

**MEMORANDUM OF UNDERSTANDING  
BETWEEN  
THE COUNTY OF SONOMA  
AND  
SCHOOL DISTRICTS  
FOR  
INFORMATION SHARING**

This Memorandum of Understanding "MOU" is made and entered into this \_\_\_\_ day of \_\_\_\_\_, 20XX, in the State of California, by and between the County of Sonoma (hereinafter "County") and the Santa Rosa City School District (hereinafter "School District"), collectively "the Parties."

**RECITALS**

Whereas, the Parties understand and agree that information sharing is essential to achieving their shared goals of enhancing the health, education, and welfare of children and their families;

Whereas, the County may from time to time fund particular programs specifically designed to help certain children achieve academic success and both County and School District have a mutual interest in evaluating the efficacy of those programs;

Whereas, from time to time the disclosure to County of pupil records may be necessary in order to assist the County in delivering, evaluating, and improving services for students served by School District;

Whereas, the Parties desire to commit to sharing information within the confines of federal and state law and commit to protecting from disclosure to third parties personally identifiable information that is confidential under state or federal law.

**AGREEMENT**

Now, therefore, in consideration of the covenants and agreements set forth herein, the receipt and sufficiency of which are hereby acknowledged, the Parties agree as follows:

1. This MOU includes Exhibits outlining specific data to be shared, the lead agency, planned usage, and provisions for confidentiality, all of which taken together shall constitute one agreement. Parties to this MOU will only share information as detailed in this MOU and as allowed by applicable laws and rules.

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2. "Pupil Records" as used herein shall refer to records defined as pupil records in Section 49061 et seq. of the California Education Code or personally identifiable education records as defined in 34 C.F.R. § 99.3 et seq. Pupil Records as used herein shall not be construed to include those items excluded in the foregoing statutes and shall not be construed to include aggregated or de-identified information that has been stripped of information that would permit County to identify individual students and parents to which the information applies.
  3. Each party shall be responsible for ensuring that its data is shared, matched, exchanged or used in compliance with all applicable state and federal laws. The Parties to this MOU acknowledge and agree that data shared by School District will meet the exemption requirements of Title 34 of the Code of Federal Regulations, section 99.31 and Education Code section 49076 (a)(1)(G). School District will ensure that informed consent from the subject's parent/guardian is obtained for all confidential data which does not meet one of the above-listed exemptions.
  4. The parties acknowledge the protections afforded to student health and related information under regulations adopted pursuant to the Health Insurance Portability and Accountability Act of 1996 (HIPAA), student records under the Family Educational Rights and Privacy Act (FERPA) 20 U.S.C. sec 1232g, California Education Code section 49073-49079.7, and under provisions of state law relating to privacy. The County shall ensure that all activities undertaken pursuant to this MOU comply with these requirements.
  5. The parties agree that the programs detailed in the Exhibits do not permit personal identification of parents and students to individuals other than representatives of School Districts, County Departments or their partners that have legitimate grounds for accessing the information as outlined in the attached Exhibits. Where required, information will be shared only with informed consent of the subject of the information and the subject's parents, as applicable.
  6. Parties shall conduct data collection and analysis functions (as detailed in Exhibits) in a manner that does not permit the personal identification of parents and students associated with Pupil Records, by anyone other than the persons specifically described in the Exhibits.
  7. Confidential data furnished by any party pursuant to this MOU will be used or disclosed only as specifically provided by this MOU. Confidential data furnished by any party pursuant to this MOU shall not be disclosed for use to any person other than the authorized parties' staff who is assigned to the use of data for the purposes authorized under this MOU.

