THE OPTIMAL REFERENCE GUIDE

MyData Button: Button, Button, Who's Got the Button?

Nobody! Click one button and get all your education data!
Too good to be true? Yes.

Extraordinary insight™ into today's education information topics

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The Background

Where's MyData Button for students? Back in 2012, the White House, the Secretary of Education, and several major companies promised to give students a single button to click to download _**ALL**_ of their education data. Their data would be in a common digital format to use themselves in so many ways. The students would be enlightened, informed, and empowered. Wow! Now in 2016, no buttons can be found.

I asked the U.S. Department of Education (USED) where MyData Button is—no button. I asked each of those companies—no buttons. Apparently no one else is asking why.

Education's MyData Button was part of a bigger initiative by the Obama administration to promote open access by government. Remember when transparency was a big deal and the Obama administration was going to be the most transparent one ever? Giving data back to the consumer (termed "smart disclosure") was a core component of its Open Government Directive. I've now sent two questions to the White House through their website—one to staff, one to the President. No response.

"Open access" of government data as a concept by the Obama administration is naïve for the education industry. "Smart disclosure" assumes that the students can have personal access to their data on demand—at the push of a button. The local school district isn't a branch of Wells Fargo Bank. In the education IT community, students don't have a few, directly connected accounts for which statements with a daily activity record for each can be printed as .PDFs.

Students have demographic, enrollment, attendance, family, meals, transportation, extra-curricular, behavior diagnostic, formative assessment, art, physical fitness, remedial program, gifted program, counseling, graduation plan, grades, transcript, daily lessons, discipline, and multiple EdTech app records distributed across multitudinous databases.

Did the White House think a student might go to each of these websites separately to gather data, then be able to concatenate them into a manageable record because standard definitions and formatting had been used by each of them?

With whom did they consult before issuing their press release? Did the companies who signed up not talk to their education agency clients first?

MyData Button is the quintessential representation of hopeful Occam's Razor optimism. Translated, that means the White House must have hoped that the simplest solution—a button to click—would meet the requirements of a problem that anyone with rudimentary experience and understanding of the education information ecosystem would have easily seen as confounding.

Veteran's Affairs and the Department of Energy have functioning data buttons. Why is MyData Button impossible for education data? Is it our complex data, aloof customers, resistant data managers (USED, SEAs, LEAs, vendors)—or the opposition of self-appointed privacy watchdogs? After months of wondering and researching, I think I know why. Yet again, the education enterprise has proven to behave differently from other industries.

- Data governance is less precisely defined and policies less publicized even though FERPA has been around since 1974.

- Data standards are, well, not very standard for exchanging data among applications and agencies. Oh, yes, there are several exchange standards to choose from and multiple definition standards to adopt. The U.S. Department of Education even developed a guide for MyData Button for the different standards. All a student would need to do is learn all of them, and crosswalk their data across them, and then begin to interpret any user-defined fields and rules allowed by the standards. (Any student capable of doing this should go to www.espsg.com and contact me for a job application.)

- The White House never mentioned anywhere the need for a common metadata dictionary or a crosswalk among the data sources. The USED and its National Center for Education Statistics have historically developed metadata dictionaries (e.g., Student and Staff Data Handbooks, and Common Education Data Standards), then stopped short of any official designation of them to ensure universal adoption by vendors and education agencies.

- This one is a question. Did the demise of inBloom scare away the developers and supporters of MyData Buttons?

- Oh, yes, then there are those multitudinous data sources spread out across the education agency.

MyData Button is a classic example of encountering the intertwined obstacles erected by this data milieu.

Because there are solutions to each of these issues, it's worth the effort to document the MyData Button saga.

MyData Button is an idea that seems to work for the VA and the Department of Energy when an individual has an account—a secure account. That's when an account, or a record, holds an individual's data. Those data may be extensive. There may even be more than one account for an individual. However, if we think about our multiple financial accounts in our bank, they are all very similar in terms of their data elements and formats. They share your exact personal data such that they can be considered either already federated or even a single account with various transactions—checking, savings, loans, IRAs, etc. That's an account like the VA or the Department of Energy could create.

The bottom line is that the USED's MyData Button should be working today on the FSA website—no excuses—just like similar buttons are working for the VA and the Department of Energy. Students using FSA's website have an account—a clearly defined set of data about a single individual, in a single location. FSA was announced in 2012 as the site of MyData Button's first appearance. Renamed to Mystudentdata Download, it never appeared. Links to it and directions how to use it are still live on the Internet.

