began in 2021; the final year of the proposed enterprise-wide and enhanced collaboration projects is FY 2027.

Washington, this effort will not only combine siloed efforts but further enhance existing data integration projects.

There are two existing longitudinal data initiatives that integrate workforce data in the state of Washington. The first is ERDC's P20W longitudinal data effort, which captures data from SBCTC, L&I's apprenticeship program, OSPI's Secondary Career and Technical Education program, and UI wage data from ESD. Separately, DSHS has developed an integrated client database for the agency's customer base, which also captures ESD's UI wage data, Economic Services Administration's TANF program, and Division of Vocational Rehabilitation's efforts—including vocational assessment, services, education/training, and other case management information.

There is limited overlap in data between these two efforts. But a notable share of information that represents workforce development efforts in the state is also missing; program data for WIOA (including ESD's Title I and III; DVR and DSB's IV), the Trade Adjustment Assistance, Training Benefits, and the Workforce Board's data on Private Career Schools is not represented. There is no statewide, consolidated data to represent the full space of workforce-related efforts in the state. Any statewide evaluation of the workforce system is done on an as-needed basis, with catered data requests and integration procedures. It is manual and laborious and often deters regular and systematic evaluation of the complete workforce system in the state.

Additionally, the two existing efforts between ERDC and DSHS are intended to be for analytical purposes. The intention is to build a comprehensive longitudinal data set to inform program evaluation, reporting, and other analyses. Therefore, benefits to service delivery through shared data, like accelerated intake or identify service gaps, cannot be gleaned from these existing resources—which were designed for a different purpose.

There past initiative, led by the Workforce Board, to integrate across the state workforce system. The Workforce Board pursued National Governors Association's Workforce Innovation Network (NGA WIN) grant funding in 2021 towards:

“Identifying and planning for the use of a common metric for family-sustaining wage goals for jobseekers across workforce and economic development, social services, and community and technical colleges... The support and technical assistance offered by this opportunity will help project partners fully explore options for a common system of measuring the impact of our programs on all populations, based on a standard calculation of ‘self-sufficiency.’ This, in turn, will enable us to dashboard and identify gaps and shortfalls in service delivery, both geographically and by population group. The richness and granularity of information will allow collective impact partners to ‘swarm’ around specific problems to implement solutions that improve participants’ economic outcomes.”

Two tools were produced during the duration of the grant, including a questionnaire tool to facilitate a discussion of customer strengths and support the planning process with customers. The second was a self-sufficiency matrix assessment tool, whereby the jobseeker reported on their self-sufficiency status across a multitude of life domains to support case managers in identifying strengths and asset, identify needs for service planning, and continue documentation of the customer's progress towards self-sufficiency.

Lastly, DSHS prioritized a case management project for community services, like BFET and WorkFirst. It is housed in DSHS' eJAS system and launched in 2021. It provided a tool for engaging clients into the workforce system and leverages real-time data from partners to ensure that case managers have the necessary information available in serving customers. Partner agency data is captured in this system, including from the Department of Commerce, SBCTC, ESD, and the Office of Refugee and Immigrant Assistance. Data from partners might get imported as overnight batches as well as having partners directly enter information into the system. This system enables partners to see the same data, though sensitive information is hidden for partner users to align with regulatory requirements. This represents a case of operational data sharing, though the population of customers represented in the database serves those participating in an ESA workforce program. The intention is to meet similar programmatic requirements and provide functionality to the full state workforce system.

The purpose of the Workforce Board's integrated data system is to not only provide the first comprehensive data repository of workforce-related program data across the state but to also provide the first systemwide data sharing at the time of intake and service delivery to improve processes and customer experience. The Workforce Board's integrated data system serves a unique need but also holds strong alignment to the existing and needed efforts occurring through partner agencies. A key deliverable of this initiative is to generate a continuously updated and consolidated data repository for workforce data. As a partner of this effort, future reach of this work could include expanded collaboration with ERDC as a recipient of data through this integrated data system, to supplement the existing workforce data reflected in the P20W data. The alignment of this initiative to existing efforts across partner agencies further supports the essential need and purpose of building an integrated workforce data system for Washington.

## Summary

Washington has a strong history as a leader in workforce data integration efforts. ERDC's P20W is only one of five states (across 40 in total) that captures workforce service data, unlike many states that will stop at integration of wage information. However, states are moving towards more data integration and modernization efforts. Several states are actively building or investigating consolidated data repositories for data across core WIOA programs to meet federal reporting requirements. Presently, Washington does not have a central database for core WIOA programs, which are housed across DSHS departments (ESA, VR), DSB, ESD, and SBCTC—let alone the full spectrum of workforce-related data to represent the services and outcomes across Washington.

Implementation funding is needed to accomplish a connected state workforce system, a long-standing priority for the Workforce Board. However, funding and resource allocation has been limited and only recently been approved in the last biennium. In the feasibility study stage, a viable solution has been identified. **But without the needed funding to support implementation, Washington will fall behind in making the necessary technological modernization efforts to effectively and efficiently make program enhancements and serve customers.** There are not many instances of data integration towards service delivery, which has added technical challenges not occurring for the development of asynchronous, longitudinal data systems. Washington has an opportunity to be a leader in successful implementation of a federated data system to break down the silos consistently observed in workforce development nationwide and serve as a model and guide for states to similarly modernize and adopt systems improvement.

## Data Governance Council

Standing up of a data governance coalition was a central priority for FY 2024, having been identified as a core recommendation from the 2018 Common Intake and Workforce System Integration Research study. The adopted data governance coalition structure (herein referred to as the Data Governance Council) is modeled after similar efforts undertaken through the State of Washington’s Health & Human Services Coalition technology projects, California’s Cradle-to-Career (C2C) initiative, as well as other state implementation of data governance bodies like through Rhode Island’s Health & Human Services Data Ecosystem, Oregon Health Authority’s Integrated Client Services, or Virginia’s Longitudinal Data System—among others (Tuscher, 2022). Responsibilities include:

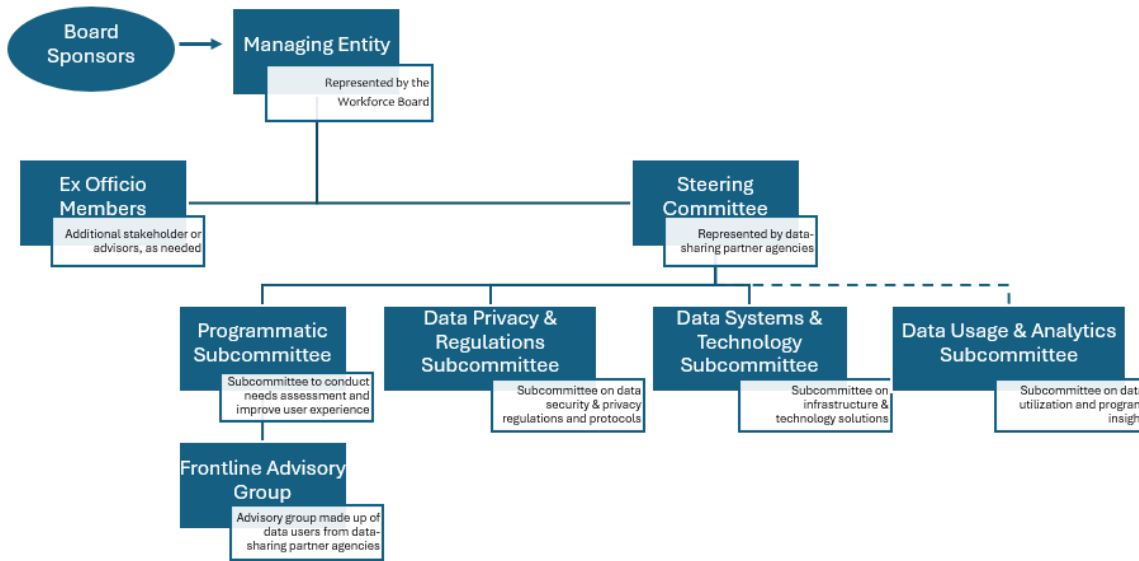
Not all agencies have access to outcome data to carry out program evaluations and, out of necessity, must rely on external parties for aggregated data results. One function of the multi-agency Data Governance Council is to serve as a vehicle for identifying state workforce data needs and facilitating the resourcing and procedures needed to support the collective state workforce system.

- Identify the strategic priorities for the integrated workforce data system.
- Review and provide input on the implementation strategy (including resourcing), prepared with guidance and consultation from the subcommittees, to ensure alignment to the strategic direction of the Data Governance Council.
- Ensure compliance with federal, state, and agency data security and privacy regulations. The Data Governance Council may also function to identify needs for clarity or statutory changes to support systems integration.
- Oversee progress, risk mitigation, and troubleshooting for the project.
- Set the direction of analytics to support and enhance the state workforce system.
- Review and approve of deliverables, including decision packages.
- Establish and revise data governance policies and procedures.
- Provide input on the membership, structure, and procedures for the council.

### Structure

The function of the Data Governance Council is to establish priorities, initiatives, resourcing needs, and oversight pertaining to cross-organizational information technology projects. Figure 4 overviews the organizational structure of the Data Governance Council.

Figure 4 Workforce Data Governance Council



The Data Governance Council includes the managing entity and the steering committee. The Board Sponsors will include representation from the Workforce Board members, to ensure alignment with the Workforce Board priorities and direction. The Workforce Board staff will serve as the managing entity, acting as convener for the Data Governance Council and securing resources attendant priorities and initiatives identified. It will, alongside the Data Governance Council, advocate and foster the work of the workforce data system with other state agencies, Legislature, Governor, and public. Additionally, each data-contributing agency would appoint a representative to the Data Governance Council Steering Committee. This may be an agency head or a delegate who has been granted decision-making authority in lieu.

Domain-specific subcommittees will also be represented by data-contributing agency. These will include a programmatic, data privacy, data technology, and analytics focus and support the Steering Committee in making vetted and informed decisions regarding the data integration project. The organizational structure may be reviewed and revised, as needed, or additional groups created to adaptively and effectively meet the needs of the data integration project. Refer to Appendix B for additional details on each of the Data Governance Council entities.