8. The Parties agree to make a good faith effort to resolve informally any and all differences arising between them in the interpretation or performance of this MOU. If a dispute persists, either party may suggest an executive meeting for review and resolution. The party suggesting the meeting should identify the issues in dispute and coordinate a face-to-face meeting to review the issues and solution options. An executive officer for each party who has full authority to discuss the issues and commit to effective solutions shall attend and participate in the meeting. Also, those persons with firsthand knowledge of the issues must be available for the meeting. No dispute under this MOU shall be subject to litigation proceedings prior to completing the meeting, except for an action to seek injunctive relief.
9. The individuals executing this MOU on behalf of the Parties each represent and warrant that they have the legal power, right and actual authority to bind their respective Party to the terms and conditions hereof.
10. Unless expressly agreed to in an Exhibit, neither School Districts nor County will receive any funding under this MOU. Neither party shall be liable to the other for any costs or expenses paid or incurred in performing services pursuant to this MOU.
11. This MOU may be periodically amended, as evidenced in writing and signed by all parties, to include additional parties. Additional Exhibits will accompany amendments to this MOU to detail any new information, sharing practices, or policies
12. The term of this MOU shall be from July 1, 20XX through June 30, 20XX. Any party may terminate their participation in this MOU by giving the other parties thirty (30) days advance written notice of the effective date of termination.
13. School District will provide the dataset and/or electronic documentation of the datasets requested as detailed in the Exhibits.
14. County will implement data sharing practices as detailed in the Exhibits.

IN WITNESS WHEREOF, the parties have executed this MOU on the dates indicated below.

**SCHOOL DISTRICT NAME:**

\_\_\_\_\_

ADDRESS:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

By: \_\_\_\_\_

NAME, TITLE

Date:

\_\_\_\_\_

**COUNTY OF SONOMA**

**Sonoma County Department of Health Services**

1450 Neotomas Avenue, Suite 200

Santa Rosa, CA 95405

By: \_\_\_\_\_

Barbie Robinson, Director, Sonoma County  
Department of Health Services

Date: \_\_\_\_\_

Sonoma County Human Services Department

3600 Westwind Boulevard

Santa Rosa, CA 95403

By: \_\_\_\_\_

Angela Struckman, Director, Sonoma  
County Human Services Department

Date: \_\_\_\_\_

**APPROVED AS TO FORM FOR COUNTY**

By: \_\_\_\_\_  
Phyllis Gallagher, Deputy County Counsel

Date: \_\_\_\_\_

Sonoma County Probation Department

600 Administration Drive, Room 104J

Santa Rosa, CA 95403

By: \_\_\_\_\_

David Koch, Chief Probation Officer

Date: \_\_\_\_\_

**APPROVED AS TO FORM FOR DISTRICT**

By: \_\_\_\_\_  
School District Legal Counsel

Date: \_\_\_\_\_

## **Exhibit A**

### **Upstream Investments Initiative**

**Project Name:** Shared Outcome Measurement Backbone Staff Provision

**County Agency Lead:** Human Services Department for the Upstream Investments Policy Initiative

**Timeframe for the sharing and analysis of data:**

Start Date: July 1, 20XX

End Date: June 30, 20XX

#### **Project Overview**

The Upstream Investments Policy (hereinafter “Upstream Investments”) is an initiative sponsored by the County of Sonoma Board of Supervisors, which began in 2007 as a response to the trend of increasing criminal justice costs. The initiative is staffed by the Human Services Department (HSD). The “downstream vision” is: “in Sonoma County, poverty is eliminated and all people have an equal opportunity for quality education and good health in nurturing home and community environments.” The mission is that “all residents of Sonoma County will benefit from prevention-focused policies and interventions that increase equality and reduce monetary and societal costs.”

Community leaders helped develop four goals to guide the work of Upstream Investments:

**Goal 1:** The whole community is engaged in supporting the healthy development of children.

**Goal 2:** Community members have access to education and training and are adequately prepared for the challenges of the future.

**Goal 3:** All community members are well sheltered, safe, and socially supported.

**Goal 4:** Sonoma County has a thriving diverse economy that produces economic security for all.

In addition, the community selected 22 community-level indicators of success which compliment or overlap with the Health Action indicators.

In 2015, a half-time HSD staff position was created to support capacity development for local programs seeking to align outcomes with Upstream Investments. The goal in bolstering the capacity of local programs is to help measure and improve outcomes at the program level, which will ultimate impact community outcomes.

