![mn DEPARTMENT OF HUMAN SERVICES]

Legislative Report

Family Supports and Improvement Program

Children and Family Services Administration

January 15, 2023

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Minnesota Statutes, Chapter 3.197, requires the disclosure of the cost to prepare this report. The estimated cost of preparing this report is $221,880

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Contents

I. Executive summary

This report is being submitted to the Minnesota Legislature pursuant to Laws of Minnesota 2021, First Special Session, Chapter 7. Article 14, Section 19 directing the Minnesota Department of Human Services to develop recommendations for implementing an information sharing program to improve the effectiveness of public assistance programs.

The Department of Human Services reached out to partners named in the legislation to create recommendations that crossed program areas and state agencies. Through a contract with Wilder Research, input was gathered via planning groups, a web-based survey with benefit administrators, and discussion sessions with representatives from counties, tribes and nonprofits that administer public benefits.

The survey and engagement session results identified areas where local agencies most needed support to implement a statewide data sharing program. This included changes to data sharing agreements, access to legal expertise, staff training and staff time at the local level. Additionally, legal barriers, limits to IT systems and families not wanting or not consenting to data sharing were identified during the exploration of this topic.

A statewide data sharing program should address concerns that tie to existing legal authority and limits to IT systems. Additionally, this potential program should consider how to work with family concerns around data privacy and data sharing.

II. Legislation

DIRECTION TO COMMISSIONER OF HUMAN SERVICES; FAMILY SUPPORTS AND IMPROVEMENT PROGRAM RECOMMENDATIONS.

The commissioner of human services shall collaborate with the Children's Cabinet to engage with the Minnesota Department of Education, the Minnesota Department of Health and other relevant state agencies, county and Tribal agencies, child care providers, early childhood education providers, school administrators, parents of families who qualify for or are receiving state or county assistance, and other service providers working with those families to develop recommendations for implementing a family-focused voluntary information sharing program intended to improve the effectiveness of public assistance programs and the delivery of services to families, including but not limited to the child care assistance program, Minnesota family investment program, supplemental nutritional assistance program, early learning scholarships, medical assistance, and home visiting programs. To the extent possible, the commissioner may use existing data, materials, or reports. The commissioner may engage a third-party vendor to assist with developing recommendations. The family-focused information sharing program design may include data sharing under Minnesota Statutes, section 13.32, subdivision 12. The recommendations must include whether grant money is necessary for counties, Tribes, or other agencies for costs associated with operating the family-focused information sharing program. The recommendations must include an estimated budget and timeline for the project, a proposed methodology to distribute grant money to counties, Tribes, or other grantees if needed to operate the project, and deadlines for an interim and final report on the results of the program. The commissioner shall provide the chairs and ranking minority members of the legislative committees with jurisdiction over early childhood and human services programs with recommendations and, if necessary, proposed legislation by January 15, 2023.

III. Introduction and Background

A. Purpose of report

This report is submitted to the Minnesota Legislature pursuant to [Laws of Minnesota 2021, First Special Session, Chapter 7, Article 14, Section 19](#). This statute established a report by the Department of Human Services (DHS) that engages collaboratively with state agencies, county and tribal agencies, and other stakeholders to develop recommendations for implementing an information sharing program to improve effectiveness of public assistance programs.

This report was prepared by the Department of Human Services (DHS) Child Care Assistance Program (CCAP) and Wilder Research.

B. Problem

This report originated in response to challenges Minnesota families face in applying for public assistance. Previous community engagement processes, such as during the Planning Grant phase of the Preschool Development Grant, have found that Minnesota families are juggling the required paperwork for multiple programs and may not even know which programs they need or want to access based on their personal situation. This leads to frustration for families and local staff and distrust in the overall system. It also results in government inefficiency and eligible families who want help being underserved. Depending on their place of residence, and particular circumstances and needs, a family may need to complete and submit separate applications to different agencies, and provide multiple sets of verifications, such as birth certificates, paystubs and taxes.

The aim of this report is to identify next steps to address challenges Minnesota families face when interacting with various public assistance programs, based on concrete qualitative and quantitative data. This report was inspired in part by efforts from Dakota and Olmsted Counties that demonstrated to legislators possible solutions to more effectively serve children and families who access public assistance programs.

Improving data sharing among public assistance programs will create better outcomes and experiences for Minnesota children and families that navigate assistance programs. It will also improve the efficiency and effectiveness of assistance programs, enhance program integrity and provide higher quality data for research and evaluation. Data coordination and integration will help invested parties hold state agencies and local government accountable for increasing equity and use of public funds.

