

# Making Data Requests

*A How NCLDS Works* Brief for NCLDS Contributors and Stakeholders

Enterprise Data Office

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## The *How NCLDS Works* Series

This brief is part of a series that provides details for North Carolina Longitudinal Data Service (NCLDS) users, NCLDS Data Contributors, and other stakeholders about how various technical and procedural aspects of NCLDS and the systems that contribute data to NCLDS work. The briefs focus on aspects that are not easily explained in a paragraph or two.

Each brief has been written in a way that we hope will make it accessible even to audiences without data, analysis, or technical backgrounds, but please share feedback with us about how we can make the briefs more accessible. We are also open to suggestions for other topics you would like to see covered. We can be reached at [nclsdshelp@nc.gov](mailto:nclsdshelp@nc.gov).

### Currently Available Briefs

- [Linking Data: eScholar Student UID](#)
- [Linking Data: NC eLink Entity Resolution](#)
- [Linking Data: Workforce Data](#)
- [Linking Data: Prospects for \*Ad Hoc\* Matching](#)
- Making Data Requests (this brief)
- [Reviewing and Approving Data Requests](#)

### Planned Briefs

- Common Elements across NCLDS Data Sources
- Data Availability and Use Guide
- Using the Public Version of the NCLDS Data Dictionary
- Fulfilling Data Requests
- Reviewing Products Created by External Partners with NCLDS Data
- Cross-Sector Governance of NCLDS
- Security and Privacy
- Creating Practitioner Portals
- Cross-Sector Learning Goals

# 1. Before You Make a Data Request: Welcome and Orientation

Thank you for your interest in requesting data via the North Carolina Longitudinal Data System's ([NCLDS](#)) Data Request Service. While every effort has been made to create a seamless and streamlined request process, the complexity of the different data privacy and security rules that govern the data available through NCLDS may make it challenging for a newcomer (or sometimes even a seasoned Data Requester) to prepare for what the data request process requires. This brief is your guide for navigating that process.

***Please read this entire brief before you begin your request.*** While some information for your request will not be needed until later stages of the process, it may take significant time for you to assemble the information (such as information about the security of the server where you plan to work with the data) or to review documentation (such as the required Data Use Agreement, which is a legal document), so preparing early for those later components can save you time.

Other important “to-dos” that will contribute to a smoother data request process:

- Continue to refer to this guide throughout the request process;
- Consider copying Tables 2.1 and 2.2 into a document or spreadsheet, inserting a blank column, and populating your answers in that column before you start to fill out the actual request forms;
- Take special note of all of the documentation and signatures you will need to collect, and begin working on gathering them early in your application process;
- Ensure that the information you submit is complete and accurate;
- Add [ncldshelp@nc.gov](mailto:ncldshelp@nc.gov) to your email contacts and ‘safe senders’ list;
- Prioritize research questions that are cross-sector in nature; and
- Think carefully about how each data element you request aligns with your research question(s) and be prepared to demonstrate that alignment as part of your data request.

## About NCLDS

Before you get started, if you are not already familiar with NCLDS, it may help you to understand a little bit about what NCLDS is and does. Simply put, NCLDS connects data from contributing state agencies and organizations across a variety of sectors, including early childhood, K12 education, postsecondary education, health and human services, and employment. NCLDS's Data Request Service supports practitioners and researchers by connecting them with the longitudinal data they need to address cross-sector [Learning Goals](#) under the guidance of a governance structure—developed by *all* of the Data Contributors—that protects the privacy and security of personal information. We encourage you to visit the [NCLDS](#)

[website](#), particularly our [FAQ page](#), for more information about NCLDS and our data privacy, security, linking, and sharing processes.

It is important to remember that NCLDS is a data *connector*, not a data owner: It links, de-identifies, and packages data from two or more contributing data owners, but it does not have constant access to those data. After a request for data is approved by *all* of the owners of the data included in the request, NCLDS prepares the data and then securely delivers the prepared data to the approved Data Requester. Requesters can come from a variety of backgrounds—they may be NCLDS data partners, other state entities, scholars, or practitioners—and their requests can be for many different purposes—including research, evaluation, decision-making, and reporting.

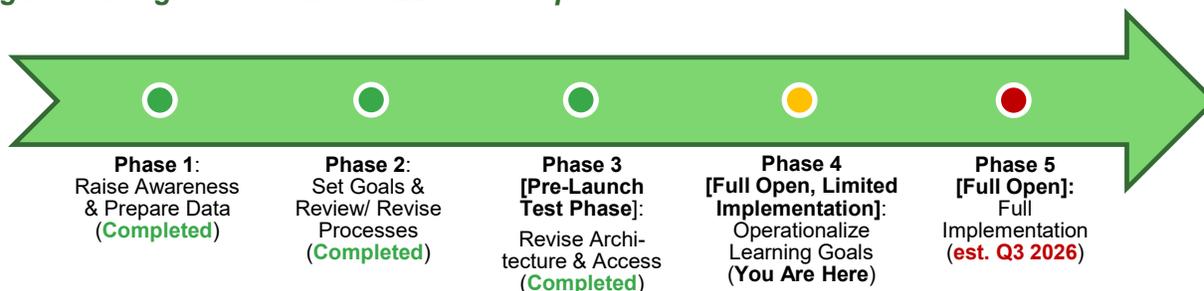
**A Note on Single-Source Data Requests**

Data Requesters seeking data from a single source (*i.e.*, data from only one of the state agencies or organizations that contribute data to NCLDS) should contact that specific Data Contributor to make a data request. NCLDS currently facilitates only the preparation of data from two or more contributing agencies or organizations and does not yet provide single-source data request services.