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While Upstream Investments is not a program itself, HSD Upstream Investment staff provides local programs technical assistance in developing logic models, conducting literature reviews, and creating evaluation plans. Beginning in 2015, HSD purchased an on-line data system called “Apricot”, which is used in tracking and analyzing data for the Shared Outcomes Measurement focus of Upstream Investments. The HSD Upstream Investments staff person serves as the Administrator for the Apricot system, which holds the data for several County collaboratives including the Keeping Kids in School case management data sets and the READY program assessment data sets. Therefore, HSD Upstream Investments staff (and HSD Information Technology staff) have access to all data entered into the Apricot system. In addition, contractors hired by HSD to provide the database system or to customize the tools also have access to the data and these contracts include strict confidentiality provisions.

#### **Data Shared *by* School District**

Data shared by the School District with Probation’s Keeping Kids in School program (see Exhibit C) and with the READY program (see Exhibit B) will be entered into the Apricot database administered by HSD Upstream Investments staff.

#### **Data Shared *to* School District**

HSD Upstream Investments staff will share any analyzed aggregate data back with the School District for use in the Local Control Accountability Plans (LCAP) outcome measurement. HSD and the School District developed an MOU for the duration of December 1, 2015 – October 1, 2017 entitled “Partnering to Build a High Performing Culture of Equity Through Data-Driven Decision Making.” Data shared back with the School District will meet the goals of this MOU as well.

#### **Planned Usage of Data**

Aggregates of these data, *with all identifiers removed*, may be shared with the Board of State and Community Corrections (the agency administering the Justice Assistance Grants), Santa Rosa City School District and other Sonoma County school districts, Sonoma County Board of Supervisors, members of the Upstream Investment Initiative, and other local collaborative groups when Human Services deems it important and relevant for shared outcomes and grant reporting, directing and developing resources, refining existing programs, and encouraging county-wide collaborations and linkages.

#### **Provisions of Confidentiality**

HSD certifies that all HSD Upstream Investments and Information Technology staff and contracted partners ensure the confidentiality of information obtained from the School District through the following activities:

- The original copy of the data (which may be shared on a physical device such as a flash drive) or any hard copy printout of the data must be stored in a locked drawer or file cabinet while not being referenced by evaluators, case managers or other appropriate staff. Printed information that is no longer needed will be destroyed. Printouts of data from the schools or school district are not to be distributed to anyone outside of project personnel. Project personnel include HSD staff who manage the on-line database.
- All Pupil Records will be destroyed when the information is no longer needed for the purposes of this project.
- Organizational or institutional penalties for the misuse of confidential data and breach of confidentiality by staff exist, are available in writing, and are enforced.
- Specific sanctions for confidentiality violation can be imposed that include employee disciplinary action and any of the following: remedial training in confidentiality, loss of certification of competency in confidentiality, prohibition from future work with confidential data at the institution, discharge
- Users of the on-line database are authenticated by means of passwords or digital ID.
- Access to the on-line database is controlled by means of role-based authentication/access. Additionally, access to data files are restricted to specific project staff and access by non-project staff is not permitted.
- There is an audit trail that documents who, when, and for what purpose data is accessed via the on-line database.
- Any security, data breach, loss or theft gets reported to [HSD-IT@schsd.org](mailto:HSD-IT@schsd.org), 707-565-5867 option #1. The process for addressing the incident includes:
  - a. HSD IT Helpdesk will formally log the call;
  - b. HSD IT will contact and notify interested parties (State, Fed, County, HSD Executive Management, etc.) along with HSD-IT Management; and
  - c. HSD-IT Management will review incident and implement a remediation plan.

**Exhibit B:**  
**Cradle to Career**

**Project Name:** Cradle to Career

**County Agency Lead:** Department of Health Services (DHS), Health Policy Planning and Evaluation (HPPE) Division, including First 5 Sonoma County.

Other County Agencies with whom data will be shared: Department of Human Services (HSD), Upstream Investment Initiative

**Timeframe for sharing and analyzing of data:**

Start Date: July 1, 20XX

End Date: June 30, 20XX

**Project Overview**

Cradle to Career Sonoma County is a historic partnership that connects all segments of the educational continuum – early childhood, TK-12, college/technical training, careers – with broad community support to improve the educational, economic, and health outcomes for all Sonoma County youth. Cradle to Career Sonoma County engages community partners to coordinate and align the education efforts and resources in Sonoma County to ensure that all of our youth are prepared to succeed.