These recommendations outline how the state can facilitate improved data sharing and data integration. Actionable Intelligence for Social Policy at the University of Pennsylvania defines data sharing and data integration as (Hawn Nelson et al, 2020, pg. 1):

- DATA SHARING is the practice of providing partners with access to information (in this case, administrative data) that they cannot access in their own data systems. Data sharing allows stakeholders to learn from each other and collaborate on shared priorities.

- DATA INTEGRATION is a more complex type of data sharing that involves record linkage, which refers to the joining or merging of data based on common data fields. These data fields can include personal identifiers, such as name, birth date, social security number or a common encrypted "unique ID" that is used to link or join records at the individual level.

C. Survey methods and stakeholder engagement process

CCAP contracted with Wilder Research to support this work. Wilder implemented the following methods to gather information about national and Minnesota data sharing practices, as well as perspectives of benefits administrators. The department partnered with representatives from the Minnesota Children's Cabinet and the Departments of Health (MDH) and Education (MDE) on this report. Multi-sector partners were identified and engaged throughout the process, including Dakota and Olmsted Counties, who were referenced in meetings as the legislation was being drafted. The document was informed by initial engagement, literature review and a survey that was sent out to counties, Tribal Nations and other administrators that interact with public assistance programs in Minnesota.

Document and literature review

Wilder Research conducted a review of relevant literature regarding data sharing. This included literature on improving the effectiveness of public assistance programs, integrated data, closed loop referral systems and technology and data sharing practices. Findings from this literature review are woven into appropriate sections of the findings section. In addition, Wilder reviewed reports and documents related to data sharing efforts previously conducted and currently underway in Minnesota. A list of all the articles and reports reviewed is in Appendix F.

A web survey of benefit administrators

Wilder Research implemented a web-based survey for staff who have a role in implementing public benefit programs. The survey was designed in collaboration with state staff, including CCAP, Economic Assistance and Employment Services Division (EAESD), Business Solutions Office (BSO) and Early Learning Scholarships staff from MDE. See the Appendix A for a copy of the survey. The survey was designed to garner information about how benefit administrators currently share data, barriers to data sharing and supports needed to improve family data sharing. Wilder generated a link that was then shared with state staff, who forwarded the link to numerous groups who administer state benefits. This included counties, Community Action Partnerships agencies, Tribal Nations, Early Learning Scholarship administrators, local public health and school districts.

In total, 177 people completed the survey (see Appendix E for a table describing respondent characteristics). At least one person serving nearly every county responded, with the exception of Koochiching and Lake Counties. Results were analyzed by the county in which respondents work. Counties with over 100,000 residents were

considered large for the purposes of the analysis. Representatives from four Tribal Nations also responded, including Leech Lake Band of Ojibwe, Mille Lacs Band of Ojibwe, Red Lake and White Earth Nations.

Over half of the respondents administer CCAP, Supplemental Nutrition Assistance Program (SNAP) or Minnesota Family Investment Program (MFIP) benefits. There was representation from all programs specifically mentioned in the legislation, including CCAP (51% of respondents), MFIP (51%), SNAP (53%), Early Learning Scholarships (17%), Medical Assistance (44%) and home visiting programs (22%).

Half of respondents work directly with counties and 20% of respondents were from school districts. The rest of the respondents primarily came from Community Action Programs or nonprofits. Two-thirds of respondents were either managers or supervisors (39% and 27% respectively). This pattern emerges across small counties, large counties and Tribal Nations.