**Current NCLDS Phase: Full Open with Limited Implementation**

NCLDS is nearing its final Full Open phase, when the Data Request Service will guide data requests through an automated request, approval, packaging, and secure delivery process (see Figure 1 for a timeline of NCLDS progress toward Full Open). Because the current phase (Full Open with Limited Implementation) does not yet benefit from this automation, NCLDS is managing and fulfilling requests manually. As a result, NCLDS is able to provide all of its planned Full Open services, but **only for a limited number of data requests**, to ensure that Data Contributors and NCLDS staff have the time needed to work together closely to **manually facilitate each step** of the data request process. This brief provides guidance for making data requests during this Limited Implementation phase. The [NCLDS website](#) includes additional information about other Service limitations during this phase (including the total number of requests NCLDS will be able to process in 2025 and 2026).

**Figure 1: Progress Toward NCLDS Full Implementation**



## Prospects for Full Open with Full Implementation

Once NCLDS's automated data request tool is available (projected availability: Q3 2026), NCLDS will enter its final Full Open (Full Implementation) phase by removing the limit on the number of requests it can fulfill annual, and this brief will be updated with information about the automated process. Furthermore, as NCLDS grows, it will provide services in addition to fulfillment of requests for custom datasets, including:

- **Research-Ready Datasets:** Pre-prepared, record-level (individual-level), de-identified, linkable datasets from NCLDS Data Contributors that comprise their most frequently requested data elements;
- **Data Portals for Practitioners:** Special cross-sector, longitudinal data products tailor-made for educators and other practitioners, accessible only via a secure portal to protect data privacy and security; and
- **Aggregated Data:** Cross-sector data tables and visualizations at levels of aggregation that mask individual data and therefore allow for unrestricted, public sharing.

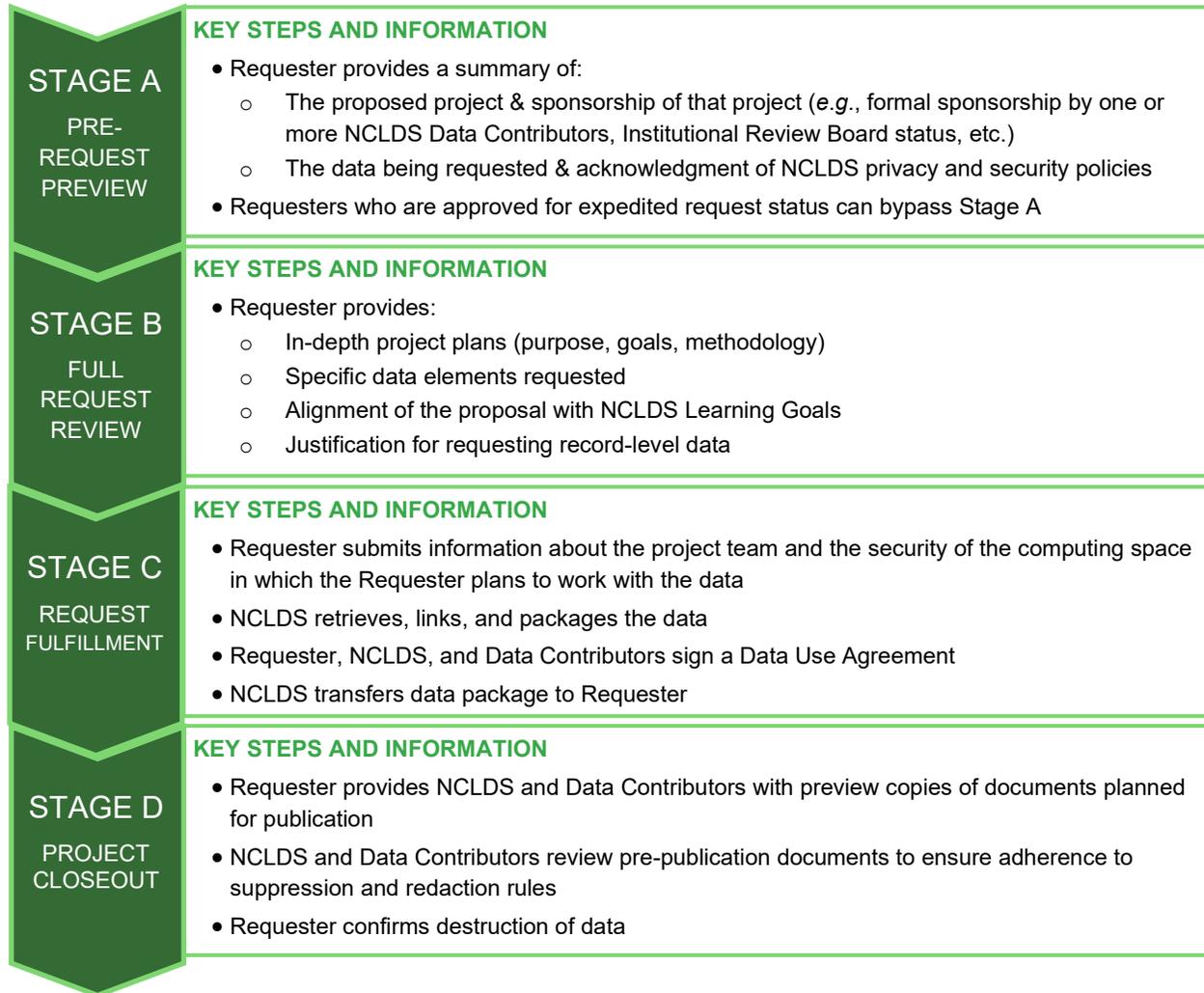
## 2. Stages of the Data Request Process

An NCLDS data request begins when a Data Requester completes an online data request form, which NCLDS then shepherds through a **multi-stage request review and data packaging process**. Data Requesters receive updates from NCLDS via e-mail about the progress of their request as it passes through each review stage. This brief focuses on the first three stages only (A, B, and the first part of C), but Figure 2 (page 6) outlines the entire NCLDS data request review, approval, and fulfillment process. Future *How NCLDS Works* briefs will provide more details about the stages of the process not covered in this brief.