Cradle to Career is interested in accessing data routinely collected through TK-12 school district records in order to evaluate the effectiveness of community programming and supports provided to children and families along the educational continuum. Sharing of data will enable Cradle to Career to conduct evaluation activities to understand the long term impact of program investments and other services on children’s educational outcomes. This information can guide the work of Cradle to Career members to better support the success of all youth. Cradle to Career outlines the following three goals to benefit children and youth and the communities in which they reside:

**Participant Goals**

1. Every Child Enters Kindergarten Ready to Succeed
2. The Academic Success of Every Child is Supported In and Out of School
3. Every Young Adult is Prepared for and Completes the Highest Level of Postsecondary Education or Training to Achieve their Career Goals

Cradle to Career’s READY Project



In particular to Cradle to Career Goal 1: Every child enters kindergarten ready to succeed, the HSD, in partnership with DHS and participating Sonoma County school districts, has been conducting an ongoing annual evaluation to assess the impact of quality preschool on kindergarten school readiness and other long-term outcomes.

This evaluation is part of First 5 Sonoma County's grant to HSD for the Road to the Early Achievement and Development of Youth (READY) project, which has three main components: 1) improving the quality of early education programs; 2) supporting communities to strengthen the links between early education programs and the TK/K-12 school system; and 3) conducting a standardized kindergarten readiness evaluation. The purpose of the third component of READY, conducting a standardized kindergarten readiness evaluation, is to document changes in the percentage of Sonoma County children that enter kindergarten ready to learn, and to understand how quality preschool affects children's kindergarten readiness, especially for children from low-income high-needs communities.

The standardized kindergarten readiness evaluation involves administering an approximately 20 question parent survey to the parents of incoming kindergarten students, and having kindergarten, and in some cases-at the district's discretion-transitional kindergarten teachers complete the kindergarten student entrance profile (KSEP) observational screening tool during the first three weeks of school to provide a high-level overview of a child's school readiness on two domains: social-emotional readiness and cognitive readiness. While teachers are responsible to complete the 12 item KSEP observational screening tool for each student, there is some demographic and school/district related data routinely collected by schools that will be shared via this data sharing agreement. Specific data elements that will be shared by school districts as part of the READY evaluation are outlined in the table below.

#### **Data Shared by School District**

The following data elements are requested for evaluation purposes:

<b>Data Element</b>	<b>Data Level</b>	<b>Frequency</b>	<b>Rationale for Using Data</b>
State student ID	Individual	Annually each August for prior and current school year	Needed for data matching with California Healthy Kids Survey Data and for READY evaluation.
Name (last, first, middle)	Individual	Annually each August for prior and current school year	Required for data matching purposes to determine community programs/supports enrolled in for evaluation purposes and for READY evaluation.

Data Element	Data Level	Frequency	Rationale for Using Data
District	Individual	Annually each August for prior and current school year	Describe evaluation results at district level and for READY evaluation.
School	Individual	Annually each August for prior and current school year	Describe evaluation results at school level and for READY evaluation.
Grade	Individual	Annually each August for prior and current school year	Describe evaluation results by grade and for READY evaluation.
School student attended in Kindergarten	Individual For all elementary students (any grade)	Annually each August for prior school year	<i>Goal 1: Every Child Enters Kindergarten Ready to Succeed</i> outcome:  School name needed for matching with existing school readiness data
Retention for Kindergarten	Individual For all elementary students K and up (any grade) (y/n)	Annually each August for prior school year	<i>Goal 1: Every Child Enters Kindergarten Ready to Succeed</i> outcome:  Retention is one indicator of Kindergarten Readiness. The effectiveness of 0-5 investments in reducing rates of retention will be evaluated.
School enrollment date	Individual	Annually each August for prior school year	This variable will assist with understanding the length of time a student was present at each school for data matching purposes
School exit/transfer date	Individual	Annually each August for prior school year	This variable will assist with understanding the length of time a student was present at each school for data matching purposes
Gender	Individual	Annually each August for prior and current school year	Needed for understanding what disparities are present in opportunities for success and for READY evaluation.