## Data Regulations

The Workforce Board is mandated to oversee and address the coordination and efficacy across the workforce development system. These mandates include the effective integration of technology and data systems to improve service delivery and program impact which guided the intent and scope of this data integration effort. The Workforce Board's responsibilities include:

- Executive Order 99-02: The Workforce Training & Education Coordinating Board will act as the Workforce Investment Board for the purposes of the federal Workforce Investment Act of 1998. As specified in P.L. 105-220 of WIA, the Workforce Board is tasked with establishing a “state unified plan... to simplify [universal access to employment and training programs] so that state employment and training customers can better obtain these services.” Among these prerogatives includes assessment of the state’s workforce system, establishing goals and strategies for improving the workforce system, a description of the performance management system for the workforce system, and addressing any pertinent challenges identified.
- RCW 28C.18.110: The Board, in collaboration with operating agencies, will identify policies to minimize administrative barriers, improve operational efficiency, and enhance coordination across the workforce development system. This may include sharing of resources as well as recommendations for waivers or statutory changes as needed.
- RCW 28C.18.060: The Board is tasked with establishing a “consistent and reliable” database of vocational education enrollments, costs, program activities, and job placements from publicly funded vocational education programs in the state.
- WIOA 101(d)(8): Federal requirements task the state workforce board with technology and data systems integration towards improved service delivery and reporting on performance and accountability measures.

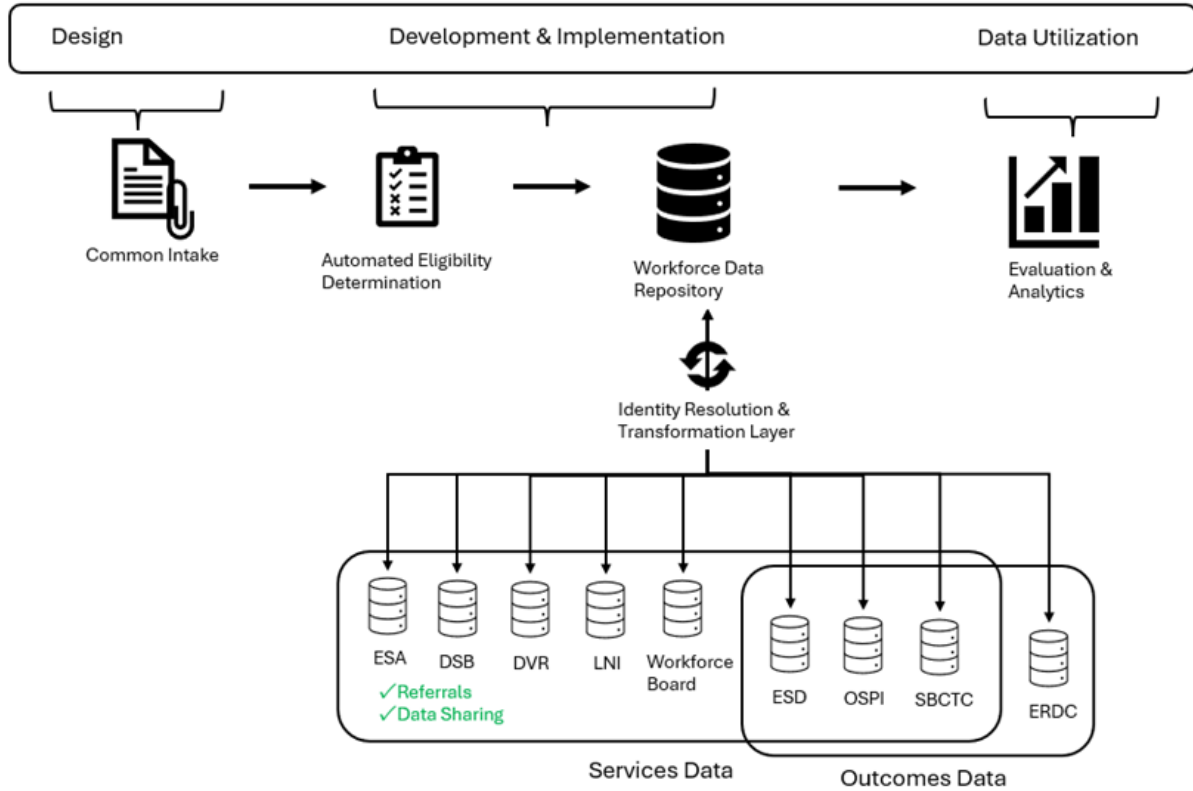
There are noted challenges in meeting some reporting requirements, such as co-enrollment metrics for federal reporting. Technology initiatives like developing a universal workforce ID and linking service data between agencies and programs would support ongoing reporting and evaluation requirements.

Acting upon the mandates above requires careful and comprehensive consideration of regulations governing programs and the handling and use of data. This includes regulations and legislation on data governance, technology, security, privacy, and permissible uses—like evaluation. Each of these sections will be described, specifying the regulations governing each. Refer to Appendix C for relevant regulations guiding the data integration initiative.

## Project Plan

The decision making and oversight of the data integration project will be multi-agency at all levels and be represented through the Data Governance Council. The initial planning phase of the data integration project is ongoing (Phase I) and development of an integrated portfolio of technology projects will continue into Phase II and Phase III. These major investments are summarized below.

## Data Governance Council



### Phase I

#### 2023-2025 Summary

- Programmatic, regulatory, and technical feasibility study
- Data governance
- MOU/DSA templates, guided by agency, state, and federal regulations
- Pilot through WaTech's Innovation & Modernization Program

The agency's strategic plan prioritizes the unification of workforce service delivery, including efficient transfer of data across workforce organizations for supporting shared clients and enabling shared measures. The funding for this phase, under Section 614 of the 2023 state operating budget, provided for "a full-time information technology (IT) position to collaborate with other state workforce agencies to establish and support a governance structure that provides strategic direction on cross-organizational information technology projects." Efforts during the first year included coordination of a cross-agency working group to facilitate agreement with agency partners on the planning, design, and implementation of data sharing, integration methods, and technology solutions. Discussions with the working group followed along the timeline below and serve as discovery for programmatic, regulatory, and technical feasibility.



Q0 (Aug-Sept '23) Planning	Q1 (Oct-Dec '23) Framework	Q2 (Jan-Mar '24) Technology	Q3 (Apr-Jun '24) Implementation	Q4 (Jul-Sep '24) Documentation
<ul style="list-style-type: none"> <li>• Establish working group of coalition partners</li> </ul>	<ul style="list-style-type: none"> <li>• Establish agreement on the goals, functionality, and key features of data integration project</li> <li>• Data governance body</li> </ul>	<ul style="list-style-type: none"> <li>• Determine technology solution</li> <li>• Compatibility with existing systems</li> <li>• Location and technology support for data warehouse</li> </ul>	<ul style="list-style-type: none"> <li>• Fine-tuning technological, security, regulatory, and financial specifications for implementation</li> </ul>	<ul style="list-style-type: none"> <li>• Finalizing documentation, culminating in a feasibility study report and a decision package for budgetary consideration</li> </ul>

The Workforce Board also formalized the Data Governance Council to accompany the data and technology integration efforts needed to address the ongoing system integration priorities for Washington’s workforce system. The continuing work, in collaboration with Data Governance Council members, will seek to identify priorities, gaps, and resourcing needs for information technology projects needed for systems integration.

The culmination of the preceding year is aiming towards submitting a funding request for the 2025 legislative session. Phase I will shift from discovery to implementation, where deliverables like a memorandum of understanding, modified data-sharing agreements, and adjusted consent language among core data-owning partners will be a primary focus leading into Phase II. Additional priorities, through WaTech’s Innovation and Modernization Program funding for FY 2025, will include piloting of an agile development framework and migration to a cloud solution to prepare for the next phased work, as set forth by the 2025 Legislative Session decision package.

### Phase II

<p>2025-2027 Summary</p> <ul style="list-style-type: none"> <li>• Data repository</li> <li>• Identity resolution algorithm</li> <li>• Analytics engine</li> </ul>
---

The second phase of the project encompasses data system connectivity and access and will be encompassed in a decision package request for the upcoming biennium. The focus of Phase II is to provide the platform in which to consolidate and exchange data across the workforce partners. Data governance oversight will initiate the process through a formalized Memorandum of Understanding. This document will outline the scope of the data integration project and outline the expectations and responsibilities of the Data Governance Council as an oversight body as well as data-sharing partners. The signatories will also participate in a data-sharing agreement. This agreement will align to the data sharing policies and regulations, including the use and secure management of said data. The data sharing agreement will undergo legal review to ensure compliance with applicable regulations. Additional documentation supporting data governance will also entail common participant consent language for inclusion at intake; this will ensure an opportunity for participants to actively participate in data sharing for service delivery—or to opt out. Technology development projects in Phase II are three-fold.

**Data Repository:** The first is to establish a data warehouse in which to store and link data across the data-providing agencies. This will serve as the central repository for workforce development data necessary to accomplish a statewide workforce data integration. The selection of the infrastructure as a service (IaaS) will be selected among cloud platforms being supported through WaTech and in alignment with the cloud solutions available under statewide contracts.

**Identity Resolution Algorithm:** The second technology is identity resolution software. Each data-providing partner agency oversees and maintains their own data or case management system. This means that data is insular and uniquely identifies individuals within their own data system. As data is shared across partner agencies, unique identification of data entities, like jobseekers, is needed in order to make meaning across each of data sources. Identity resolution can be built in-house or through a vetted third-party vendor. The identity resolution software must be compatible with the cloud solution. Efforts have already been established in this arena, including the Master Person Index initiative under the Health and Human Services Coalition.

**Analytics Engine:** The final technology project will involve the development of a data lookup portal. An example of an existing data lookup portal in the state is DSHS' Benefits Verification System, in which approved staff may be able to securely search for participating services for customers. The data lookup portal must be a secure platform, compliant with SAW, that permits authorized users to look up relevant information of shared customers. The data lookup portal enables data-sharing partner agencies to access data without making additional changes to their existing information systems to ingest data. It will be a lighter lift to utilize data and accelerate onboarding for staff to leverage data sharing for service delivery. A key consideration of this data lookup portal is to ensure data privacy and confidentiality. This will include data permissions, configured along multiple dimensions: participant consent to share data, verification of an agency serving said participant, and implementation of permissions (mirroring access of agency systems) of which records are available to which staff members.