The NCLDS team and Data Contributors collaborate throughout the data request review and data packaging process, and the first two stages of the process—the request review stages—include several decision points for each Data Contributor involved in your request. Depending on the complexity of your request, the number of Data Contributors involved, and the permissions needed to access the specific data elements you are requesting, **be prepared for this process to take a significant amount of time**.

As indicated in Figure 2, certain Data Requesters—including state leaders and policymakers and designated employees of NCLDS Data Contributors—may be eligible for an **expedited review process**, explained in more detail in the following section.

**Figure 2: Data Request Process Stages and Key Steps**



**Expedited Review Process**

There are three situations in which the NCLDS team and Data Contributors may be able to work with a Data Requester to expedite the data request process.

1. **Members of certain state governing bodies** already meet requirements reviewed during Stage A and can request direct access to the Stage B request form by contacting the Request Manager at [nclsdshelp@nc.gov](mailto:nclsdshelp@nc.gov). These include:
  - **North Carolina General Assembly members and designees** working directly on their behalf;
  - **The Governor's Office, the Education Cabinet, and designees** working directly on their behalf; and
  - **Council of State members and designees** working directly on their behalf.

2. **Individuals designated by NCLDS Data Contributors as having direct affiliation with NCLDS work** already meet requirements reviewed during Stage A and can request direct access to the Stage B request form by contacting the Request Manager at [nclsdshelp@nc.gov](mailto:nclsdshelp@nc.gov). These include:
  - *Pre-designated* employees of Data Contributors with NCLDS-related data responsibilities; and
  - Third parties that have secured formal sponsorship for their proposed request from *all* impacted Data Contributors.
3. **Individuals making a request in response to a pressing, formally-identified state need that requires expedited processing** may be eligible for expedited review. If you believe your request meets this criterion, please send a written rationale (including summary information about the data needed) to [nclsdshelp@nc.gov](mailto:nclsdshelp@nc.gov) and a Request Manager will work with you and the relevant Data Contributors to determine the steps needed to review your request.

The rest of this brief provides a summary of the stages of the NCLDS data request review process and the information Data Requesters should be prepared to provide during each stage.

### **Stage A: Request Preview**

During Stage A, Data Requesters who do not qualify for Expedited Review provide high-level information about their project and their anticipated data needs. The goals of this stage are to orient Data Requesters to the expectations and requirements of NCLDS and its Data Contributors and to vet each request to ensure that Requesters are likely to be eligible to receive the data they seek.

**Data Requesters should expect to invest a significant amount of time gathering and preparing the information needed to complete this initial phase of the request process.**

To support you, we have outlined the information you will need to complete Stage A—along with several notes, tips, and best practices we believe may be helpful to you—in Table 2.1 (pages 8-9). We recommend organizing this information in a single document (see the **Navigating the Data Request Form** section on page 18 for more details) before you complete the Stage A request form. We also recommend adding the Request Manager email, [nclsdshelp@nc.gov](mailto:nclsdshelp@nc.gov), to your email contacts to ensure communication from NCLDS is properly routed to your inbox.

**Table 2.1: Information Data Requesters Provide During Stage A**

Requested Information	Notes, Tips, and Best Practices
<p><b>Contact information for the Project Owner (and Requester, if different from the Project Owner)</b></p> <p><i>Name, title, phone number, e-mail address, and mailing address</i></p>	<p>The Project Owner is the person who is responsible for managing the data request and for working with NCLDS. In most cases, the Project Owner will be the person submitting the data request and will only need to provide one set of contact information. If a person other than the Project Owner is submitting the request on the Project Owner’s behalf, contact information for that person should be provided as well. <b>Note:</b> You can designate a <b>Co-Requester</b> (someone who can share decision-making about the request) in Stage B.</p>
<p><b>Basic information about the organization or institution making the request</b></p> <p><i>Organization/institution name and type</i></p>	<p>In addition to your organization’s or institution’s name, indicate the <i>type</i> of organization or institution for which you work (e.g., an Institution of Higher Education [IHE], a research group not affiliated with an IHE, a state or local government agency, a non-agency branch of state government, etc.).</p>
<p><b>Your status as a student/post-doctoral researcher, and contact information for your Faculty Sponsor (if applicable)</b></p> <p><i>Sponsor name, title, phone number, and e-mail address</i></p>	<p>If you are a student or a post-doctoral researcher, please indicate at what level you are enrolled (e.g., high school, undergraduate, graduate, doctoral, or post-doctoral). <b>Also, please provide contact information for a Faculty Sponsor (required).</b></p>
<p><b>Whether your data request has a formal sponsor affiliated with one or more of our Contributing Agencies and, if so, contact information for the representative(s) formally sponsoring your request</b></p> <p><i>Name(s), title(s), and e-mail address(es) for any formal sponsors</i></p>	<p>Formal sponsorship is <u>not</u> required by most NCLDS Data Contributors, but it <u>is</u> <b>required by the North Carolina Department of Public Instruction (NCDPI) for any request that includes NCDPI data.</b> Please contact Diane Dulaney (<a href="mailto:diane.dulaney@dpi.nc.gov">diane.dulaney@dpi.nc.gov</a>) for more information about NCDPI sponsorship. While not required for a request that does not include NCDPI data, securing sponsorship from representatives of other organizations and agencies that hold data relevant to your request may strengthen your overall application. <b>Please note:</b> Because the NCLDS request process includes multiple opportunities for Data Contributors to ask for clarification of a request, and because Requesters have the option to seek sponsorship from Contributors, <b>there is no formal appeal process for a formally denied request.</b> We strongly recommend identifying a champion at each Contributing Agency that holds the data in which you are interested.</p>