Data Element	Data Level	Frequency	Rationale for Using Data
DOB	Individual	Annually each August for prior and current school year	Needed for calculating age and for data matching purposes and for READY evaluation.
Ethnicity and race variables	Individual (Will need coding details)	Annually each August for prior and current school year	Needed for understanding what disparities are present in opportunities for success and for READY evaluation.
FRL designation	Individual	Annually each August for prior and current school year	Proxy for socioeconomic status. Used for READY evaluation.
Parent Education Level	Individual  High school diploma completion status of both parents	Annually each August for prior and current school year	Parents' education level has been strongly tied to school success in prior research. This variable allows exploration of factors related to student resiliency/success despite lower parent education levels. Used for READY evaluation.
IEP Status	Individual  All grades	Annually each August for prior and current school year	Variable is important for understanding the impact of early intervention and education programs prior to school entry. Used for READY evaluation.
ELL designation	Individual	Annually each August for prior and current school year	Needed for understanding what disparities are present in opportunities for success. Used for READY evaluation.
ELL re-designation	Individual  Include dates	Annually each August for prior school year	Needed for understanding what disparities are present in opportunities for success
Attendance	Individual  Specified as the * number of days absent completely and for secondary level sites include * the number of days with at least one	Annually each August for prior school year	<i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i> contributing indicator is “% of students who miss 10% or more of school each academic year for any reason (chronic absenteeism)”

Data Element	Data Level	Frequency	Rationale for Using Data
	<p>cut class (include both excused and unexcused). Also include number of days attended. Will need a school year calendar to calculate 'days possible'</p> <p>(Note: this variable may be modified as we will be aligning our data request to align with that of Keeping Kids In School)</p>		
Expected graduation year	Individual	Annually each August for prior school year	High School Graduation is an outcome of <i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i>
DIBELS test scores	<p>Individual</p> <p>Through grade 6 for all time points assessed "Status" (not score) of DIBELS measures being assessed:</p> <ul style="list-style-type: none"> <li>• Initial Sounds Fluency (ISF)</li> <li>• Phoneme Segmentation Fluency (PSF)</li> <li>• Nonsense Word Fluency (NWF)</li> <li>• Oral Reading Fluency (ORF)</li> <li>• Retell Fluency (RTF)</li> </ul> <p>Status is based on score and includes: 1) "at risk," "some risk," and "low risk"; or 2) "deficit," "emerging," "established."</p>	Annually each August for prior school year	DIBELS scores provide an earlier benchmark for language development than CAASPP scores. Language and literacy levels are early indicators of later school success. It is of interest to Cradle to Career (Goal 1) to understand how 0-5 programming impacts early language and literacy.

Data Element	Data Level	Frequency	Rationale for Using Data
CELDT scores	Individual  Requesting performance levels (beginning, early intermediate, intermediate, early advanced, advanced) across four domains: listening, speaking, reading, and writing	Annually each August for prior school year	Of interest for understanding the language and literacy development of dual language learners and how supports offered before and after school entry may impact this development.
MAP and/or other district-specific test scores	Individual  Through grade 8 only	Annually each August for prior school year	<i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i> indicator of academic success
Math and ELA CAASPP scaled scores	Individual  Grades 2-12	Annually each August for prior school year	<i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i> indicator of academic success
SAT scores	Individual: 12 <sup>th</sup> grade only (data requested for seniors, even if students took the test in the 11 <sup>th</sup> grade)	Annually each August for prior school year	<i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i> indicator of academic success and preparedness for postsecondary education
ACT scores	Individual	Annually each August for prior school year	<i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i> indicator of academic success and preparedness for postsecondary education
CAHSEE	Individual  10 <sup>th</sup> through 12 <sup>th</sup> grade only (including whether the student has passed in any earlier grade)	Annually each August for prior school year	<i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i> indicator of academic success
Realized graduation year	Individual  High school only	Annually each August for prior school year	Monitor <i>Goal 2: The Academic Success of Every Child is Supported In</i>