### Phase III

#### 2027-2029 Summary

- Coordinated intake application portal
- A secure repository of shareable documentation
- Automated eligibility determinations
- Automated referrals

A third phase of work layers applied technology to the data platform established through Phase II. This phase will target the coordinated intake priorities of the TAP plan. The work will kick off with a discovery phase, determining the business needs and parameters in which data-sharing partners are able to utilize a coordinated intake process for the state's workforce system. The discovery phase will inform implementation strategy and will continue the work under a multi-year 2025 Decision Package request. Phase III will capture three technology projects in support of the coordinated intake process.

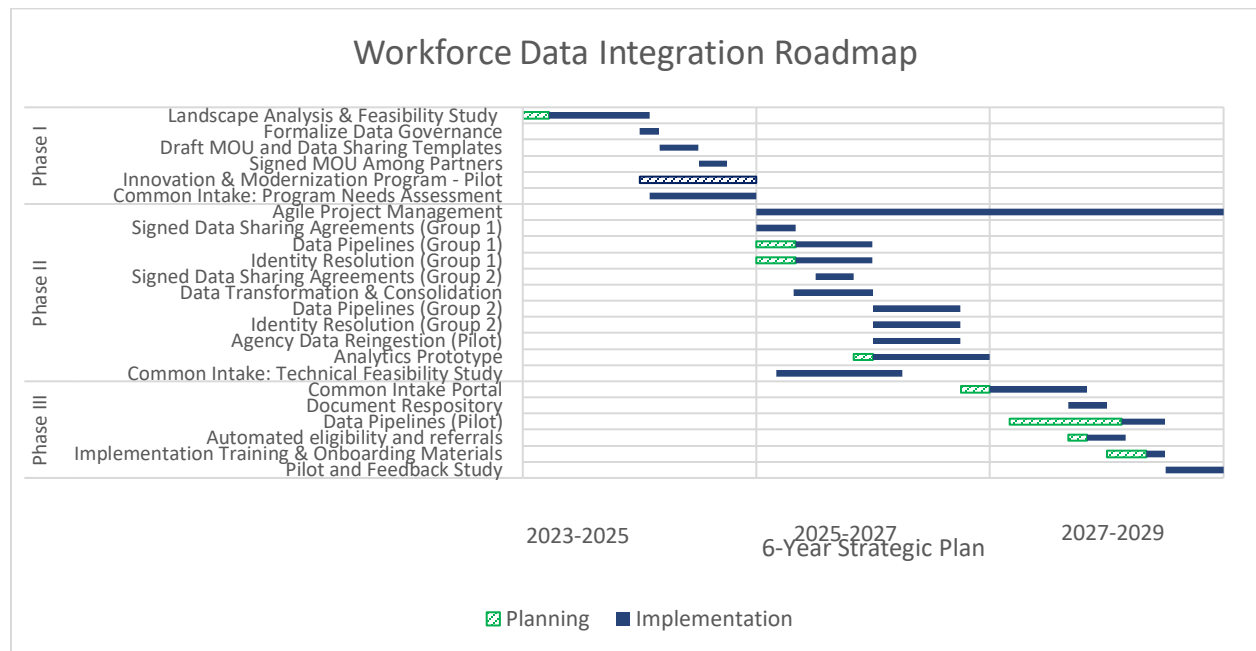
**Coordinated Intake Process:** The coordinated intake process will need to be housed in a centralized application portal. This will be developed under DES' IT Professional Services Contracts and will be custom-built based on the design specifications from the discovery phase. This portal will be publicly available and be the avenue in which jobseekers apply for workforce service programs.

**Sharable Documentation and File Repository:** An expansion of cloud services in Phase III will also establish a document repository. At intake, customers may be asked to provide proof of eligibility, such as paystubs or transcripts. The application through the coordinated intake itself can be captured as both data elements but also a transferable and static document. In the case of static documents, being able to store and transfer documents with the same access and permission settings as data that is transferred amongst workforce partner agencies. Expansion of the cloud solution to extend data storage and access to document storage and access will be priced and built.

**Automated Eligibility and Referrals:** Once the coordinated intake application and data ingestion into a data warehouse is accomplished, models can be overlaid on the data to automate eligibility determinations and referrals. Cloud solutions available through the statewide contracts have applications available for analytics. This includes the generation of “scripts” (or programming language to transform or establish algorithms or models) and the scheduling of “jobs” to run the scripts on an established cadence. This can capture the rules and conditions to determine programmatic eligibility across the workforce programs. This will be provided to the jobseeker to understand which agencies and programs to connect with. The information can also be stored in a partitioned data warehouse for the respective agency to access the referred jobseeker. This will enable not only automated eligibility determinations but to also establish a consistent referral process across the workforce system. It will also ensure jobseekers are connected to all appropriate contacts, prevent service gaps for individuals, and realize the “no wrong door” goal.

### Timeline

A Gantt chart overviews the scaffolding of the three phases of the data integration effort. Each phase includes several major areas of work, including data governance, technology, and change management. The Gantt chart reflects the general timeline across six years, beginning with the 2023-2025 biennium and concluding with the 2027-2029 biennium.



Additional details of milestones and deliverables, corresponding to each item on the roadmap, can be found in Appendix D.

### Resources

The timeline for Phase II and Phase III of the project are aligned to fiscal biennium. Each Phase is planned to correspond to a decision package submission for the 2025-2027 and 2027-2029 biennium, respectively. The estimates below focus on the resources needed for a 4-year implementation plan across Phase II and III, with updated Phase III estimates occurring following a dedicated feasibility study for the coordinated intake process and its downstream processes.

Category	Line Item
<b>Salaries &amp; Benefits</b>	Project Management
	Data Management
	Data Scientist
	Fiscal and Contract Support
	Administrative Support
<b>Contracted Services</b>	Identity Resolution Vendor
	Identity Resolution Validation Study (consulting)
	Project Management Office (consulting)
	• Scrum, change management, and quality assurance
	DES IT developers (contractors)
	WaTech Small Agency Support
<b>Capital Expenditures</b>	Legal Consulting Services
	Infrastructure as a service (IaaS)
<b>Interagency Fund Transfers</b>	Task Management & Code Management Software
	Pass-through costs to partner agencies
<b>Interagency Fund Transfers</b>	WaTech will provide direct support under an “accelerator” model; WaTech will submit a tandem decision package (“Smart Data for Smarter Decisions”) to capture the costs of this accelerator program.

### Risk & Mitigation Strategy

A portfolio of development projects does pose some level of risk. Below is a summary of identified risks and mitigation strategies during the planning and development phases (refer to Appendix E for additional details).

- **Formal Partnerships:** The data integration project has established all data-sharing partnerships within the workforce system. The impact of this work is highly conditional on continued and collective participation. Continuing of a robust Data Governance Council is critical to the success and impact on the workforce system and its jobseekers.
- **Staffing:** Contract and job requisitions are lengthy processes, particularly for technical roles. The timeline is adjusted accordingly to account for appropriate lead-up time to development to ensure timely progress is not impacted.

- Scope: The multiple technology efforts to support an integrated workforce system is intricate. While the work is aligned with the 4-year TAP plan, the work does span several years for development. The distribution of work is intentional, honoring the complexity of the work, strategically sequencing work based on an agile development framework and the inherent dependencies involved in the project.
- Data Privacy Regulations: Navigating the unique set of regulations governing education and workforce data across data-sharing partners is a hurdle in any data-sharing efforts. However, this project is guided by the strictest data security and privacy considerations and has carried out a literature review of agency, state, and federal regulations to inform agreements and build in procedures, like active consent, to ensure model data governance.
- Personnel: This project is precipitating pre-requisite data modernization efforts, such as a migration from on-premises to cloud-based solutions. Staffing up will be a necessary investment to support this new enterprise technology effort.

Despite the risks, a major strength of the Workforce Board has been the core vision of collaboration in supporting the workforce system. While the establishment of a formal Data Governance Council appears new in name, the components have existed in similar forms throughout the work for the Workforce Board and the workforce system. That collaboration will continue and further strengthen through this system integration effort. **The intent is to align between the shared strategic priorities of the Workforce Board and WaTech, continued partnering on a “use case” with support from WaTech to launch this work.** Additional partnerships are being pursued to sync with existing and relevant technologies that are already being built in the state, to streamline effort, and to serve as good stewards of state resources for technology initiatives among agencies. The structures and partnerships are designed to identify and effectively and efficiently resolve risks and blockers in order to successfully realize the mission of the state workforce system and Washington state as a whole.

## Future Work

The discovery phase to understand the programmatic, regulatory, and technical landscape of the partners, state, and peer efforts has enabled a solidification of actionable next steps towards realizing a near decade-long priority for the state workforce system. Discussions with identified subject matter experts from data partner agencies, ranging from programmatic, evaluation, data systems, information technology, and regulatory. A landscape analysis of similar effort nationwide further informed and guided the design and planning for the future of the Washington’s workforce system IT projects.

The culmination of discovery and research will lead to a decision package submission for the 2025 Legislative Session, to begin the first implementation phase of the project. This work is anchored to the strategic priorities of the state workforce system, as specified in the four-year TAP strategic plan for 2024-2028. The scope of the workforce system’s data and systems integration is complex and involves a portfolio of initiatives to fully accomplish the goals set forth by the strategic plan. The establishment of the Data Governance Council ensures partner agency representation and support at all stages and domains of decision making. WaTech has also been an active partner since Fall of 2023 as the data integration project has been identified as one of two “use cases” for WaTech’s Better Data, Better Decisions, Better Government, and Better Washington goal under the state’s enterprise IT strategic plan. Members of WaTech’s Architecture and Innovation division are actively partnering on an initial launch of the data infrastructure for this project and to build out the enterprise platform through FY 2025 funding

from WaTech's competitive Innovation and Modernization Program. Continued collaboration and alignment across partner agencies will continue expanding the vision, fine tune the design, and iterate on the implementation strategy to drive necessary systemic change, address current workforce system challenges, and strengthen the services and support provided to Washingtonians seeking economic security and access.