Requested Information	Notes, Tips, and Best Practices
<p><b>Whether you have applied for IRB approval to conduct your research (if applicable) and, if so, the status of your IRB application</b></p>	<p>Institutional Review Board (IRB)<sup>1</sup> approval is a requirement for many forms of research conducted by postsecondary researchers, physicians, and others who work with sensitive data. If IRB approval is required by your institution or organization, please be prepared to provide NCLDS with information about the status of your IRB application. In addition, be aware that some of NCLDS’s Data Contributors may require evidence of IRB approval, even if your institution or organization does not have an IRB process. In those cases, you may have to contract the services of an external or commercial IRB.</p>
<p><b>A title and short summary of your proposed project</b></p>	<p>Provide a short project title, a more detailed project title, and a brief abstract/summary-level description (no more than 500 words) of your proposed project. Your summary should include information about how you plan to use the data you will request.</p>
<p><b>High-level information about the data you plan to request</b></p> <p><i>Associated Data Contributors and the level(s) of data you seek</i></p>	<p>Identify the specific agencies and/or organizations/units from which you plan to request data (please see the <a href="#">NCLDS Data Dictionary</a> for information about data availability) and the level(s) of data you seek (your request can be for aggregated data or de-identified record-level data [or both]).<sup>2</sup></p>
<p><b>Acknowledgment that you have reviewed and understand the NCLDS Privacy and Security Policies</b></p>	<p>Before submitting your Stage A request form, please engage all of the members of your project team and anyone else at your organization or institution who will be impacted by your request to discuss your project and ensure they are aware of your data request and of the <a href="#">NCLDS Privacy and Security policies</a>. Depending upon your organization/institution’s structure, you may need to include leaders who understand and can attest to the security of your existing systems for receiving, transmitting, and storing data (e.g., your Data Security Officer), legal counsel who may be involved in reviewing and signing off on future data use agreements, etc. If you have questions about any of these policies, please reach out to the Request Manager at <a href="mailto:nclsdshelp@nc.gov">nclsdshelp@nc.gov</a>.</p>

<sup>1</sup> To learn more about IRBs and what they do, visit [this Department of Health and Human Services site](#).

<sup>2</sup> **Note:** Requests that do not require linking services will receive lower priority (since those data can be requested directly from each Data Contributor separately).

After submitting the Stage A form, Data Requesters will receive an e-mail from NCLDS within five business days acknowledging our receipt of your form. Members of our team will review your request and may contact you with questions or to seek additional information. Once our administrators determine that your Stage A request is complete and that you are eligible to request the data you have identified, it then will be shared with each Data Contributor associated with your request.

Before you can move to Stage B of the request process, **all Data Contributors** who will provide data for your request (if approved) must approve your Stage A request.

*If all associated Data Contributors approve your Stage A request,<sup>3</sup> you will receive additional information and instructions by e-mail from an NCLDS administrator about how to complete Stage B of the data request. If at any step in the review process your request is not approved by NCLDS and/or our Data Contributors, you will receive feedback from our team about why your request was not approved. You may revise and re-submit a declined Stage A request.*

### Stage B: Full Request Review

When all associated Data Contributors have reviewed and approved your Stage A request—or if you are a Data Requester who meets the eligibility criteria for expedited review outlined earlier in this brief—you will be contacted by an NCLDS administrator and sent a link to complete the Stage B request form. **The goal of Stage B is to gather more detailed information about your proposed project**, including formal documentation of any specific sponsorships and/or approvals you may have secured in preparation for your request.

If you completed the Stage A request form (*i.e.*, if your request was not expedited), you will notice that several of the same questions are included as part of the Stage B request process. Our team will provide you with a copy of your Stage A responses, and you are welcome to copy and paste (or revise and update) your responses in the Stage B form.

Table 2.2 (pages 11-14) includes guidance for completing each section of the Stage B form.

#### Our Data Contributor Reviewers

Representatives from each Data Contributor associated with your request will review your proposed project and provide feedback. Reviewers from our Data Contributors include subject matter experts (including people with knowledge of the questions and issues of importance to each Contributor), people with knowledge of the data being requested (including knowledge of Contributor- and data-specific data-sharing and/or data-matching restrictions), legal consultants, research and evaluation methodology specialists, and data privacy and security experts.

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<sup>3</sup> NCLDS has published a [companion brief](#) with additional information about our request review and approval process.

