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**Testimony for the
Higher Education & Workforce Advancement Committee
From
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Connecticut Conference of Independent Colleges
February 17, 2011**

On behalf of the member institutions of the Connecticut Conference of Independent Colleges (CCIC), **I am submitting testimony on two bills before you today. While we are generally supportive of both of these bills, we do have some concerns.**

H.B. 6054: AN ACT CONCERNING THE TRACKING OF UNIQUE IDENTIFIERS BY INSTITUTIONS OF HIGHER EDUCATION.

This bill authorizes the Department of Higher Education to require public and private institutions of higher education to track the unique identifiers, assigned by the Department of Education to public school students, of all in-state students of such institution until such students graduate from or terminate enrollment at such institution. CCIC does not oppose this bill but has some concerns about its intent.

First, CCIC understands that the Department of Education has requested that school districts in the state include unique identifiers on student transcripts upon graduation. CCIC recommends that if this bill is to move forward, a provision be added to *require* that this action be taken by school districts in order to ensure that the higher education institutions have the information needed to implement successfully the provisions of this bill.

Second, CCIC has some concerns about the intent of this bill. While the language of the bill simply requires that the unique identifiers be tracked, the Statement of Purpose implies that more is intended. CCIC certainly understands the great need for more data at the postsecondary level to allow for informed decisions to be made about the changes needed in K-12 preparation. Additionally, because Connecticut residents comprise 42% of our students and we enroll 36% of all college students statewide, we think that having data from our students will enrich the effort. The sharing of student data at any level, however, causes privacy concerns. Along with that, private colleges and universities currently do not share the legal indemnity held by public colleges in the event of a data security breach.

The development of longitudinal student databases has been ongoing in most states but there has been little guidance until fairly recently as to what constitutes best practice in this area. In October 2009, the Center on Law and Information Policy of Fordham Law School released the seminal research on these databases.

The researchers reviewed the elements and security of each database in each state that had or was in the midst of creating one. They found that privacy protections for the longitudinal databases were lacking in the majority

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of states. Among other things, they found that most states collected information in excess of what is needed for the reporting requirements of the No Child Left Behind Act and what appeared needed to evaluate overall school progress. They observed that the majority of longitudinal databases examined held detailed information about each child in what appeared to be non-anonymous student records. The information collected included directory, demographic, disciplinary, academic, health, and family information.

They further found that, “given the detailed and sensitive nature of the information collected, the databases generally had weak privacy protections. Often the flow of information from the local educational agency to the state department of education was not in compliance with the privacy requirements of FERPA. Many states do not have clear access and use rules regarding the longitudinal database and over 80% of the states apparently fail to have data retention policies and are thus likely to hold student information indefinitely. Several states outsource the data warehouse without any protections for privacy in the vendor contract. “

The researchers recommend:

- Data at the state level should be anonymized through the use of dual database architectures;
- Third party processors of educational records should have comprehensive agreements that explicitly address privacy obligations;
- The collection of information by the state should be minimized and specifically tied to an articulated audit or evaluation purpose;
- Clear data retention policies should be instituted and made mandatory;
- Access and permissible use policies should be well articulated and specific in nature;
- Audit logs of access to and use of the state databases should be maintained as a guard against unauthorized data processing;
- Information about the database, its security, and its use should be readily available and verifiable.
- States should have a Chief Privacy Officer in the department of education who assures that privacy protections are implemented for any educational record database and who publicly reports privacy impact assessments for database programs, proposals, and vendor contracts.

Should further provisions be added that spell out how and by whom the data are to be used, we request that we have the opportunity to weigh in to ensure that the institutions we represent are able to participate in a way that adequately protects them and their students.

S.B. 927: AN ACT CONCERNING REQUIREMENTS FOR EARLY CHILDHOOD EDUCATORS.

This bill seeks to revise the staff qualification requirements for early childhood educators that work in state-supported preschool programs. Current law requires that by 2015, school readiness classrooms be staffed with teachers who either hold (1) a bachelor’s degree from an accredited higher education institution in early childhood, child development, or a related commissioner-approved field; or (2) a teaching certificate with a

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special education or early childhood endorsement. This bill seeks to revise these requirements so that by 2015, only *fifty-percent* of the staff in state-supported preschool classrooms must obtain these qualifications and the other fifty-percent must hold an associates degree in early childhood education, child study, childhood development or human growth and development.

The bill also requires that the Commissioner of Education use any unexpended school readiness funds to support local school readiness programs in satisfying the revised staff qualifications in the form of tuition assistance to staff members with a low family income, as determined by the Commissioners of Education and Higher Education, at a maximum of five thousand dollars per staff member per year for the cost of higher education courses leading to a bachelor's degree at a public institution of higher education in this state.

CCIC asks that this language be amended to allow school readiness staff to utilize the funds to pursue a bachelor's degree at either a public or private institution of higher education in this state. One of the primary reasons that early childhood educators in Connecticut have cited that the standard in current law cannot be reached is due to the insufficient numbers of four-year Early Childhood Education (ECE) degree programs. Therefore, if lawmakers want these goals to be reached, school readiness staff must be able to use the funds to obtain their degree at either a public or private higher education institution. **Of the six Connecticut Educator Preparation Programs in the state that provide certificates in early childhood education, half are at private colleges.** Moreover, a number of other private higher education institutions offer bachelors *and* associates degrees in early childhood education. While tuition at private universities may on average be higher than public universities, the school readiness staff who are eligible to receive this tuition assistance would also qualify for other financial aid that would allow them to enroll in these programs.