## References

- AISP. (2005). *AISP Network: Oregon Integrated Client Services*. Retrieved from <https://aisp.upenn.edu/network-site/oregon-ics/>
- AISP. (n.d.). *Integrated Data Systems Map*. Retrieved from <https://aisp.upenn.edu/integrated-data-systems-map/>
- Amazon. (2022, May 25). *Amazon Compute Service Level Agreement*. Retrieved from <https://aws.amazon.com/compute/sla/>
- Arkansas Research Center. (n.d.). *ARC Longitudinal Data System*. Retrieved from <https://www.arkleg.state.ar.us/Home/FTPDocument?path=%2FAsssembly%2FMeeting+Attachments%2F520%2FI14542%2FExhibit+E+AR+Research+Cnt.pdf>
- Breslin, K. (2023, September 9). Outreach and Engagement Coordinator. (K. Goutam, Interviewer)
- C2C. (2022, August 3). *Cradle-to-Career 5-Year Projected Timeline*. Retrieved from <https://acrobat.adobe.com/link/track?uri=urn%3Aaaid%3Ausc%3AUS%3Ab9af4162-c8e6-4354-a101-c759185aea12>
- CAI. (2018). *Common Intake and Workforce Services Integration Research*.
- California Cradle-to-Career Data System. (2024, April 1). *LinkedIn*. Retrieved from <https://www.linkedin.com/company/ca-cradle-to-career/>
- CO OIT. (2019, December). *Linked Information Network of Colorado (LINC)*. Retrieved from <https://coloradolab.org/wp-content/uploads/2019/05/LINC-Data-Initiative-Description.pdf>
- Code of Federal Regulations. (1988, April 11). *What definitions apply to these regulations?* Retrieved from <https://www.ecfr.gov/current/title-34/subtitle-A/part-99/subpart-A/section-99.3>
- Code of Federal Regulations. (2016, August 19). *361.38 Protection, use, and release of personal information*. Retrieved from <https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-361/subpart-B/subject-group-ECFR598a81fff49e46d/section-361.38>
- Code of Federal Regulations. (2016, Aug 19). *603.5 What are the exceptions to the confidentiality requirement?* Retrieved from [https://www.ecfr.gov/current/title-20/chapter-V/part-603/subpart-B/section-603.5#p-603.5\(a\)](https://www.ecfr.gov/current/title-20/chapter-V/part-603/subpart-B/section-603.5#p-603.5(a))
- CT P20W. (n.d.). *P20 Win Data Dictionary*. Retrieved from [https://ctopendata.shinyapps.io/p20\\_win\\_data\\_dictionary/](https://ctopendata.shinyapps.io/p20_win_data_dictionary/)
- DES. (2024). *IT Professional Services (ITPS) Contracts*. Retrieved from <https://des.wa.gov/purchase/how-use-statewide-contracts/it-professional-services-itps-contracts>
- DES. (n.d.). *Contract Summary - Cloud Solutions*. Retrieved from <https://apps.des.wa.gov/DESContracts/Home/ContractSummary/05116>
- DOL. (2023, June 9). *Partnering with Supplemental Nutrition Assistance Program (SNAP) Agencies to Support Able-bodied Adults as the Public Health Emergency Ends*. Retrieved from

- <https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEN/2022/TEN%2028-22/TEN%2028-22%20%28corrected%29.pdf>
- DSHS. (2010, Dec). *DSHS Integrated Client Database*. Retrieved from <https://www.dshs.wa.gov/sites/default/files/rda/reports/research-11-144.pdf>
- ECS. (n.d.). *Statewide Longitudinal Data Systems 2021*. Retrieved from <https://reports.ecs.org/comparisons/statewide-longitudinal-data-systems-2021>
- Emans, T., Finnegan, B., & Russell, J. (2023, September 13). IT & Program Admin. (K. Goutam, Interviewer)
- EOTSS. (2019, July 18). *EOTSS: Data Sharing and Services*. Retrieved from <https://www.mass.gov/doc/jjpad-data-subcommittee-july-18-2019-meeting-presentation-part-2/download>
- ERDC. (2020, Oct). *Washington State P20W Longitudinal Data System Research Handbook*. Retrieved from [https://erdc.wa.gov/sites/default/files/ERDC%20SLDS%20P20W%20Research%20Handbook\\_Oct20.pdf](https://erdc.wa.gov/sites/default/files/ERDC%20SLDS%20P20W%20Research%20Handbook_Oct20.pdf)
- Federal Register. (2021, January 5). *Employment and Training Opportunities in the Supplemental Nutrition Assistance Program*. Retrieved from <https://www.federalregister.gov/documents/2021/01/05/2020-28610/employment-and-training-opportunities-in-the-supplemental-nutrition-assistance-program>
- Florida Jobs. (2021, November 27). *Final report and recommendations: The State of Florida Department of Economic Opportunity DEO Contract Number: C3092 Feasibility Study*. Retrieved from [https://www.floridajobs.org/docs/default-source/division-of-workforce-services/workforce-integration/deo-feasibility-study-phase-4-report.pdf?sfvrsn=cba352b0\\_2](https://www.floridajobs.org/docs/default-source/division-of-workforce-services/workforce-integration/deo-feasibility-study-phase-4-report.pdf?sfvrsn=cba352b0_2)
- FloridaCommerce. (n.d.). *Workforce System Integration FLWINS: Overview*. Retrieved from <https://www.floridajobs.org/office-directory/division-of-workforce-services/initiatives/workforce-system-integration>
- Frederick, C. (2023, August 31). Data Enterprise Coordinator. (K. Goutam, Interviewer)
- Google. (2023, September 8). *Compare AWS and Azure services to Google Cloud*. Retrieved from <https://cloud.google.com/docs/get-started/aws-azure-gcp-service-comparison>
- GOSA. (n.d.). *Data Requests*. Retrieved from <https://gosa.georgia.gov/dashboards-data-report-card/data-requests>
- HCA. (2022, November 1). *HHS Coalition Legislative Report*. Retrieved from <https://www.hca.wa.gov/assets/program/leg-report-hhs-coalition-20221027.pdf>
- HCA. (n.d.). *Health Technology Initiatives in Washington State*. Retrieved from <https://www.hca.wa.gov/assets/program/health-technology-initiatives-fact-sheet.pdf>
- IRP. (n.d.). *The Wisconsin Administrative Data Core (WADC)*. Retrieved from <https://www.irp.wisc.edu/wadc/>



ISBE. (n.d.). *Illinois Longitudinal Data System Project*. Retrieved from <https://www.isbe.net/Pages/Illinois-Longitudinal-Data-System-Project.aspx>

KYSTATS. (2019, March 31). *2015 State Longitudinal Data System Grant*. Retrieved from <https://kystats.ky.gov/Content/Grants/Grant%20Sheet%20-%202015%20State%20Longitudinal%20Data%20System.pdf?v=20230830081258>

KYSTATS. (n.d.). *KYSTATS Grants*. Retrieved from <https://kystats.ky.gov/About/Grants>

LifeTracks. (n.d.). *LifeTracks Data Dictionaries*. Retrieved from <https://lifetracks.ms.gov/pdfs/LifeTracks%20Data%20Dictionaries.pdf>

MA DOE. (n.d.). *Edwin Data Overview*. Retrieved from <https://www.doe.mass.edu/edwin/data-set-overview.docx>

Mehl, A. (2023, August 23). Program Manager. (K. Goutam, Interviewer)

Microsoft. (2024, April 1). *Service Level Agreement for Microsoft Online Services*. Retrieved from [https://wwlpdocumentsearch.blob.core.windows.net/prodv2/OnlineSvcsConsolidatedSLA\(WW\)\(English\)\(April2024\)\(CR\).docx](https://wwlpdocumentsearch.blob.core.windows.net/prodv2/OnlineSvcsConsolidatedSLA(WW)(English)(April2024)(CR).docx)

MLDS. (n.d.). *Data Inventory*. Retrieved from <https://mldscenter.maryland.gov/datainventory.html#WorkforceData>

Moneer, B., Lindekugel, S., Travis, P., & Stevens, M. (2023, October 16). Washington State Cloud. (K. Goutam, Interviewer)

NCES. (2023). *Grantee State - Kansas*. Retrieved from <https://nces.ed.gov/programs/slids/state.asp?stateabbr=KS>

NCES. (n.d.). *Arkansas Workforce Data Quality Initiative*. Retrieved from <https://nces.ed.gov/programs/slids/pdf/ArkansasWDQI.pdf>

NCOSEA. (2020, June). *State Education Agency Data Sharing and the Family Educational Rights and Privacy Act*. Retrieved from [https://nasbe.nyc3.digitaloceanspaces.com/2020/11/NCOSEA-FERPA\\_Final-Paper-2020.pdf](https://nasbe.nyc3.digitaloceanspaces.com/2020/11/NCOSEA-FERPA_Final-Paper-2020.pdf)

Nelson, B., & Weaver-Randall, K. (2023, September 5). Data Governance & Research Staff. (K. Goutam, Interviewer)

Nevada Office of Workforce Innovation. (n.d.). *About the Nevada P-20 to Workforce Research Data System*. Retrieved from <https://npwr.nv.gov/about>

NPWR. (n.d.). *Data Dictionary and Selection Tool*. Retrieved from <https://mynpwr.nv.gov/NPWR/DataDictionary>

NSWERS. (n.d.). *The NSWERS Data System*. Retrieved from <https://nswers.org/insights/data-system/>

OLDC. (n.d.). *Oregon Longitudinal Data Collaborative*. Retrieved from <https://www.oregon.gov/highered/research/Pages/OLDC.aspx>