Data Element	Data Level	Frequency	Rationale for Using Data
			<i>and Out of School</i> outcome: High school graduation
Overall GPA	Individual Grades 6-12	Annually each August for prior school year	<i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i> indicator of academic success
Individual courses completed	Individual  Grades 6-12. All completed courses for the past school year, including final grades, and pass/no pass. We will also require site catalogues that designate specific courses as fulfilling A-G requirements for the concurrent school year. We will code the courses to create indicators for A-G enrollment	Annually each August for prior school year	Monitor <i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i> contributing indicator: % of students completing A-G requirements
8 <sup>th</sup> Grade Algebra Status (passed, not passed)	Grades 8-12 (if separate field from above)	Annually each August for prior school year	Monitor <i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i> contributing indicator: 8 <sup>th</sup> Grade Math
A-G complete	If available as one variable, grade 12 only	Annually each August for prior school year	Monitor <i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i> contributing indicator: % of students completing A-G requirements

Data Element	Data Level	Frequency	Rationale for Using Data
Student suspension and expulsion data	Individual	Annually each August for prior school year	Monitor <i>Goal 2: The Academic Success of Every Child is Supported In and Out of School</i> contributing indicator: % of unduplicated count of students suspended or expelled from school
FAFSA completion (if data is available)	Individually Indicate whether or not parent has completed an application	Annually each August for prior school year	Monitor <i>Goal 3: Every Young Adult is Prepared for and Completes the Highest Level of Postsecondary Education or Training to Achieve their Career Goals</i>  Indicator: % of parents completing the Free Application for Federal Student Aid (FAFSA)
Postsecondary enrollment	Individually	Annually each August for prior school year	<i>Goal 3: Every Young Adult is Prepared for and Completes the Highest Level of Postsecondary Education or Training to Achieve their Career Goals</i>  Variable is important to understand impacts of Early Care and Education and K-12 education.  Indicator: % of students enrolling in postsecondary education
Postsecondary Completion	Individually	Annually each August for prior school year	<i>Goal 3: Every Young Adult is Prepared for and Completes the Highest Level of Postsecondary Education or Training to Achieve their Career Goals</i>  Variable is important to understand impacts of Early Care and Education and K-12 education.  Indicator: % of students completing postsecondary education

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**Planned Usage of Data**

Designated Cradle to Career DHS and HSD staff would utilize the data to monitor progress toward Goals 1 - 3. The data would be solely managed by DHS Health Policy Planning and Evaluation division evaluators/epidemiologists and/or contracted DHS evaluators. The only exceptions are READY evaluation data elements, which will be shared with HSD and managed in a secure password-protected, on-line data management system by the HSD READY evaluation team.

**Provisions of Confidentiality**

DHS and HSD certify that all Cradle to Career staff and partners ensure confidentiality through the following activities:

- The original copy of the data (which may be shared on a physical device such as a flash drive) or any hard copy printout of the data must be stored in a locked drawer or file cabinet while not being referenced by evaluators or other appropriate staff. Printed information that is no longer needed will be destroyed. Printouts of de-identified data from the schools or school district are not to be distributed to anyone outside of project personnel and school districts. Aggregate data related to Cradle to Career outcomes can be shared with Cradle to Career partners.
- Project personnel include Department of Health Services, Health Policy Planning and Evaluation division evaluators/epidemiologists and/or contracted DHS evaluators.
- Cradle to Career partners wishing to utilize the data must submit a formal request to DHS for data use. The DHS evaluation team will provide data matching assistance and send the agency back a de-identified file to analyze or will complete the analyses for the agency, depending on the capacity of the agency to conduct its own analyses. No student names or identifiers will be disclosed to agencies outside of DHS and HSD or the school districts.
- All Pupil Records will be destroyed when the information is no longer needed for the purposes of this project.
- Any security, data breach, loss or theft is to be reported by the School District to [HSD-IT@schsd.org](mailto:HSD-IT@schsd.org), 707-565-5867 option #1. The process for addressing the incident includes:
  - d. HSD IT Helpdesk will formally log the call;



- e. HSD IT will contact and notify interested parties, as required (State, Fed, County, HSD Executive Management, etc.) along with HSD-IT Management;
- f. HSD-IT Management will review incident and implement a remediation plan; and,
- Any security, data breach, loss or theft is to be reported to District Superintendent at (707) 890-3800 within 24 hours.

