Educational Workforce
Privacy and Data Suppression Policy

Effective December 2021 | Last Updated January 27, 2022

I. Authority	The Office of the State Superintendent of Education (OSSE) collects, analyzes, stores and reports on many public data. OSSE has the authority to adopt and implement policies that increase the privacy and security of these data.
II. Applicability	This policy applies to all educational workforce data that OSSE releases publicly or to parties as requested, including as required under the Elementary and Secondary Education Act[1] (as amended by the Every Student Succeeds Act[2]). OSSE will apply this policy to public data releases from the date of publication of this policy. Some, though not all, historical files may be updated to meet this standard. This policy will undergo periodic review to ensure all standards remain applicable to OSSE's data sharing and privacy practices. OSSE reserves the right to update this policy based on these reviews.
III. Rationale	This policy strengthens OSSE's data sharing and privacy practices by setting requirements about the methods for and full scope of data suppression for educational workforce data released by OSSE. This policy complements OSSE's Student Privacy and Data Suppression Policy and encourages standard data privacy practices across all agency aggregate data releases. In creating this policy, OSSE aims to balance the values of transparency, privacy, equity in reporting, and consistency of practice throughout all publicly released educational workforce data.
IV. Policy	OSSE will apply the following rules to educational workforce data files: • OSSE will apply its Student Privacy and Data Suppression Policy to any released data

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[1] Elementary and Secondary Education Act, Public Law 89–10 (1965).
[2] Every Student Succeeds Act, 20 U.S.C. § 6301 (2015).

about participants in Educator Preparation Programs (EPPs).

- OSSE will apply consistent suppression rules to all publicly released educational workforce effectiveness data files. The suppression rules listed below will be applied in the order listed.

1. Denominators less than 10 and their corresponding percentages shall be reported as n<10.

2. Data shall be top- and bottom-coded variably based on the denominator according to the table below. This provides the greatest amount of information while protecting personally identifiable information.

Denominator	Suppression level
10-20	<=10% and >=90%
21-100	<5% and >95%
101-1000	<1% and >99%
1001+	<.1% and >99.9%

3. In instances in which both the numerator and denominator are reported and the percentage (whether or not that percentage is reported in the file) would be top- or bottom-coded (e.g., 99.5% with a denominator of 150), OSSE shall suppress the numerator (i.e., "Dually Suppressed" (DS)), leave the denominator unsuppressed, and top- or bottom-code the related percentage. If only the denominator and percentage are reported, then data shall be top- and bottom-coded as outlined in (2) and the denominator shall not be suppressed.

4. Data shall be complementarily suppressed (denoted as "DS") in instances in which cells would be able to be identified by subtracting one or more subtotals from a total. The "DS" shall be applied to the cell with the next smallest denominator (or to multiple cells as required).

V. Definitions	**Bottom Coding:** - Suppress with a bottom-code; is a lower limit on all publicly released values for a variable.[3] **Complementary Suppression/Dual Suppression:** - To reach the desired protection for risky cells, it is necessary to suppress additional non-risky cells, which is called dual suppression or complementary suppression. OSSE inserts "DS" to denote any instance of this method.[4] **Data:**

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[3] SLDS Technical Brief "Statistical methods for Protecting Personally Identifiable Information in Aggregate Reporting"
[4] PTAC "Frequently Asked Questions- Disclosure Avoidance"
studentprivacy.ed.gov/sites/default/files/resource_document/file/FAQs_disclosure_avoidance.pdf

- Expressed information representing facts in a variety of qualitative and quantitative forms, including aggregate, individual level, and personally identifiable information.

Data Release:
- Publication of aggregate data accessible to the public.

Educational Workforce
- Instructional, administrative, paraprofessional and support staff at local education agencies (LEAs), community-based organizations (CBOs) (including those specializing in postsecondary education), and public schools and public charter schools.

Educational Workforce Effectiveness Data
- Summative ratings of educator performance and effectiveness, as determined by LEAs or CBOs through their evaluation systems.

Minimum n size:
- To have a minimum sample size; the minimum number (n) necessary to publicly release a subgroup value without jeopardizing privacy.[5]

Personally Identifiable Information (PII):
- PII is information that, alone or in combination with other data, can be linked to a specific person, including but not limited to:[6]
    - Name;
    - Address;
    - Personal identifier, such as a Social Security Number;
    - Indirect identifiers, such as date of birth, place of birth, or mother's maiden name.

Suppression:
- When releasing aggregate data, withholding or removing select data from a cell to prevent the identification of individuals in small counts, typically based on n-size.[7]

Top Coding:
- Suppress with a top-code for a variable; is an upper limit on all publicly released values of that variable.[8]

VI. OSSE Expectations for Data Suppression Review	OSSE expects all publicly released data and reports to go through a thorough Quality Assurance process to ensure the data suppression applied meets the standards stated in this policy. This expectation applies to any third party releasing data on behalf of OSSE as well as any internal release. OSSE staff can reference internal guidance for further information on this process.

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[5] DQC "Understanding Minimum N-Size and Student Data Privacy: A Guide for Advocates"
[6] National Institute of Standards and Technology, csrc.nist.gov/glossary/term/PII
[7] PTAC "Data De-identification: An Overview of Basic Terms"
studentprivacy.ed.gov/sites/default/files/resource_document/file/data_deidentification_terms_0.pdf
[8] SLDS Technical Brief "Statistical Methods for Protecting Personally Identifiable Information in Aggregate Reporting"

VII. Other Considerations	Nothing in this policy changes or supersedes requirements or restrictions under the District's Freedom of Information Act (FOIA).
VIII. Further Information	For more information on this policy, please contact OSSE.datasharing@dc.gov.