- OR DHS. (2022, Nov). *Oregon Integrated Client Services*. Retrieved from <https://www.oregon.gov/odhs/data/ofra/ics-overview-diagram-acronyms.pdf>
- Oregon Department of Human Services. (n.d.). *Integrated Client Services (ICS)*. Retrieved from <https://www.oregon.gov/odhs/data/Pages/ics.aspx>
- OSU. (n.d.). *Ohio Longitudinal Data Archive - Data Summary*. Retrieved from <https://chrr.osu.edu/ohio-longitudinal-data-archive/data-summary>
- RI HHS. (2023, May 26). *Data Governance Structure*. Retrieved from <https://eohhs.ri.gov/initiatives/data-ecosystem/data-governance-structure>
- RI HHS. (2024, January 4). *About the Ecosystem*. Retrieved from <https://eohhs.ri.gov/initiatives/data-ecosystem>
- Ross, B. (2023, August 23). Lead Research Analyst Staff Assistant. (K. Goutam, Interviewer)
- Sanjay, T. (2023, June 19). *Cloud Market Share; Who's Winning and Who's Losing?* Retrieved from <https://www.linkedin.com/pulse/cloud-market-share-whos-winning-losing-sanjay-t-s/>
- SLEDS. (n.d.). *About Minnesota SLEDS*. Retrieved from <https://sleds.mn.gov/>
- State of Connecticut. (2022, November 29). *What Data Fields are in P20 WIN?* Retrieved from [https://portal.ct.gov/datapolicy/knowledge-base/articles/data-fields?language=en\\_US](https://portal.ct.gov/datapolicy/knowledge-base/articles/data-fields?language=en_US)
- TICAS. (2021, May). *Fact Sheet - CA's Cradle-to-Career Data System: The Power of Data to Inform Policy*. Retrieved from [https://ticas.org/wp-content/uploads/2021/05/Fact-Sheet-\\_CA-Cradle-to-Career-Data-System-The-Power-of-Data-to-Inform-Policy.pdf](https://ticas.org/wp-content/uploads/2021/05/Fact-Sheet-_CA-Cradle-to-Career-Data-System-The-Power-of-Data-to-Inform-Policy.pdf)
- Tuscher, M. (2022). *Proposed Workforce System Partners Governance Structure*.
- U.S. Department of Education. (2023, October 13). *WIOA State Plan Guidance for Program Years 2024-2027*. Retrieved from <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/octae-program-memo-24-2.pdf>
- U.S. DOE. (n.d.). Retrieved from Joint Guidance on Data Matching to Faciliate WIOA Performance Reporting and Evaluation: [https://rsa.ed.gov/sites/default/files/subregulatory/final-ferpa-tegl-report\\_0.pdf](https://rsa.ed.gov/sites/default/files/subregulatory/final-ferpa-tegl-report_0.pdf)
- U.S. DOE. (2020a). *Illinois PYs 2020-2023 WIOA State Plan Common Elements*. Retrieved from <https://wioaplans.ed.gov/node/19021>
- U.S. DOE. (2020b). *Louisiana PY 2020-2023 WIOA State Plan Common Elements*. Retrieved from <https://wioaplans.ed.gov/node/13171>
- U.S. DOE. (2022a). *Idaho PYs 2022-2023 (Mod) WIOA State Plan Common Elements*. Retrieved from <https://wioaplans.ed.gov/node/343281>
- U.S. DOE. (2022b). *Iowa PYs 2022-2023 (Mod) WIOA State Plan Common Elements*. Retrieved from <https://wioaplans.ed.gov/node/348711>

- U.S. DOE. (2022c). *Michigan PYS 2022-2023 (Mod) WIOA State Plan Common Elements*. Retrieved from <https://wioaplans.ed.gov/node/348746>
- U.S. DOE. (2022d). *Oregon PYS 2022-2023 (Mod) WIOA State Plan Common Elements*. Retrieved from [https://wioaplans.ed.gov/node/12296#:~:text=Statewide%20integration%20of%20data%20capture,of%20Education%20\(RSA\)%20quarterly](https://wioaplans.ed.gov/node/12296#:~:text=Statewide%20integration%20of%20data%20capture,of%20Education%20(RSA)%20quarterly).
- U.S. DOL. (2012, June 28). Retrieved from Advisory: Training and Employment Guidance Letter No. 39-11: [https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2012/TEGL\\_39\\_11\\_Acc.pdf](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2012/TEGL_39_11_Acc.pdf)
- U.S. DOL. (2020). *Attachment II: Source Documentation for Core/Non-Core Programs DOL-only Data Element Validation*. Retrieved from [https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2020/TEGL\\_23-19\\_Attachment\\_2.pdf](https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2020/TEGL_23-19_Attachment_2.pdf)
- UDRC. (n.d.). *Data Dictionary*. Retrieved from <https://udrc.ushe.edu/data-dictionary.html#dws>
- USDA. (2016, March 14). *SNAP Employment and Training WIOA Unified and Combined State Plan*. Retrieved from <https://www.fns.usda.gov/snap/employment-and-training-wioa-unified-and-combined-state-plans>
- Vidyanti, I. (2023, October 30). Chief Data Officer. (K. Goutam, Interviewer)
- VLDS. (2021, Feb 3). *Book of Data Governance*. Retrieved from <https://vlds.virginia.gov/media/Pdfs/BookOfDataGovernance.pdf>
- VLDS. (n.d.). *myVLDS Data Dictionary*. Retrieved from <https://myvlds.virginia.gov/VLDS/DataDictionary>
- WA Governor's Office. (n.d.). *Executive Order 99-02: Workforce Development*. Retrieved from [https://governor.wa.gov/sites/default/files/exe\\_order/eo\\_99-02.pdf](https://governor.wa.gov/sites/default/files/exe_order/eo_99-02.pdf)
- WA State Legislature. (2021). Retrieved from RCW 39.26.125: <https://app.leg.wa.gov/rcw/default.aspx?cite=39.26.125>
- WA State Legislature. (2023). *Personal Information*. Retrieved from <https://app.leg.wa.gov/RCW/default.aspx?cite=42.56.230>
- WA State Legislature. (n.d.). *RCW 28C.18.110*. Retrieved from <https://app.leg.wa.gov/RCW/default.aspx?cite=28C.18.110>
- WaTech. (2022, December 5). *Washington State Cloud*. Retrieved from <https://watech.wa.gov/sites/default/files/2023-11/washington-state-cloud-action-plan.pdf>
- WaTech. (2023, February 7). *Enterprise Architecture Action Plan*. Retrieved from <https://watech.wa.gov/sites/default/files/2023-11/enterprise-architecture-action-plan.pdf>
- WaTech. (2023, April 10). *Enterprise Cloud Computing Action Plan*. Retrieved from <https://watech.wa.gov/sites/default/files/2023-11/enterprise-cloud-computing-action-plan.pdf>
- WaTech. (2023, August). *Enterprise IT Strategic Plan 2023-2025*. Retrieved from <https://watech.wa.gov/sites/default/files/2023-09/Enterprise%20strategic%20IT-8.23.pdf>

WestEd. (n.d.). *Are you re-envisioning your state's longitudinal data system?* Retrieved from <https://statedata.wested.org/>

WI DWD. (n.d.). *WDIS Data Dashboards*. Retrieved from <https://dwd.wisconsin.gov/wdis/dashboards.htm>

Wolf Careers, Inc. (2023, May 3). *AWS vs Azure in 2023 - Comparing the Cloud Computing Glants*. Retrieved from <https://www.linkedin.com/pulse/aws-vs-azure-2023-comparing-cloud-computing-giants-wolfcareers/>

## Appendix A- State Comparison of Workforce Data Integration

State	System Name	Workforce Data Included	Data System	Purpose	Source
AK	Alaska Education and Workforce Outcomes Data System	Workforce (data dictionary not publicly available)	Centralized	Analysis	(ECS, n.d.)
AR	Arkansas Research Center	(In Progress) UI/Wage, SNAP, TANF, and data from the Career and Technical Education Department	Federated	Analysis	(AISP, n.d.); (ECS, n.d.); (NCES, n.d.)
CA	Cradle-to-Career	(In Progress) Workforce integration planned	Federated	Analysis	(TICAS, 2021)
CO	Linked Information Network	Workforce training programs, employment and wages	Centralized	Analysis	(AISP, n.d.); (CO OIT, 2019)
CT	P20Win	Location, date, types, and cost of training/services; employment barriers, basic skills status; last date of contact; UI/wage, etc.	Federated	Analysis	(AISP, n.d.); (ECS, n.d.); (CT P20W, n.d.)
FL	REACH Act	(In Progress) Workforce integration planned	Hybrid/ Federated	Service delivery	(Florida Jobs, 2021)
GA	Georgia's Academic and Workforce Analysis and Research Data System	UI/Wage	Centralized	Analysis	(ECS, n.d.); (GOSA, n.d.)
HI	Hawaii Data eXchange Partnership	Workforce (data dictionary not publicly available)	Centralized	Analysis	(ECS, n.d.)
IA	(WIOA State Plans)	(Exploring)	N/A	N/A	(U.S. DOE, 2022b)
ID	Educational Analytics System of Idaho	UI/Wage	Federated	Analysis	(ECS, n.d.); (Mehl, 2023)
ID	(WIOA State Plans)	(In Progress)	Federated	Analysis	(U.S. DOE, 2022a)
IL	Illinois Longitudinal Data System	(In Progress) Workforce integration planned	Federated	Analysis	(ECS, n.d.); (ISBE, n.d.)
IL	(WIOA State Plans)	(In Progress)	Federated	Service delivery	(U.S. DOE, 2020a)
IN	Indiana Management Performance Hub	Workforce (data dictionary not publicly available)	Centralized	Analysis	(AISP, n.d.); (ECS, n.d.)