**Exhibit C:**

**Keeping Kids in School**

**Project Name:** Keeping Kids in School

**County Agency Lead:** Probation Department

**Timeframe for the analysis of the data:**

Start Date: July 1, 20XX

End Date: June 30, 20XX

**Project Overview**

Keeping Kids in School (KKIS) is a collaboration between Sonoma County school districts, service providers and others to identify and provide services to students experiencing school attendance problems and their families, with the goal of improving attendance and increasing connection to education through collaborative case management.

Data shared under this MOU will be used for ongoing case coordination such as student assessments, action and transition planning, and referrals for services. Data will also be used to conduct a process and outcome evaluation as defined in the Keeping Kids in School Local Evaluation Plan (LEP). The LEP outlines the following expected outcomes as benefits to the participants and communities in which they reside:

**Participant Goals**

1. Reduction in the incidence of school absence and truancy for at risk students in Sonoma County;
2. Increase in student and parent engagement with school;
3. Improvements in participant educational outcomes;
4. Improvements in the functioning of participant families; and
5. Reductions in participant involvement in criminal activity.

**Community Goals**

1. Reduction of negative impacts upon community that result from chronic absence and truancy;
2. School districts experience increased revenue as a result of reduced student absence;
3. Increased school district revenue provides for sustainability of chronic absence/truancy prevention efforts.

**Data Shared *by* School District**

The following data elements are necessary for ongoing case coordination and evaluation purposes. Probation will provide student name(s) and request the following data points for the student.

Data Element	Data Level	Frequency	Rationale for Using Data	Rationale for Using Data
			<i>Case Coordination</i>	<i>Evaluation</i>
Student Attendance Records	KKIS participants	As requested by case managers or Probation Department staff  Typically ongoing collection by case managers and quarterly collection by the Probation Department	To track the historic and ongoing daily attendance of KKIS participants to determine student progress, the effectiveness of program services, and to facilitate ongoing case-coordination	To evaluate the following expected participant outcome:  <i>Reduction in the incidence of school absence and truancy for at risk students in Sonoma County</i>

Grade Records	KKIS participants	As requested by case managers or Probation Department staff  Typically collected twice during a reporting period: progress report and grade report (or whatever reports are typical for the student's enrolled school)	To track the academic history and progress of KKIS participants to determine student progress, the effectiveness of program services, and to facilitate ongoing case-coordination	To evaluate the following expected participant outcome:  <i>Improvements in participant educational outcomes</i>
Discipline Records	KKIS Participants	As requested by case managers or Probation Department staff  Typically collected twice during a grade reporting period	A data point used to measure student engagement history and progress of KKIS participants to determine student progress and effectiveness of program services and to facilitate ongoing case-coordination	To evaluate the following expected participant outcomes:  <i>Increase in student and parent engagement with school</i>
Available School-wide Attendance Data  <i>(Average Daily Attendance, Chronic Absentee Rate,</i>	School	Collected once for the 14-15 school year and on an ongoing bases in time intervals available via KKIS	To inform the understanding of school-wide needs for the allocation of KKIS resources	To inform the evaluation of the following expected community outcome:  <i>Reduction of negative impacts upon community that result</i>

<i>Chronic Truancy Rate, Truancy Rate, etc.)</i>		site data systems (preferably once for the middle and end of each school year)		<i>from chronic absence and truancy</i>  <i>School districts experience increased revenue as a result of reduced student absence</i>
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#### **Data Shared to School District**

The following data elements are necessary for ongoing case coordination and evaluation purposes and authorized under Sonoma County Standing Order No. 2015 (1) issued on December 31, 2015. As stated in this Standing Order, only information that is relevant to the treatment and services available to the minor through the program will be disseminated beyond the Student Attendance Team lead (assigned case manager).