Listening sessions with stakeholders

Wilder Research also facilitated listening sessions with the following groups to gather qualitative data and feedback on similar topics. See Appendix A for a copy of the listening session questions.
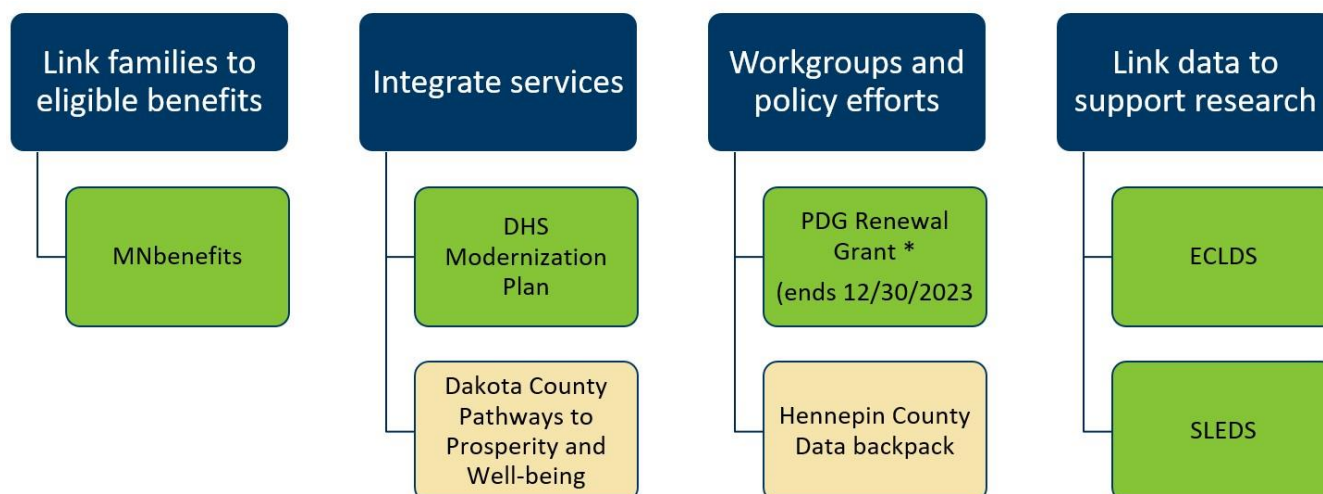
- Community Action Partnership agencies (14 participants)
- The Minnesota Head Start Association (this was a large group; about 8-10 actively participated)
- Counties (9 participants across two sessions)
- Early Learning Scholarship administrators (this was a large group; about 5-7 actively participated)
- Tribal agencies (2 participants attended the specific engagement session, and DHS has shared updates on this project at quarterly Minnesota Tribal Resources for Early Childhood Care meetings)

IV. Findings

A. Efforts currently underway

Minnesota has worked to integrate family data to improve benefits for many years. There are a number of statewide efforts, including MNbenefits, the DHS Integrated Services Delivery project and a data workgroup that explored issues of data sharing as part of the Preschool Development Grant (PDG) and other data sharing efforts.

The chart below lists how efforts accomplish different tasks related to developing a family-focused, voluntary information sharing program. The Early Childhood Longitudinal Data System (ECLDS) and the Statewide Longitudinal Data System (SLEDS) collect information to link data to support research to improve systems for Minnesotans.

Link families to eligible benefits	Integrate services	Workgroups and policy efforts	Link data to support research
MNbenefits	DHS Modernization Plan	PDG Renewal Grant * (ends 12/30/2023	ECLDS
	Dakota County Pathways to Prosperity and Well-being	Hennepin County Data backpack	SLEDS

MNbenefits

MNbenefits is an online benefits application where Minnesotans can apply for several safety net benefits, including food and cash assistance, emergency assistance, housing support and CCAP. MNbenefits is a tool for service delivery transformation, focused on data collection that can be built to potentially be used for more integrated data sharing. MNbenefits is available in all 87 counties and 11 Tribal Nations. Survey respondents reported the top two ways they engage in data sharing as (1) using MNbenefits to either to encourage families to use it (62%), and (2) accept applications (44%). Using MNbenefits is more common among small counties and Tribal Nation representatives. The survey results showed that 69% of respondents from small counties reported that they encourage families to use it, and 52% said they accept applications. [Note: All counties accept applications from MNbenefits, it is possible that the respondents were unaware of this relatively new tool and or are not the staff directly overseeing its use.] Listening session participants also reported using MNbenefits, however, they noted that the limitation of that resource is that it is only for 9 programs, and often data are missing and the administering agency still needs to follow-up with the family.

A Hennepin County employee said that MNbenefits, "Is probably the single most impactful modernization action that the state has taken that impacts residents and line staff. I don't mean it from a Hennepin perspective, I mean it for the whole state. We're breaking down barriers, building on structures we already have, not a new system. We should invest in what's impactful."

DHS Integrated Service Delivery

In 2018, DHS adopted a model for integrated service delivery that aims to change the way people experience the human services system. The Integrated Service Delivery (ISD) Product Line is the method in which DHS is moving forward with the Integrated Services Business Model (ISBM) and the vision for person-centered, integrated human services.

The ISD Product line is one part the service delivery transformation effort within DHS. The goal of service delivery transformation is to better serve people by evolving the way our programs, services and technology come together and are funded so that people can more easily receive the support they want and need (person-centered human services). Service delivery transformation is a multi-year effort.

The initial focus for the ISD Product Line is building upon MNbenefits and integrated eligibility and enrollment for health care, food assistance and cash support programs. Currently the vision for ISD incorporates four product lines; MNbenefits, MNrenewals and two specific product lines focused on improved client communication and improved worker efficiencies.

