

May 15, 2018

Dear Colleagues:

I write regarding data that impacts every Wisconsin district: student economic status. The need for quality economic status data remains critical, yet challenges to collecting these data have increased in recent years. This letter addresses the need for districts to establish data sharing protocols around economic status data.

The determination of economic status – whether a student is economically disadvantaged (ECD) or not – previously relied solely on food service eligibility (free or reduced-priced lunch status). **In the WISEdata system, two separate data elements are collected for economic status: [Food Services Eligibility](#) and [Economic Disadvantaged Status](#).** The use of [Food Services Eligibility](#) data to determine ECD status is subject to federal law managed by the U.S. Department of Agriculture (USDA). However, the Department of Public Instruction (DPI) also has to fulfill public reporting requirements that stem from the Elementary and Secondary Education Act (ESEA), overseen by the U.S. Department of Education. Using the same data source--food services eligibility--for meal programs and for public ESEA reporting has resulted in challenges in data collection and reporting at both local and state levels.

USDA guidance has led to some questions regarding whether food service vendors are permitted to share data with others in the district and with the state. **Student data, by law, must be shared from food service data systems with others in the district so student information systems (SIS) contain the most accurate count of economically disadvantaged students for required federal reporting.**

Districts can ensure that local economic and [Food Services Eligibility](#) data are protected by confirming that two protocols are in place:

1. *Vendor Security*: Because your local SIS vendor ensures the data in your SIS are secure, districts should verify that the SIS contract that you have in place specifically covers security around student food service eligibility and economic data, including those data that may come from a separate food and nutrition database/vendor.

The transfer of ECD data to DPI via WISEdata is secure based on the credentialing and data exchange process established between local SIS vendors and WISEdata.

2. *District Data Access Agreements*: Districts should manage the access and viewing rights of local ECD data. DPI encourages the use of local data access protocols. Ensure that the appropriate viewing rights and confidentiality agreements are in place, including for ECD and meal eligibility data. When authorizing personnel to access these data, follow

FERPA regulations. For an example data sharing and access agreement, see the prototype in Appendix C in the [Eligibility Manual for School Meals Determining and Verifying Eligibility](#), which is available on our [district resource page](#) on protecting student data privacy.

Both SIS vendor security and district protocols need to be in place to properly restrict access to food service eligibility data. DPI has a number of [Data Privacy](#) resources available, including a page dedicated to [district resources](#) that speak to the protection of student data.

Please be sure to share this information with staff who provide oversight of your local SIS, food and nutrition program, and who manage student-level demographic data. If your staff have questions, please direct them to Jeff Post, [jeffery.post@dpi.wi.gov](mailto:jeffery.post@dpi.wi.gov).

Sincerely,



Mike Thompson, PhD  
Deputy State Superintendent

MT/mjc

c: Dawn Crim, Assistant State Superintendent  
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