KY	The Kentucky Center for Statistics (KYSTATS)/Student Statewide Longitudinal Data System	UI/Wage	Centralized	Analysis	(AISP, n.d.); (ECS, n.d.); (Ross, 2023)
LA	(WIOA State Plans)	(In Progress)	Centralized	Analysis	(U.S. DOE, 2020b)
MD	Maryland Longitudinal Data System	Employment status, employer information, employment location, wage	Centralized	Analysis	(ECS, n.d.); (MLDS, n.d.)
MA	Edwin Analytics	Wage	Centralized	Analysis	(ECS, n.d.); (MA DOE, n.d.)
MA	Data Sharing Framework and Statewide MOU	(Variable)	N/A	Analysis	(AISP, n.d.)
MI	(State WIOA Plans)	(Exploring)	N/A	N/A	(U.S. DOE, 2022c)
MN	Minnesota Statewide Longitudinal Education Data System	Employment status, wages	Centralized	Analysis	(ECS, n.d.); (SLEDS, n.d.)
MS	Mississippi LifeTracks	Career readiness certificate, workforce training, wages, employment, workforce investment training, rehabilitation services	Centralized	Analysis	(ECS, n.d.); (LifeTracks, n.d.)
NE	Nebraska Statewide Workforce & Educational Reporting System	Wage	Centralized	Analysis	(ECS, n.d.); (NSWERS, n.d.)
NV	Nevada P20-W Research Data System	Wage	Federated	Analysis	(ECS, n.d.); (NPWR, n.d.)
OH	Ohio Longitudinal Data Archive	UI/Wage, employment services, registered apprenticeship, vocational training, remedial skills training, VR	Centralized	Analysis	(ECS, n.d.); (OSU, n.d.)
OR	Oregon Statewide Longitudinal Data System	Wage	Federated	Analysis	(ECS, n.d.); (OLDC, n.d.)
OR	Integrated Client Services	TANF, SNAP, Intellectual/Developmental Disabilities, VR, employment	Federated	Analysis	(AISP, n.d.); (OR DHS, 2022)
OR	(State WIOA Plans)	Coordinated intake and eligibility portal	Centralized	Service	(U.S. DOE, 2022d)
RI	Integrated Health and Human Services Data Ecosystem	DOL's wage, income insurance, and job training data; TANF; SNAP	Centralized	Analysis	(AISP, n.d.); (RI HHS, 2024)

TN	P20 Connect TN	Workforce (data dictionary not publicly available)	Centralized	Analysis	(ECS, n.d.)
UT	Utah Data Research Center	Employment status, wages, employer, industry	Centralized	Analysis	(ECS, n.d.); (UDRC, n.d.)
VA	Virginia Longitudinal Data System	Trade Act, UI/wages, WP, VR, DARS, Adult Education	Federated	Analysis	(ECS, n.d.); (VLDS, n.d.)
WA	Education Research and Data Center	SBCTC data; L&I apprenticeship data; ESD's UI wage data; Secondary Career and Technical Education	Centralized	Analysis	(ECS, n.d.); (ERDC, 2020)
WA	DSHS' Integrated Client Database	ESD's UI wage data; ESA's TANF data; VR's vocational assessment, service, education/training, and case management data	Centralized	Analysis	(AISP, n.d.); (DSHS, 2010)
WA	Workforce Integrated Data Sharing	(In Progress) Workforce training programs, employment and wages	Federated	Operational	
WI	Workforce Data Integration System	Employment training, VR, UI/wages	Centralized	Analysis	(WI DWD, n.d.)
WI	Administrative Data Core	UI/Wage, TANF, SNAP	N/A	Analysis	(AISP, n.d.); (Frederick, 2023)

## Appendix B – Data Governance

### Board Sponsor(s)

The Board or Managing Entity will elect board sponsors to serve. The term for serving as Board Sponsor(s) will be predicated on the determination of the Board or Managing Entity and upon the needs of the initiative.

#### *Responsibilities*

- Serve as the Chair of the Steering Committee, providing oversight of the cross-agency initiatives and alignment to the values and priorities of the Workforce Board.
- Act as an advocate and facilitate resourcing and prioritization with the Workforce Board for the cross-agency initiatives and supporting workforce systems integration.

### Managing Entity

#### *Responsibilities*

- Serve as the coordinating lead among the data-owning partner agencies and stakeholders.
- Represent workforce system-wide interests in the full lifecycle of the data and systems integration efforts and mediate across partners to ensure alignment and shared vision.
- Facilitate the interagency collaboration in the Data Governance Council, including the coordination of workflows across the organizational structure within the Council.
- Oversee the vendors, contracts, and external partnerships necessary for the planning, implementation, and accountability of the data integration project.
- Establish and strengthen partnerships with external stakeholders to align with statewide strategies and priorities, including coordination with WaTech and OFM, among others.
- Lead the project management of the data integration project, representing the cross-agency interests of the Workforce Board as well as the workforce system agency partners. Project management will include identification of the roadmap, risk mitigation strategies, timely project progress, and addressing roadblocks —among others.
- Procure resources to support the cross-agency information technology projects.
- Mediation and dispute resolution: The Managing Entity will facilitate discussion when disagreements arise. For larger grievances among partners, the Managing Entity will bring in external counsel, as needed, to address, mediate, or resolve such grievances.

### Steering Committee

The Steering Committee is represented by state workforce agencies identified as data contributors for the data integration project. Each data-contributing agency would appoint a designee to represent the agency in the Data Governance Council. This may be an agency head or a delegate who has been granted decision-making authority.

These partners include:

- 8) Department of Services for the Blind (DSB)
- 9) Department of Social and Health Services (DSHS)
  - a. Division of Vocational Rehabilitation (DVR)
  - b. Economic Services Administration (ESA)
- 10) Employment Security Department (ESD)



- 11) Department of Labor and Industries (LNI)
- 12) State Board for Community and Technical Colleges (SBCTC)
- 13) Office of Superintendent of Public Instruction (OSPI)
- 14) Workforce Training and Education Coordinating Board (Workforce Board)

#### *Responsibilities*

- Represent agency leadership in the decision making of data integration efforts.
- Ensure alignment between the vision, priorities, direction, and implementation of the portfolio of data integration IT projects with the agency's priorities and needs.
- Review the recommendations of the respective subcommittees and serve as the authoritative decision-making body for the data integration efforts.
- Determine additions to membership for the Data Governance Council, including Steering Committee, subcommittee, and ex officio membership.
- Address roadblocks or other challenges to support project implementation.

#### *Subcommittees*

The subcommittees are represented by state workforce agencies identified as key subject matter experts (SME) for the data integration project. Each SME has been selected by Steering Committee members to represent the agency in the Data Governance Council. Subcommittees are broken out by substantive area on programmatic, data privacy and regulations, data systems and technology, and data analytics.

#### *Programmatic Subcommittee Responsibilities*

- Coordinate and align with the TAP strategic priority for systems integration, including data sharing, coordinated intake, and any additional effort to realize service integration.
- Align operations with ongoing statewide workforce initiatives and projects, preventing duplication and ensuring cohesion with other agency efforts and goals.
- Understand the user experience within the workforce system, including an examination by user personas and/or profiles.
- Identify business needs or gaps in the state's workforce system pertaining to data and system integration, including challenges experienced at the state or local administrative level or by frontline staff, jobseekers, and employers.
- Recommend key information (e.g. data elements) for data sharing that would support workforce service partners and an integrated workforce system.
- Collect qualitative data to capture user experience or user feedback on how to enhance systems integration. Feedback may also include input and comments on design proposals or pilots to support a continuous improvement cycle.
- Coordination with the Data Systems & Technology Subcommittee in the translation of programmatic needs into technical requirements.
- Have a grounding in the regulatory landscape that programs adhere to that affect or determine how systems are or can be integrated. Consultation with the Data Privacy & Security Subcommittee ensure compliance with regulatory standards.
- Lead in recommendations for statutory changes to support workforce systems integration.

#### *Data Privacy & Regulations Subcommittee Responsibilities*

- Serve as the subject matter experts on data security and privacy regulations for the agency, including compliance with state and federal regulations. Provide consultation to subcommittees in understanding security and privacy regulations impacting feasibility or design parameters.
- Have key input into governance of data security and privacy, including formal agreements like the memorandum of understanding (MOU) or data sharing agreements (DSAs).
- Facilitate discussion with legal counsel or contracts management staff at the agency.

#### *Data Systems & Technology Subcommittee Responsibilities*

- Operationalize the programmatic needs of the data and service integration efforts, as identified and in partnership with the Programmatic Subcommittee.
- Oversee technical feasibility studies to inform implementation and operational strategy.
- Identify technology and data management best practices, as supported by industry and landscape analysis of similar efforts, to inform technical design and recommendations.
- Ensure operational design and implementation is compliant with data governance policies and regulations at the agency, state, and federal level through coordination with the Data Privacy & Security Subcommittee.
- Serve as the oversight body for product development and ongoing operations and maintenance of technology products and tools.
- Determine the level of investment and resourcing needed to achieve and maintain the technology infrastructure for data and systems integration.

#### *Data Usage & Analytics Subcommittee (Analytics)*

The Workforce Board and ESD staff jointly oversee an Evaluation working group that is tasked with finalizing the state workforce evaluation plan and reports directly to the Workforce Board with ongoing evaluation recommendations. The Evaluation working group may be leveraged to fulfill the data usage and analytic considerations for the integrated data sharing initiative.

#### *Responsibilities*

- The Analytics Subcommittee will stay informed of state workforce system deliberations pertaining to the development and implementation of the state evaluation plan and representing those interests in the data integration priorities.
- The Analytics Subcommittee will be the forum to propose, discuss, and approve the use of data to provide statewide insights or analytics.
  - If a partner agency's data is being requested for inclusion in any approved studies, the agency representative will determine if the agency's data may be used towards the approved study.
- The Analytics Subcommittee may partner with the partner agencies' contract management personnel to finalize data sharing agreements.
- The Analytics Subcommittee will lead decisions on external data uses, if any, with data-owning agency approval.
- The Analytics Subcommittee will provide input to the Data Integration Project, as needed, to inform additional data elements that would be instrumental in answering key research questions about the state's workforce system. This input will be used, in conjunction with other identified needs, to prioritize additional data integration and sharing efforts.

## End User Advisory Group

The Frontline Advisory Group is intended to prioritize a user-centered design approach. This advisory group will capture the experiences of frontline staff in determining data and system integration needs and frame the discussion and priorities of the Programmatic Subcommittee. The Frontline Advisory Group is also intended to provide feedback of experiences for any data sharing or system integration pilots and serve as a feedback loop to iterate on process or design. The specific responsibilities and operation of the Frontline Advisory Group will be determined by the Programmatic Subcommittee, including the appropriate time to stand up this advisory group, defining the scope, and identifying the appropriate participating members, including strong partnership with the Local Workforce Development Boards (LWDBs) and the Washington Workforce Association (WWA).

## Ex Officio Members

### *Responsibilities*

Provide subject-matter expertise to the Data Governance Council, either at large or in consultation to a dedicated group. Examples of honorary ex officio members may include representation from data and technology partners such as the Office of the Chief Information Officer (OCIO) or the Office of Financial Management (OFM); it may also include workforce system partners like the local Workforce Development Boards (LWDBs), Department of Commerce or Department of Corrections.