**Table 2.2: Information Data Requesters Provide During Stage B**

Requested Information	Notes, Tips, and Best Practices
<p><b>Project personnel and their contact information</b></p> <p><i>Their names, titles, roles within your project, and e-mail addresses</i></p>	<p>Any members of your team who will have access to the data you are requesting are considered project personnel. NCLDS will reach out to everyone on your list to complete a Project Personnel Agreement (PPA; more information about the PPA is included at the end of this brief. This list must be updated throughout the life of your project, and personnel changes should be submitted in writing to the NCLDS Request Manager via e-mail (<a href="mailto:nclsdshelp@nc.gov">nclsdshelp@nc.gov</a>). <b>Note:</b> If you have a <b>Co-Requester</b> (someone who can share decision-making about the request), identify that person here by adding “Co-Requester” in front of her or his name .</p>
<p><b>Information about whether you or your organization are eligible to receive record-level wage data</b></p> <p><i><b>Note:</b> Only complete if you are requesting wage data; if you are not requesting wage data, select “N/A: This request does not include WAGE data”</i></p>	<p>This section helps NCLDS and Data Contributors determine whether you are eligible to work with wage data. Indicate under what definition the Data Requester or the organization on whose behalf the Requester is making this request is considered a public official, as defined by <a href="#">Code of Federal Regulations, Title 20, Chapter V, Part 603, Subpart A: 603.2(d)</a>. <b>Note:</b> NCLDS or the Department of Commerce may follow up with you to request documentation to support your assertion.</p>
<p><b>Formal documentation of faculty sponsorship, if applicable</b></p>	<p>At this stage, any Data Requester who identifies as a student or postdoctoral researcher and who has secured a formal Faculty Sponsor for the project will need to provide formal documentation of that sponsorship. Documentation may include a letter or e-mail from your Faculty Sponsor. Instructions are included in the Stage B request form for how to submit this documentation to NCLDS. If you are a student requester, your request will not move forward to review until you provide all required supporting documentation.</p>

Requested Information	Notes, Tips, and Best Practices
<p><b>Documentation of sponsorship(s) by one or more of our Contributing Agencies, if applicable</b></p>	<p>At this stage, any Data Requester who indicates that formal sponsorship from one or more of the NCLDS Contributing Agencies has been secured will need to provide formal documentation of each sponsorship. Documentation may include a letter or e-mail from a representative of the Contributing Agency indicating formal sponsorship. Instructions are included in the Stage B request form for how to submit this documentation to NCLDS. Your request will not move forward to review until you have provided all required supporting documentation. <b>As noted above, formal sponsorship from a North Carolina Department of Public Instruction (NCDPI) representative is required for any request that includes NCDPI data.</b> For more information about NCDPI sponsorship, contact Diane Dulaney (<a href="mailto:diane.dulaney@dpi.nc.gov">diane.dulaney@dpi.nc.gov</a>). <b>Also as noted above</b>, securing sponsorship from at least one Contributor is <b>strongly encouraged</b>, even when it is not required.</p>
<p><b>Documentation of your project's IRB status, if applicable</b></p>	<p>At this stage, any Data Requester who has secured or applied for IRB approval will need to provide formal documentation of the current status of the IRB application. Documentation may include a letter or e-mail verifying your project's current IRB status. Instructions are included in the Stage B request form for how to submit this documentation to NCLDS. If you are subject to IRB approval, or if a Data Contributor requires IRB approval, your request will not move forward to review until all you have provided all required supporting documentation.</p>

Requested Information	Notes, Tips, and Best Practices
<p><b>In-depth information about your project plans</b></p> <p><i>Your project title, the purpose(s) and goal(s) of your proposed project, your project's questions and the methodology you will use to answer them, and a project timeline</i></p>	<p>At this stage, Data Requesters should be prepared to provide an in-depth overview of their proposed project plans, including the project's title, the purpose(s) and goal(s) of the project, the specific questions they are seeking to answer, and their proposed methodology (including a detailed analysis plan for each question).<sup>4</sup> Requesters also are asked to provide a high-level project timeline outlining key deliverables and dates throughout the project period.</p> <p><b>Important:</b> Please number your project questions and keep track of your numbering. When you identify the specific data you need for your project, you will be required to indicate the question(s) the data will be used to address (see the next box for more information about this requirement).</p>
<p><b>Details about your proposed project's alignment with existing <a href="#">NCLDS Learning Goals</a> and other benefits of your project to the state</b></p>	<p>Describe which component(s) of the NCLDS Learning Goals, if any, are directly addressed by your proposed project, as well as the potential benefits of your project to the state of North Carolina (e.g., how the project will improve the education, health, and/or well-being of North Carolina students or citizens). While alignment with an NCLDS Learning Goal is not required, demonstrating this alignment will improve your likelihood for approval.</p>
<p><b>Details about your intended audience and publication plans</b></p>	<p>Indicate the specific audience(s) with whom you plan to share the results of your work, as well as any plans for publishing the results of this project.</p> <p><b>Important:</b> Please keep in mind as you complete this section that your Data Use Agreement with NCLDS and the Data Contributors will require you to share all materials intended for publication before they are released, both to ensure adherence to required suppression and redaction rules and to help you identify any data-related errors.</p>
<p><b>Confirmation of whether your project is statutorily or legislatively mandated and, if so, related details about that mandate</b></p>	<p>Evidence of a specific statute or other formal state or federal governmental action or order is not required for an NCLDS data request but could help expedite review of your request, if applicable.</p>

<sup>4</sup> As noted above for Stage A, requests that do not require linking services will receive the lowest priority (since those data can be requested directly from each Data Contributor separately).