<b>Data Element</b>	<b>Data Level</b>	<b>Frequency</b>	<b>Rationale for Using Data</b> <i>Case Coordination</i>	<b>Rationale for Using Data</b> <i>Evaluation</i>
Juvenile Case File Information	KKIS Participants	As requested by the Student Attendance Team lead (assigned case manager)	To facilitate ongoing case coordination and determine the effectiveness of program services	To evaluate the following expected participant outcome:  <i>Reductions in the participant involvement in criminal activity</i>

#### **Planned Usage of Data**

1. Probation Department: As the lead agency in charge of fiscal and administrative oversight of the KKIS project, the Probation Department will use data to guide program oversight, development, refinement, and sustainability purposes. De-identified data will

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also be used for progress and summary report requirements for the Justice Assistance Grant.

2. KKIS Partners:

- a. Seneca Family of Agencies (Seneca) – contracted with the Probation Department to provide case management services to students referred to KKIS. Data will be used by case managers and other Seneca staff to conduct day-to-day case management services such as student assessments, action and transition planning, and referrals for services. Data will also be used to assess effectiveness of case management strategies to refine service delivery as needed.
  - b. WestEd – contracted with the Probation Department to conduct a process and outcome evaluation as defined in the Keeping Kids in School Local Evaluation Plan (LEP). De-identified data will be used by WestEd to carry out the requirements of the Local Evaluation Plan. De-identified data will also be used to compile reports and make recommendations for program design changes.
  - c. Human Services - will manage data from the KKIS project in the Apricot database, a cloud-based system for organizing case files and project data.
  - d. KKIS Student Attendance Teams – multi-disciplinary teams formed to support KKIS participants at KKIS school district sites may use data to facilitate ongoing case coordination and determine the effectiveness of program services.
3. Other: aggregates of these data, *with all identifiers removed*, may be shared with the Board of State and Community Corrections (the agency administering the Justice Assistance Grants), Santa Rosa City School District, Sonoma County Board of Supervisors, members of the Shared Outcome Measurement Committee, and other local collaborative groups when deemed important and relevant for grant reporting, directing and developing resources, refining existing programs, and encouraging county-wide collaborations and linkages.

### **Provisions of Confidentiality**

The Probation Department certifies that all KKIS project staff and contracted partners ensure the confidentiality of information obtained from the school districts through the following activities:

- The original copy of the data (which may be shared on a physical device such as a flash drive) or any hard copy printout of the data must be stored in a locked drawer or file cabinet while not being referenced by evaluators, case managers or other appropriate staff. Printed information that is no longer needed will be destroyed. Printouts of data from the schools or school district are not to be distributed to anyone outside of project

personnel. Project personnel include Human Services Department staff who will manage the on-line database.

- All Pupil Records will be destroyed when the information is no longer needed for the purposes of this project.
- Organizational or institutional penalties for the misuse of confidential data and breach of confidentiality by staff exist, are available in writing, and are enforced.
- Specific sanctions for confidentiality violation can be imposed that include employee disciplinary action and any of the following: remedial training in confidentiality, loss of certification of competency in confidentiality, prohibition from future work with confidential data at the institution, discharge
- Users of the Apricot cloud-based database are authenticated by means of passwords or digital ID.
- Access to the Apricot cloud-based database is controlled by means of role-based authentication/access. Additionally, access to data files are restricted to specific project staff and access by non-project staff is not permitted.
- There is an audit trail that documents who, when, and for what purpose data is accessed via the Apricot cloud-based database.
- All KKIS participants and/or families sign releases of information with both Seneca Family of Agencies and the Probation Department complying with all applicable state and federal privacy laws explaining the use of student record data.
- Any security, data breach, loss or theft gets reported to Santa Rosa City School District [rvandyke@srcs.k12.ca.us](mailto:rvandyke@srcs.k12.ca.us), 707-890-3800. The School District certifies that any information shared to the school districts under this MOU will remain confidential and any and all documents obtained pursuant to this order will be destroyed upon a minor's termination or graduation from the Keeping Kids in School project.