On the other hand, MyData Button was a bad idea from the beginning as a universal notion for all education entities and EdTech companies. As un-American as it may sound at first, students shouldn't expect to get their personal data directly from all companies and applications off the Web with whom they are interacting. One of the biggest problems for a data button in the education industry is that the vendors, when they are holders of student data, don't own the student data. They don't make the decision to release the data when a student clicks the button. The education agency in which they are enrolled controls ownership and usage of their data and has to decide how to respond to requests for access—see FERPA.

There's another factor to consider. An education agency's data are not simply stored in a single location readily accessible for download with the click of a button. Creating a federated system for accessing all of a

student's data on demand is impractical. As an agency's disparate data sources evolve, are updated, are added, and change their technology, maintaining a federated system that can pull together a student's data in near real time or even within a reasonable time simply is not going to work. For an agency to provide access for a student or parent directly to all of the EdTech applications that contain a student's data is a security and confidentiality nightmare for the EdTech vendor, the agency, and the student/parent.

Agencies have built data warehouses that periodically capture student data from authoritative data sources. A typical data warehouse may hold a lot of data, but not nearly the majority of an agency's data. In addition, these data may have a degree of de-identification imposed depending upon their intended audiences and the agency's data governance policy. A truly de-identified database would be useless for MyData Button. A well-secured database behind an institutional firewall would be impractical for MyData Button. Open access and smart disclosure are not compatible with the concepts of de-identification and firewalls that protect the privacy of student data under FERPA.

Each agency must design the creative solution for access to personally identifiable data by students that works within a data governance plan adopted for their overall system. A simple button seems, well, simplistic given the complexities of the data, the data systems, and the data policies.

ESP's MyData Button Solution

ESP's goal for our clients is to provide students and parents of minor students transparency to the education data collected and stored about the student. Alternatively where appropriate, desirable, or practical, an education agency should provide access to the data themselves.
ESP solves this in two ways.

1. Data Governance Policy

    - ESP provides expert services to guide an education agency in developing their Data Governance Policy that provides the process for accessing the students' data.
    - The Data Governance Policy describes how students and parents discover what data are collected, stored, and reported.

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2. DataSpecs®

- ESP provides this metadata dictionary describing the data collected, stored, and reported about a student. www.DataSpecsCentral.com
- Students and parents can see reports describing these data.

So, there's no ESP MyData Button. There's an actual governance solution built upon the realities of how education data are collected, stored, and managed to protect the privacy of the student while serving the public mandates that required the collection of the data. Within this solution is the foundational tool, DataSpecs®, that manages the metadata and data governance processes.

What Should Everyone Do Now?

First, FSA should launch their Mystudentdata Download button as advertised.

Next, USED should abandon MyData Button for all other USED activities. Instead, their focus should be on supporting data governance policy development. Each policy should have a foundation of a metadata dictionary for the education agency to manage and publish their data collections, databases, and outputs where information can be accessed.

Companies should work with their client education agencies to understand the data governance policies under which they operate and must comply. A student data download process may or may not work for their product dependent upon each context and contract.

The Data Quality Campaign has provided useful general guidance in their recent publication "Time to Act: Making Data Work for Students." http://dataqualitycampaign.org/resource/time-to-act/

Editorial

Not every idea is going to be great. MyData Button works for VA and Energy, ought to work for FSA, but the grand vision the White House had in 2012 was naïve. There's considerable complexity, design, and policy required for a solution to a problem like giving students access to all their education data. The timeline published for launching MyData Button was unrealistic from the start. Let's get the puns out of the way. Did the White House think this button would be a snap done on a shoe string?

History of MyData Button and the Quest to Find One

The Obama Administration promoted open access to data for the consumer (termed "smart disclosure") as a core component of its Open Government Directive. The principals (sic) behind smart disclosure were summarized in a **September 8, 2011** memorandum titled "Informing Consumers through Smart Disclosure."
https://www.whitehouse.gov/sites/default/files/omb/inforeg/for-agencies/informing-consumers-through-smart-disclosure.pdf

Smart disclosure was led by the U.S. Department of Veterans Affairs' (VA) Blue Button (http://www.va.gov/bluebutton/) and US Department of Energy's (DOE) Green Button (http://energy.gov/data/green-button) initiatives. The Blue Button allows veterans to view and download their personal health records in a plain text format. A number of companies offers derivative solutions that utilize these data. Data may be viewed on mobile devices and jobs may be applied for using military service data. The Green Button allows consumers to download their home energy usage data from their electricity utility provider.