Requested Information	Notes, Tips, and Best Practices
<b>Justification for your need for record-level data, if applicable</b>	NCLDS and its Contributors are committed to reducing the distribution of sensitive data to the minimum amount necessary to complete a project or task. Unless otherwise demonstrated clearly, your request will be assumed to require only aggregated data. To be considered for record-level data, you should be prepared to clearly demonstrate a need.
<b>For early childhood education, NCDPI, NCCCS, UNC, and NCICU data: Under what exception(s) to FERPA does your research or organization fall?</b>	Data Requesters requesting record-level public elementary, secondary, or postsecondary data must indicate the exception(s) to FERPA under which their research or organization falls, if the request includes data that are covered by FERPA. For a full list of data covered by FERPA [34 CFR Part 99 Subpart A3], <a href="#">click here</a> ; for a full list of FERPA exceptions [34 CFR Part 99 Subpart D31], <a href="#">click here</a> ; for information about disclosure of Directory Information [34 CFR Part 99 Subpart D37], <a href="#">click here</a> .
<b>Information about your anticipated future data needs, if any</b>	Data Requesters can indicate whether they plan to request the same data for future years, once they become available, and, if so, for how many years and for what purpose(s).
<b>A completed Data Selector Template outlining the specific data elements you are requesting and the research questions with which those elements are associated</b>	Use the Data Selector Template to identify the specific data elements (variables) you are requesting, the research question(s) aligned with each of those data elements, and any requested filters you would like applied to those elements (for example, filtering for data from certain years only). More information about the Data Selector Template—and details about special restrictions on the availability of some data—are provided below. See <b>The Data Selection Process</b> below for more information.

### *Writing Your Responses with Multiple Audiences in Mind*

Data Contributor representatives who review Stage A of your request are familiar with the NCLDS process and regularly review data requests on behalf of their organizations. For some of the representatives who review Stage B of your request, neither NCLDS nor reviews of data requests are regular parts of their day. As a result, your request will benefit from inclusion of details that will increase the confidence these audiences have in your reliability as a user of very sensitive data. Use of language that does not assume deep familiarity with data analysis also is helpful. The following suggestions for each Reviewer audience may help strengthen your request. Each example statement builds on the previous one to demonstrate how to capture language for multiple audiences.

- **Request Approvers** are the first reviewers of your data request. The Request Approvers look for evidence that your project requires data from more than one Contributor, and that the proposed project aligns with the NCLDS Learning Goals.

*Example: “ACME Research is requesting **K12 data, post-secondary data, and wage data for a project that will investigate postsecondary and workforce outcomes for high school students.**”*

- **Data Approvers** look for evidence that each requested data element clearly relates to the research questions you intend to answer.

*Example: “For a project that will investigate postsecondary and workforce outcomes for high school students, ACME Research is requesting **record-level data from 2013 to 2020, including input data such as K12 and postsecondary enrollment data and North American Industry Classification System (NAICS) codes. ACME also is requesting outcome data such as high school GPA, postsecondary GPA, and wage.**”*

- **Privacy Approvers** look for evidence that you know how to properly manage sensitive data, and that you understand the importance of protecting privacy (for example, by application of data suppression rules when results apply to a small number of individuals [sometimes referred to as “small cell sizes”]).

*Example: “For a project that will investigate postsecondary and workforce outcomes for high school students, ACME Research is requesting record-level data from 2013 to 2020, including input data (e.g., K12 and postsecondary enrollment data and NAICS code) and outcome data (e.g., high school GPA, postsecondary GPA, and wage. **The project can be completed with de-identified data, and all products and reports will present results in the aggregate, with attention given to data suppression rules set forth by NCLDS and NCLDS Contributors.**”*

- **Security Approvers** look for evidence that you can receive, analyze, and store the requested data securely, and that you understand your responsibility to properly and completely destroy all data once your project ends.

*Example: “For a project that will investigate postsecondary and workforce outcomes for high school students, ACME Research is requesting record-level data from 2013 to 2020, including input data (e.g., K12 and postsecondary enrollment data and NAICS code) and outcome data (e.g., high school GPA, postsecondary GPA, and wage. **The project can be completed with de-identified data, and all products and reports will present results in the aggregate, with attention given to data suppression rules set forth by NCLDS and NCLDS Contributors. Upon completion of our project, ACME IT professionals will work with NCLDS to ensure that all data are permanently and irreversibly destroyed.**”*

### 3. Identifying the Data You Want to Request

In keeping with NCLDS's commitment to privacy and security by minimizing data movement and data exposure, one of the criteria used to assess requests for data is whether those requests can be fulfilled via already-available datasets. To that end, before you start the request process, we recommend that you review existing aggregated datasets to determine whether there are publicly-available datasets that already meet your need. For example, one of our partners—the [Common Follow-Up System](#)—provides tables for selected high school-to-workforce data questions, and another partner—the [Early Childhood Integrated Data System](#)—provides tables for selected cross-program early childhood questions. In addition, NCLDS has posted [links](#) to these and other datasets and data providers on our website.

For similar reasons, consider whether what you seek to accomplish can be done with aggregated data and, if not, how you will justify your need for individual-level data. Think carefully about whether what you plan to request is necessary for meeting your need or whether it is instead supplemental but not necessary. You will need to make clear to Contributors that what you request is only what you need in order to answer your questions *and* only available to you via the NCLDS process.

We also recommend that you familiarize yourself with the [NCLDS Data Dictionary](#). In addition to its current function of helping you prepare for making your formal data selections, future versions of the Dictionary also will include **data access** and **data use** restrictions for specific data elements. Planned additions are information about limitations on who is eligible to request certain data (such as record-level wage data; see the next section for more information), as well as on how certain data can be used or displayed.

#### **Wage Data**

As noted in Table 2.2, the Stage B form includes a question about the Data Requester's eligibility to receive and work with record-level wage data. Federal regulations ([subpart B, 20 CFR, Part 603](#)) allow disclosure of individual-level wage data only to Public Officials (as defined in the regulations); all other Requesters can receive only de-identified and aggregated wage data. If your project requires individual-level wage data and you do not meet the definition of a Public Official, or if you are not sure whether you will qualify, contact [nclsdshelp@nc.gov](mailto:nclsdshelp@nc.gov) to set up a time to learn more about eligibility and to discuss analysis alternatives with the NCLDS Team.