## Appendix C – Regulations

### Consent

#### All State Workforce Agencies and Workforce Local Development Boards

- A recommendation is to have participants sign release forms acknowledging the use of their personally identifiable information for grant purposes prior to the collection of PII or other sensitive information (U.S. DOL, 2012).

### DVR/DSB

- There is no federal requirement for a VR agency to obtain participant consent in order to release personal information if the use is directly related to the administration of the VR program or for audit, evaluation, or research purposes to support VR program administration or improvement the quality of life for participants and in accordance with a written agreement (U.S. DOE, n.d.).
- 34 RCW 361.38: In cases not permitted as listed above, the recipient of services can request that all requested information be accessible and shared in a timely manner. The sharing of information must showcase a necessity for the program to do so. Even in such cases, medical or psychological information that should not be released to the individual for concerns of creating harm, recipient agencies must ensure said information is not further released to the individual (Code of Federal Regulations, 2016).

### ESD

- Title 20 CFR § 603.5: Release of confidential UI information is permissible with informed consent when:
  - The individual provides a “written release” (including electronic) OR
  - Another form of consent is provided, as permitted by State UC agency and in accordance with state law, when a written release is impractical or infeasible to obtain (Code of Federal Regulations, 2016).
  - The use case for ongoing data disclosure must be restricted to carrying out an administrative or evaluative purpose for the program or provide a service or benefit as a result of the individual signing the release.
- RCW 50.13.060: Information under Title 50 (Unemployment Compensation) can be accessed by state agencies, among others, when needed for “official purposes.” One case includes the sharing of information or records under the WorkFirst program for analytical or evaluation purposes.
  - ESD may also enter into data sharing agreements with one-stop system partners as necessary for the efficient delivery of workforce programs. In this case, the individual must be notified of data sharing for this purpose, in which the individual will have option to prohibit the information from being shared—which the agency must honor.

### Unique Identifier

DOL’s Employment and Training Administration advises, “whenever possible”, to move towards a unique identifier for individual or information tracking. While social security numbers might be needed initially for identification, a unique identifier can be linked and used thereafter (U.S. DOL, 2012). This guides the pursuit of a unique workforce system identifier that moves away from the reliance of social security numbers as one of the key identifiers for participants.

## Data Security

- Compliance is needed with EA-183.20.10, which identifies the state’s Enterprise Active Directory (EAD), SecureAccess Washington (SAW), and Transact Washington (TAW) as user authentication solutions for state government.
- WaTech’s Standard No. 141.10 provides the requirements for maintaining systems and network security, quality, and confidentiality.
- RCW 43.105.375: The provision indicates that state agencies shall locate existing and new information “investments” in either the state data center or with third-party cloud computing services.

## Personnel Data

Key contacts, like case managers, in the workforce system would be a critical addition to support coordination of services between agencies. This information is deemed public record, and employee personnel files are not exempt by and large. The personal information protected under an individual’s right to privacy is outside the scope of information captured under the Workforce Data Integration project and would be permissible under state guidelines.

## SNAP

There are strict regulatory requirements for the sharing of SNAP participant information and is primarily focused on the administration of the SNAP program. There are federal guidelines encouraging collaboration between workforce partners and the employment and training program under SNAP. However, there is continued ambiguity of how to specifically operationalize such a partnership and further federal guidance will be needed.

- 7 CFR 272.1c: Identifies accepted cases of disclosure, primarily focused on administration of SNAP or for select federal programs that necessitate SNAP information for eligibility, benefit amounts, or another administrative purpose.
- Under § 273.7(c)(17)(x), “State agencies certifying workforce partnerships for operation in their State in accordance with paragraph (n) of this section may report relevant data to demonstrate the number of program participants served by the workforce partnership, and of those how many were mandatory E&T participants” —with workforce partnerships being defined as “An entity identified as an eligible provider of training services under section 122(d) of WIOA.”
- “The Department of Labor’s Employment and Training Administration (ETA) and the Department of Agriculture’s Food and Nutrition Service (FNS) are partnering to encourage SNAP agencies and state and local workforce agencies to develop shared strategies that will better connect SNAP participants, particularly those who are subject to time-limited benefits, to employment and training opportunities through programs in American Job Centers... ETA and FNS encourages agencies and organizations that administer employment and training programs under WIOA Title I or the Trade Act to conduct outreach to SNAP beneficiaries to support their employment or career advancement. Agencies and programs are also encouraged to coordinate messaging and recruitment efforts with SNAP agencies in order to reach individuals who are searching for work, and who may need to work or be enrolled in training to maintain eligibility for SNAP benefits. While all employment and training programs are encouraged to conduct outreach to potential participants, including those receiving SNAP benefits, the WIOA Adult and Youth programs are particularly well positioned to serve SNAP beneficiaries” (DOL, 2023).

## Health Data

- 42 CFR Part 2 Subpart C: Title 42 CFR Part 2 pertains to patient records of federally assisted programs for the treatment of substance abuse disorders. Disclosure can occur with patient consent so long as enumerated consent requirements are met, like name, type of date, date of expiration, date, and signatory.
- 42 CFR Part 2 Subpart D: Several limited use cases for sharing data under Title 42 CFR Part 2 are permitted without consent. These include only in cases where the recipient is HIPAA-covered entity, subject to HHS regulations for the protection of human subjects, and/or subject to FDA regulations regarding protection of human subjects. Other permitted data disclosures are for the audit or evaluation of the Part 2 program and other select public medical programs. Supplemental provisions outline additional aspects of data management and data use, like linkages, reporting in aggregation, or redisclosures.

## Administration & Evaluation

The Workforce Board also has responsibilities to carry out statewide workforce development reporting and evaluation. Existing data sharing occurs, largely to enable program evaluation.

## General

- RCW 42.48.020: State agencies are permitted to provide personally identifiable person records for research, without informed consent, when 1) a research review board carries out a review of the merit and disclosure risks of the research, 2) disclosure is compliant with federal laws, and 3) is governed by a written and legally binding confidentiality agreement.
- RCW 39.34.240: Data requests between public agencies that contain Category 3 data or higher require a written agreement in accordance with policies of the office of cybersecurity.

## WIOA

- TEGL 23-19: Crossmatch with a secondary or postsecondary education database is deemed valid WIOA source documentation to meet the needs of “documented gains” under federal reporting requirements (U.S. DOL, 2020).

## DVR/DSB

- DVR and DSB participant records are not subject to HIPAA compliance as per RSA-IM-01-44. The rule states, “the requirements governing electronic transmission of health care information—in particular, the Administrative Simplification provisions in Subtitle F of Title II under HIPAA and in 45 CFR Parts 160 and 162—do not apply to State VR agencies.”
- DSB shares data elements identified under the RSA Vocational Rehabilitation Program Case Service Report Policy Directives (RSA-911), including PD-13-05, PD-14-01, and any additional revisions. Additionally, administrative system data, such as DSB office locations and system-generated participant IDs, are also shared. Sharing of data is restricted to what is needed for identity matching or for federal reporting purposes.

## ERDC/OSPI/SBCTC

- FERPA contains an audit or evaluation exception that allows the sharing of personally identifiable information from education records for that education program (U.S. DOE, n.d.).

- 99.3: An “education program” is any job training, career and technical education, and adult education—among others—administered by an educational agency or institution (Code of Federal Regulations, 1988).
- National Council of State Education Attorneys (NCOSEA) indicated that a program is deemed an education program “based on the totality of the program, and not on whether the program contains a specific incidental educational or training activity within a broader non-education program” (NCOSEA, 2020).
- 43.41.400: ERDC was established to provide collaborative analyses across education and workforce, which includes the Workforce Training & Education Coordinating Board. ERDC will create a repository of student record data for research use and will provide data to the legislative evaluation and accountability program committee for such purposes.

#### ESD

- RCW 28C.18.060: The Workforce Board is to conduct an outcome evaluation for the state’s workforce training system every two years. This scientifically-based study is to include surveys of program participants and employers of program participants along with payroll and wage data from the Employment Security Department—at a minimum. A net impact and cost benefit study is also to be carried out for the state training system every five years.

## Appendix D- Milestones







Description	Start Date	End Date
<b>2023-2025: Phase I – Feasibility Study</b>		
<b>Feasibility Study</b>		
Conduct landscape analysis and feasibility study of programmatic, regulatory, and technical feasibility of data integration project.	Sep '23	Jun '24
Submit legislative report on the programmatic, regulatory, and technical feasibility of data integration project.	Jun '24	Sep '24
<b>Data Governance</b>		
Expand upon existing Steering Committee and Technical Advisory Group to full Data Governance Council. Programmatic Sub-Committee Formalization of existing Data Systems & Technology and Data Privacy & Security Sub-Committees Evaluation Sub-Committee	Jul '24	Aug '24
Draft MOU and DSA templates	Sep '24	Dec '24
Signed MOU among Partner Agencies	Jan '25	Mar '25
<b>Pilot</b>		
Submit Innovation & Modernization Program funding proposal	Mar '24	Jun '24
Innovation & Modernization Program - Pilot <ul style="list-style-type: none"> <li>• Enact scrum project management ceremonies</li> <li>• Requisition/contract with third-party identity resolution vendor</li> <li>• Adjust existing DSA to include data sharing for third-party identity resolution vendor</li> <li>• Contract for enterprise cloud solution</li> <li>• Data extract jobs scheduled for ingestion into workforce database</li> <li>• Data extract jobs scheduled for third-party identity resolution vendor</li> <li>• Ingestion of identity resolution matched ID</li> </ul>	Jul '24	Jun '25
<b>Phase II: Pre-Implementation</b>		
Submit decision package requesting implementation funding for data integration project (Phase II).	Jun. '24	Sep. '24
Needs assessment for coordinated intake and frontline data lookup portal.	Aug. '24	Mar. '25
Report on programmatic needs assessment of coordinated intake and frontline data lookup portal -include statutory needs	Apr. '25	Jun. '25
<b>2025-2027: Phase II - Data Sharing</b>		
<b>Infrastructure &amp; Capital</b>		
Hiring for open job requisitions (dev. Support)	Jul. '25	Jan. '26
(If not already completed under 24-25 Pilot) Requisition/contract with third-party identity resolution vendor	Jul. '25	Oct. '25
(If not already completed under 24-25 Pilot) Contract for enterprise cloud solution	Jul. '25	Aug. '25
(If not already completed under 24-25 Pilot) Enact agile project management ceremonies	Jul. '25	Aug. '25
Environment configuration for identity resolution vendor	Oct. '25	Dec. '25
Environment configuration for enterprise cloud solution	Aug. '25	Oct. '25
Requisition under DES' statewide IT service contracts for web development (will continue in Phase III, as needed)	Apr. '27	Sep. '27