January 19, 2012, the Executive Office of the President announced MyData Button would appear on USED's FSA website. Five companies were named in the announcement as committing to launch "MyData Button" features, ETS, StraighterLine, Houghton Mifflin Harcourt, Pearson, and Parchment.

Hack Education's blog by Audrey Waters on **April 11, 2012**, examined the challenges of MyData Button.
http://hackeducation.com/2012/04/11/download-all-your-education-data-with-the-click-of-one-button

Then on **May 22, 2012**, "MyData Open Data Specification" was published for education. USED called upon education entities (schools, universities, test preparation companies, etc.) and service providers to offer an easy-to-use data download button for their customers. The goal of this initiative was to create a simple-to-use mechanism for consumers to download their education data in a machine-readable format on a provider's website and to define an open-data format for a provider to offer this functionality with minimal implementation burden by leveraging data standards already in use. The specification even included detail file formats for the data downloads.

On **August 16, 2012**, Pamela Eliadis, Service Director, System Operations and Aid Delivery Management, Federal Student Aid, announced that MyData Button would be available on the NSLDS Student Access website. https://www.nslds.ed.gov/npas/index.htm Specific details were

provided along with detailed descriptions of MyData Button's purpose and contents. Those are still live on FSA's website.

That was a virtual flurry of activity, wasn't it.

On **May 30, 2014**, I emailed Kathleen Styles, the designated U.S. Department of Education contact for MyData Button. She replied the same day, "Let me ask around and see if I can direct you to contact." That was her only communication. On **March 22, 2016**, I sent another email to Kathleen Stiles asking what the status was. To date, no response has been received.

During the week of **April 11, 2016**, I sent queries to ETS, Pearson, and Houghton Mifflin Harcourt through their websites or the emails provided on them. As of the writing of this paper, each replied with an automated message that they would get back to me within 24 to 48 hours. None has responded to provide an update on the absence of their MyData Button. Parchment's email, sent at the same time elicited a personal response from a cell phone saying, "I'm not familiar with the feature you are describing. Could you provide more detail?" I did.

On **April 14, 2016**, I entered a question on the White House website asking the status of MyData Button. No response has been received.

At some point, MyData Button was renamed by FSA to Mystudentdata Download. https://studentaid.ed.gov/sa/resources/mystudentdata-download Detailed definitions and instructions of how to access it and what it does are on the FSA website. However, Mystudentdata Download does not exist—and never did. After an exhaustive search of the FSA website to find MyStudentData Download following every link provided, I finally called the 1-800-433-3243 help line on **April 19, 2016**. The recording of the call is available at https://youtu.be/nthaTVuHGhk The person I spoke with confirmed that MyStudentData Download was never on the FSA website.

On **April 21, 2016**, I entered a question on the President's website. To date, no response has been received. (Yes, I check my junk email.)

On **April 27, 2016**, Parchment, a transcript exchange vendor, emailed that they had implemented a MyData Button for about 18 months. Based upon "nearly no usage," they removed the button and have no plans to re-implement it.

As of **April 28, 2016**, there was no evidence on the Internet that any education entity had MyData Button in service. The only one I ever found was The Department of Defense Education Activity's (DODEA) MyData Button on their MyData Parent Portal through 2014. http://www.dodea.edu/mydata/

About ESP Solutions Group

ESP Solutions Group provides its clients with *Extraordinary Insight™* into P20W education data systems and psychometrics. Our team is comprised of industry experts who pioneered the concept of "data-driven decision making" and now help optimize the management of our clients' state and local education agencies' information systems.

ESP personnel have advised school districts, all state education agencies, and the U.S. Department of Education on the practice of P20W data management. We are regarded as leading experts in understanding the data and technology implications of ESSA, SIF, ED*Facts*, CEDS, state reporting, metadata standards, data governance, data visualizations, and emerging issues**.**

Dozens of education agencies have hired ESP to design and build their longitudinal data systems, state and federal reporting systems, metadata dictionaries, evaluation/assessment programs, and data management/analysis and visualization systems.

To learn how ESP can give your agency *Extraordinary Insight* into your P20W education data, contact us at (512) 879-5300 or info@espsg.com.

Follow and respond to tweets investigating MyData Button at https://twitter.com/espsg or http://www.p20wforum.info/.

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