#### **The Data Selector Template**

To indicate the specific data they are seeking, Data Requesters complete and submit a Data Selector Template, currently a Microsoft Excel spreadsheet, during Stage B of the data request process. NCLDS sends the template to a Data Requester upon reaching Stage B. Data Requesters use this template to identify their requested data at the element (variable) level

(see the **Understanding Element-Level Data** box). Each data element associated with your request is subject to review and approval by the relevant Data Contributor(s). The inclusion of a particular data element in the list of available elements does not guarantee that your access to it will be approved automatically. Detailed instructions for completing the Data Selector Template are provided in the spreadsheet. Requesters will need to navigate across several tabs, so, like the request form, it may be helpful for a Requester to spend time reviewing the entire spreadsheet before starting to fill it out. In the spreadsheet, you will be asked to provide information about your project (including your project questions), indicate the specific data elements you are requesting, associate each data element with one or more of your project questions, and identify any filters you are requesting. Current filters (which allow you to narrow the amount of data you are requesting) include the ability to indicate the specific years and/or Public School Units (school districts) for which you are requesting data. Directions about how to submit your completed Data Selector Template are provided in the Stage B request form.

### Understanding Element-Level Data

Elements (sometimes called variables) are individual points of data about a specific topic or concept. For example, NCLDS higher education Contributors provide several data elements related to the degrees they award (such as majors, minors, degree types, degree levels, and year of degree completion). If one of your proposed questions is about degrees awarded, you will need to indicate in your Data Selector Template not only each element related to degrees awarded that you would like to request, but also (as noted in Table 2.2) which of your questions that element will help you to answer.

### Multiple Instances of the Same Element

When selecting elements that appear on multiple tables from the same Contributor, you may be tempted to select the element only once. Please be aware that many of those repeated elements are not exact duplications of each other, with inconsistencies resulting from differences in when they were collected, by whom they were collected, or the guidelines followed when collecting them. As a result, we recommend that you select the same element each time it appears on **any table** from which you are requesting data. For example, if you select “gender” on one table, you should select “gender” on other tables from the same Contributor. Other elements to consider multi-selecting include (but are not limited to) race/ethnicity, year, age, and county.

The NCLDS team is working with its Data Contributors to develop common elements to make the selection of some of these elements across all tables from the same Contributor (and even across Contributors) more consistent. If you have follow-up questions, or if, upon receiving data, you identify potential data concerns, please contact the Request Manager at [ncldshelp@nc.gov](mailto:ncldshelp@nc.gov).

## 4. Navigating the Data Request Forms during the Limited Implementation Phase

Once fully operational, NCLDS will host a formal online interface for processing all data requests and for submitting related documentation. Currently, Data Requesters must complete and submit Stages A and B of the request process via Microsoft Forms and must submit related materials (e.g., formal documentation of faculty and/or Data Contributor sponsorships, IRB status, etc.) when prompted by e-mails sent by the NCLDS Team.

A few things to note about this temporary process:

- Because NCLDS's online User Interface is not yet available, the Stage A request form will *not* be accessible via the [Data Request Form page](#) of the public NCLDS website. Per the instructions on that page, send an email to the Request Manager ([nclsdshelp@nc.gov](mailto:nclsdshelp@nc.gov)) to let NCLDS know that you would like to initiate a request for data. NCLDS will provide a link to the Stage A form via e-mail.
- Your progress in Microsoft Forms should save as you go, but we encourage you to organize your responses in a separate document and only transfer this information into Microsoft Forms when you are ready to submit each stage of your data request. We recommend using the tables in the **Stages of the Data Request Process** section of this brief as a starting point for identifying and gathering relevant information before submitting your request via Microsoft Forms.
- As you enter your responses in Microsoft Forms, you may notice that question numbers are non-continuous—for example, Question 2 may be followed by Question 6. This is not an error—in order to ensure that questions in the form always align for Reviewers with question numbers on their review rubric, question numbers are fixed; your responses may allow you to skip certain questions, which is why you may see a gap between question numbers.
- Because NCLDS staff are handling most of the steps of request review and data package preparation manually during the Limited Implementation phase, NCLDS is not providing time-to-complete or time-to-response estimates and makes no promises about turnaround times for any stage of the process. Thank you for your patience as we learn with you about our process and about the length of time each step should take.

## 5. Beginning Stage C: Verifying Data Privacy and Security

After submitting the Stage B request and data selector forms, Data Requesters will receive an e-mail from NCLDS within five business days acknowledging our receipt of your form. Members of our team will review your request and may contact you with questions or to seek additional information. Once our administrators determine that your Stage B request is complete and that you are eligible to request the data you have identified, it then will be shared with each Data Contributor associated with your request.

**If all associated Data Contributors approve your Stage B request**, you will receive information and instructions by e-mail from an NCLDS administrator about additional steps preceding the data transmission process. **If at any step in the review process your request is not approved by NCLDS and/or our Data Contributors**, you will receive feedback from our team about why your request was not approved. In some cases, you may be asked to revise and re-submit a returned Stage B request; however, you will need to return to Stage A (re-start your request) if one or more Contributors formally rejects at Stage B and you want a modified version of your request to be considered again.