<b>Data Governance</b>		
Signed DSAs among Partner Agencies (Group 1)	Jul. '25	Oct. '25
Signed DSAs among Partner Agencies (Group 2)	Jan. '26	Apr. '26
<b>Data Sharing</b>		
Data or file transfer configuration from partner agencies (Group 1)	Oct. '25	Jun. '26
Data transformation and consolidation	Oct. '25	Jun. '26
Data or file transfer configuration from partner agencies (Group 2)	Jun. '26	Mar. '27
Data reingestion pilot (Selected Partner Agency from Group 1)	Jun. '26	Mar. '27
<b>Analytics &amp; Evaluation</b>		
Final approval of data utilization pilot project	May '26	Jun. '26
Model prototype -including peer review process	Jul. '26	Mar. '27
Report of results and recommendations to scale	Apr. '27	Jun. '27
Identity resolution validation study		
<b>Documentation</b>		
1 <sup>st</sup> Legislative Report	Jul. '25	Sep. '25
2 <sup>nd</sup> Legislative Report	Jul. '26	Sep. '26
Monthly status report & retrospectives	Jul. '25	Jun. '27
<b>Phase III: Pre-Implementation</b>		
Regulatory, technical, and fiscal feasibility study for coordinated intake and, if applicable, frontline data lookup portal.	Sep. '25	Apr. '26
Submit decision package requesting implementation funding for data integration project (Phase III)	Jul. '26	Sep. '26
<b>2027-2029: Phase III - coordinated intake</b>		
<b>Infrastructure &amp; Capital</b>		
Requisition under DES' statewide IT service contracts for web development (continued from Phase II, as needed)	Apr. '27	Sep. '27
Requisition under DES' statewide IT service contracts for help desk support (if needed)	Jun. '27	Sep. '27
Expansion of contract for enterprise cloud solution to include document sharing functionality (e.g. transference of documents alongside data)	Jul. '27	Jul. '27
Application Portal Development	Jul. '27	Apr. '28
Data Lookup Portal Development (TBD based on needs assessment)	TBD	TBD
<b>Data Sharing &amp; Automation</b>		
Data connection between application portal and data warehouse, including both data and document sharing functionality	Mar. '28	Jun. '28
Automate eligibility determination & referral	May '28	Aug. '28
System modification in Pilot(s)' system to reingest application & referral data	Sep. '27	Aug. '28
Pilot(s) reingestion of application & referral data	Aug. '28	Dec. '28
<b>Analytics &amp; Evaluation</b>		
Data Utilization/Evaluation priorities set for Phase III	Jul. '27	Sep. '27
Reporting deliverable(s) TBD	TBD	TBD
<b>Data Governance</b>		
Finalize consent language for data sharing in shared application	Jul. '28	Oct. '28

<b>Pilot &amp; Feedback</b>		
Prepare trainings & materials for web portal usage: customers and frontline staff (including review)	Jul. '28	Oct. '28
Two rounds of training for pilot(s)' frontline staff	Nov. '28	Dec. '28
Pilot(s) launch of coordinated intake application portal	Jan. '29	Jun. '29
Qualitative feedback of experiences with new portal	Apr. '29	Jun. '29
<b>Documentation</b>		
1 <sup>st</sup> Legislative Report	Jul. '27	Sep. '27
2 <sup>nd</sup> Legislative Report	Jul. '28	Sep. '28
Monthly status report & retrospectives	Jul. '27	Jun. '29
<b>2029-Onwards: Systemwide Release</b>		
The culmination of Phase II and III will be for a full release of an integrated system, supported through technology, following Phase III. Details of this phase will be informed by the progress, experience, and findings from Phase II and III.		

## Appendix E – Risk & Mitigation Strategy

COMPONENT	RISK	MITIGATION STRATEGY	<b>RISK LEVEL</b>  Low  Medium  High
Staffing & Capital	<ul style="list-style-type: none"> <li>This project is precipitating pre-requisite data modernization efforts, like a migration from on-prem to cloud-based solutions.</li> <li>Contract and job requisitions are lengthy processes, particularly for technical roles.</li> <li>There is a need to build internal staff and capacity to support this work long term.</li> </ul>	<ul style="list-style-type: none"> <li>Receiving appropriate funding to support this work is critical to the success of this initiative.</li> <li>The timeline is adjusted accordingly to account for appropriate lead-up time to development to ensure timely progress is not impacted.</li> <li>A partnership with WaTech and the attendant expertise and resources are being leveraged in an “accelerator” program to support with initial technology work, permitting a transition period for handoffs to dedicated contracts or staff to continue operations and maintenance of the work.</li> </ul>	
Identity Matching Solution	<ul style="list-style-type: none"> <li>A landscape review revealed an existing state effort to improve and systematize identity matching when bridging information from multiple sources. This effort is the Master Person Index, under the Health &amp; Human Services Coalition, and captures the needed scope of the workforce data integration project.</li> </ul>	<ul style="list-style-type: none"> <li>To ensure efficiency and good stewardship of state resources, the project is pursuing collaborations to minimize duplication of effort or resources.</li> <li>The Master Person Index is anchored to the work of the Health &amp; Human Services Coalition and its associated partner agencies; awaiting deliberation of if a partnership with the workforce system can ensue.</li> <li>Contingency plans include collaborative pursuit of an identity matching solution with WaTech, given the shared need for the respective agency’s strategic priorities.</li> </ul>	
Identity Matching Solution	<ul style="list-style-type: none"> <li>The effectiveness and security of interagency data sharing is highly contingent on the accuracy of</li> </ul>	<ul style="list-style-type: none"> <li>A validation step will be incorporated in the early stages of implementing an identity matching solution. This will ensure objective</li> </ul>	

	identity matching. It is necessary to validate that identity matching solution.	evaluation of the matching solution and identification of improvements to the algorithm to improve the matching process as needed.	
Change Management	<ul style="list-style-type: none"> <li>In addition to procedural changes, there are additional informal practices that will also be impacted. A strong change management strategy is necessary to ease buy-in, confusion, or other strains associated with implementing system changes.</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing collaboration with agency administrative and frontline staff through the Programmatic Subcommittee will work on service integration efforts and ensuring preparation and implementation supports as well as frequent touch points to support in key transition phases.</li> </ul>	
Data Governance	<ul style="list-style-type: none"> <li>A high level of coordination is needed across data-owning workforce partner agencies to capture common needs and interests. Each agency has their own channel of decision-making, strategic priorities, and roadmaps. This project must complement and support agencies without overlapping with or creating inefficiencies with exists processes.</li> </ul>	<ul style="list-style-type: none"> <li>A formal Data Governance Council has been launched, first beginning with a Steering Committee in Jan 2024 followed by a formalization of a cross-agency “working group” into formal subcommittees by July 2024.</li> <li>The data-owning partner agencies have submitted a Letter of Intent to signal collaboration and commitment to the data integration project leading up to funding requests for a Phase II and prior to a formal memorandum of understanding being signed by partners.</li> </ul>	
Data Security & Privacy Regulations	<ul style="list-style-type: none"> <li>Exploration of operational data sharing expands beyond the more common reporting and evaluation-focused data sharing observed in the workforce system. Navigating the legal landscape to ensure agency, state, and federal regulations is essential to the success of the project.</li> </ul>	<ul style="list-style-type: none"> <li>This project is guided by the strictest data security and privacy considerations and has carried out a literature review of agency, state, and federal regulations to inform agreements and built in procedures, like active consent, to ensure model data governance. Additional discussions with key agency staff knowledgeable in data security and privacy have guided the design strategy for the project.</li> <li>Building up internal legal counsel support will be necessary as a fixture of the Data Governance Council to ensure regulatory</li> </ul>	

		compliance at all stages of the data integration project.	
Consent	<ul style="list-style-type: none"> <li>A major facet of operational data sharing will rely on customer consent to share information beyond permissible data sharing, as specified in statutes. Particularly in cases of active consent, or where a customer consents to data sharing, agreement rates tend to be low.</li> </ul>	<ul style="list-style-type: none"> <li>A regulatory review for permissible cases of data sharing does not signal where active or passive consent is required, only that “informed consent” is needed. By and large, agencies have adopted either active or passive consent already. Deliberation of whether flexibility to use active or passive consent by each agency will be considered as well as strong change management to promote consent to sharing data to better serve customers.</li> </ul>	
Scoping	<ul style="list-style-type: none"> <li>The multiple technology efforts to support an integrated workforce system are intricate. While the work is aligned with the four-year TAP plan, the work does span several years for development.</li> </ul>	<ul style="list-style-type: none"> <li>The distribution of work is intentional, honoring the complexity of the work, strategically sequencing work based on a waterfall framework and the inherent dependencies involved in the project.</li> </ul>	
Staggered Implementation	<ul style="list-style-type: none"> <li>Across the workforce system partners, there are active projects and priorities for agencies that may affect the timeline for data integration implementation. This may include agency case management system migrations or vendor constraints for implementing system changes.</li> </ul>	<ul style="list-style-type: none"> <li>A staggered implementation plan is proposed, with a set of early and later adopters. This will allow flexibility for agencies to coordinate among existing priorities, target focus on a subset of agencies during the implementation phase, as well as allot reflection and iteration from the first wave of adopters in improving the system and processes.</li> </ul>	
Cadence of Data Sharing	<ul style="list-style-type: none"> <li>To support program operations, the scope of work captures near real-time data sharing.</li> </ul>	<ul style="list-style-type: none"> <li>Current data sharing efforts in the workforce system are nearly all on a quarterly or yearly cadence. Data pipelines will need to be built and support provided to ensure the movement towards real-time data sharing.</li> </ul>	