### **Privacy Impact Assessment and Security Attestation**

After the approval of a data request but before those data are made available, Data Requesters will receive a Privacy Threshold Analysis (PTA) form from NCLDS. The PTA includes a Privacy Impact Assessment section and a Security Attestation section. Data Requesters must complete this form to disclose the extent to which their organization's/institution's a) standards and policies and b) location(s) in which a Requester plans to store and work with all requested data *meet or exceed* the standards outlined in the North Carolina Department of Information Technology's [Statewide Information Security Manual](#). Additional information about statewide information security policies and related topics can be found [here](#) (in particular, the [Security Audit & Assessment document, SCIO-SEC-304: Security Assessment and Authorization Policy](#)). The Data Use Agreement for your request also will outline these security requirements.

If a Data Requester is not able to demonstrate full compliance with the standards linked above, approval still may be granted pending a review by the North Carolina Department of Information Technology's Enterprise Security and Risk Management Office ([ESRMO](#)), the [Office of Privacy & Data Protection](#), and security and privacy personnel representing the Contributors from whom you have requested data.

If you and your organization do not have designated privacy and security oversight personnel, you will be considered the privacy and/or security point of contact. Please note that, until your

#### **Data Security Standards and the Security Attestation Form**

The Enterprise Security Risk Management Office at the North Carolina Department of Information Technology and security personnel at each Contributor providing data for your request will need to verify the security of the system on which you plan to receive, store, and work with the data. To facilitate this verification, you will be asked to identify a person within your organization or institution who is responsible for overseeing the security of your computing tools, provide that person's contact information, and also indicate the level of security that is in place for those tools. Security level designations include:

- [ISO27001/HITRUST/FedRAMP/SOC II Type 2 certification](#);
- [NC Vendor Readiness Assessment Report](#);
- [NIST 800-53](#) compliance;
- [NIST 800-171](#) compliance; or
- [HECVAT On-Prem](#) report.

affirmation of your organization's/institution's privacy policies and procedures **and** your attestation of the security of your receiving system have been reviewed and verified, NCLDS will not be able to fulfill your data request.

**NCLDS takes data privacy and security very seriously**, but we know that understanding the constantly-evolving rules and technical details related to security can be challenging for many Requesters. If you have questions about any of these policies, please contact the NCLDS Request Manager at [nclsdshelp@nc.gov](mailto:nclsdshelp@nc.gov).

## Data Use Agreement

In addition to our review of your system's security, NCLDS also generates a Data Use Agreement (DUA) that you, NCLDS, and all of the Contributors whose data are included in the request must sign before data can be released. You can preview the standard NCLDS DUA [here](#); keep in mind, however, that each DUA will be customized to reflect the specific nature of your request, so, while the template is a good guide, it is not the final version of the DUA you will be asked to sign.

**The DUA is a legal document, so you may need to ensure that a member of your organization's legal team reviews the document before you sign.** Also, depending on your organization's policies for signing legal documents, you may not be the official signatory for your organization. If you do not have a legal team, you may want to consider engaging a lawyer for this purpose.

While we encourage you and your legal counsel to review the entire DUA carefully, here are a few areas of the DUA to which you may want to pay close attention:

- **Section 4.1.6:** At the end of your project, you will be required to upload a copy of any products you plan to publish or post based on your work with the data provided to you via NCLDS. Especially if you are working on a project with a specific deadline, be mindful in your project planning that the Data Contributors will have up to thirty (30) calendar days to review any proposed publications or studies resulting from your NCLDS data request. While NCLDS does not reserve the right to prevent you from releasing your publication or study, you will be required to comply with requests for modification if the preview uncovers components of the publication that potentially compromise privacy and confidentiality. For example, as part of this review, the Data Contributors will verify that all aggregated data reported do not violate the NCLDS data suppression guidelines (also outlined in the DUA; see below). In addition, to fully honor this requirement, you should share with NCLDS any analysis outcomes for which you do not currently have a publication plan but that you want to have the option to publish at a later date.
- **Section 4.1.7:** The DUA specifies the data suppression rules you will need to follow when publishing results. These rules include specific guidelines for data about minors and students (if applicable to your request).

- **Section 4.1.10:** Upon the completion of your project, you will need to provide NCLDS with a formal description of the methods you used to analyze NCLDS data. The details you will need to provide include a description of the study sample, your data cleaning process, your rules for including and excluding data (see NCLDS Redaction Standards as outlined in the [NCLDS Data Privacy and Security Standards and Policies](#)), your data analysis techniques, and a summary of your results.
- **Section 6.1.2:** In addition to the DUA itself, a Requester also is subject to the security requirements outlined in the previous section, which are reflected in a Privacy Threshold Analysis and Security Attestation (PTA) document. NCLDS completes the PTA on behalf of the Requester (using information provided by the Requester as part of the Stage B process) but the Requester receives a copy of the final PTA as part of the final data package.
- **Section 6.4:** Upon the completion of your project, you will need to adhere to all data deletion and media sanitization requirements, including formal verification that you have complied with data deletion requirements (if applicable).

### **Project Personnel Agreement**

Any members of your organization/institution's team who will have access to the data you are requesting are considered project personnel and must sign a Project Personnel Agreement (PPA) before data can be released. NCLDS will use information you provide in Stage B to send PPAs to your team members. The PPA asks signers to certify that they have reviewed the DUA associated with the project and agree to follow all terms outlined in the DUA, including those governing the use, privacy, and destruction of data. Each member of the project team will sign a separate PPA, and each PPA will also be signed by the Data Requester. If your project team changes at any point during the life of the project, new project team members also must sign Project Personnel Agreements.

#### **NCLDS is Here to Help**

If you need assistance at any point throughout your request process, please contact the Request Manager at [nclshelp@nc.gov](mailto:nclshelp@nc.gov).