Through use of the ISD Product Line, people have easy, equitable and uninterrupted access to benefits that holistically meet their self-determined social needs. State, county, and Tribal Nations staff have access to simplified and integrated tools and supports they need to best serve individuals and families.

The vision stated on the DHS Integrated Services website is:

> "*No matter where or how people begin to explore human services, they will be able to learn about and access the breadth of programs and services available. Creating an experience that is easy to navigate, uses the technology people are used to using in their daily lives, and meets them where they are. . . . [and] includes giving individuals and families the power to focus on personal goals, helping them prioritize and address immediate needs, and providing information about possible root causes for them to consider, as well as possible programs and services that might be a fit. DHS and its partners envision that programs and services will be coordinated across the community, county, Tribal Nation and state. People will be able to choose supports and services that fit their lives, wants, needs and goals.*"

Several projects are being advanced as part of the effort. Previous DHS initiatives with significant overlap to the Family Supports Improvement Program include:

- Social Needs Tool for personalized referrals to make programs and services easy to access. This project included a survey and interviews with community leaders, both conducted by Wilder Research, to gather information from potential users to inform the development of a tool with 6-10 yes/no questions to connect people to referral information and resources. While the focus of the survey and interviews was on how to find services and collect data for that purpose (rather than on sharing data), some key findings are relevant to both the collection and sharing of individual-level data. For example, findings showed that technology needs to be simple and easy to use, and users' privacy and confidentiality concerns need to be addressed (DHS, 2019; Serafin and Schabuen, 2019).
- The Modernization Plan is a collaborative effort between counties, Tribal Nations, DHS and MNIT to change the way we deliver human services through integrated service delivery, supported by technology.

These projects are no longer being developed but supported efforts for improving human services program delivery and data sharing.

Preschool Development Grant (PDG) – Planning Grant (2019) and Renewal Grant (2020-2023)

A data workgroup, consisting of members from the Children's Cabinet, MNIT, Departments of Education, Health, Human Services and Administration, was engaged as part of the Preschool Development Grant – Planning Grant from March 2019 through August 2019. That workgroup identified several recommendations in the Early Childhood Coordinating Eligibility and Services Summary. Recommendations included the need for legal and technical support, community engagement, champions within government and dedicated staff. As a result of

this work, the state was successful in applying for a Preschool Development Grant - Renewal Grant and has moved forward coordinated eligibility and services in several areas related to legal interpretation of data sharing and technical efforts (Appendix B).

Longitudinal Data Systems

The [Minnesota's Early Childhood Longitudinal Data System (ECLDS)](#) serves as a model for cross-agency data integration for research purposes. ECLDS links data collected by the Departments of Education, Human Services and Health into one, online interactive database. The system collects personally identifiable information of children, and protects their privacy by showing only group results in its public-facing reports which can be disaggregated by a variety of shared characteristics and experiences. ECLDS shows children's growth and achievement in relation to their participation in a variety of public education and social programs from birth into third grade, and is the early childhood companion site to [Statewide Longitudinal Education Data System](#) (SLEDS), which focuses on high school, higher education and workforce experiences of Minnesotans.

County and Local Level actions

In addition to the state-level efforts being taken to improve service delivery, integrate data and make public benefits more effective, counties and Tribes have also piloted efforts. In fact, the survey of benefits administrators found that two-thirds of respondents (67%) said their agencies are currently part of a cross agency data sharing initiative. Below are three ways counties are considering data sharing.

Dakota County Pathways to Prosperity and Well-Being

As noted in Kone Consulting's December 2021 report, "Pathways to Prosperity and Well-Being (P2PW or Pathways) is a pilot initiative of the Dakota County Community Services Division (CSD) that seeks to end generational poverty through the redesign of both service delivery and public assistance benefits." (Kone Consulting, 2021, pg. 3).

The goal of the legislation requiring this report was to seek recommendations to "improve the effectiveness of public assistance programs and the delivery of services to families," which overlaps with P2PW's purpose to improve the county's ability to efficiently package and deploy effective social services. Along with a multi-disciplinary staff team, the model includes case management tools to support case managers in sharing data to coordinate care across multiple public assistance programs, including MFIP, SNAP, CCAP and Diversionary Work Program (DWP) (Fischbach, M., Lerner, K., & Henspeter, E., 2020).

Integrated Services Assessment Tool (ISAT)

Developed by the Future Services Institute, the ISAT was developed in partnership with Olmsted and Dakota County staff to help case workers identify families' greatest needs, as well as their assets, in 14 domain areas. It can be administered over time to track changes over time. While not a data sharing program, the ISAT can play a role in improving the delivery of services of families by providing county staff a more holistic picture of a families' needs and assets and help track effectiveness of public benefit programs.
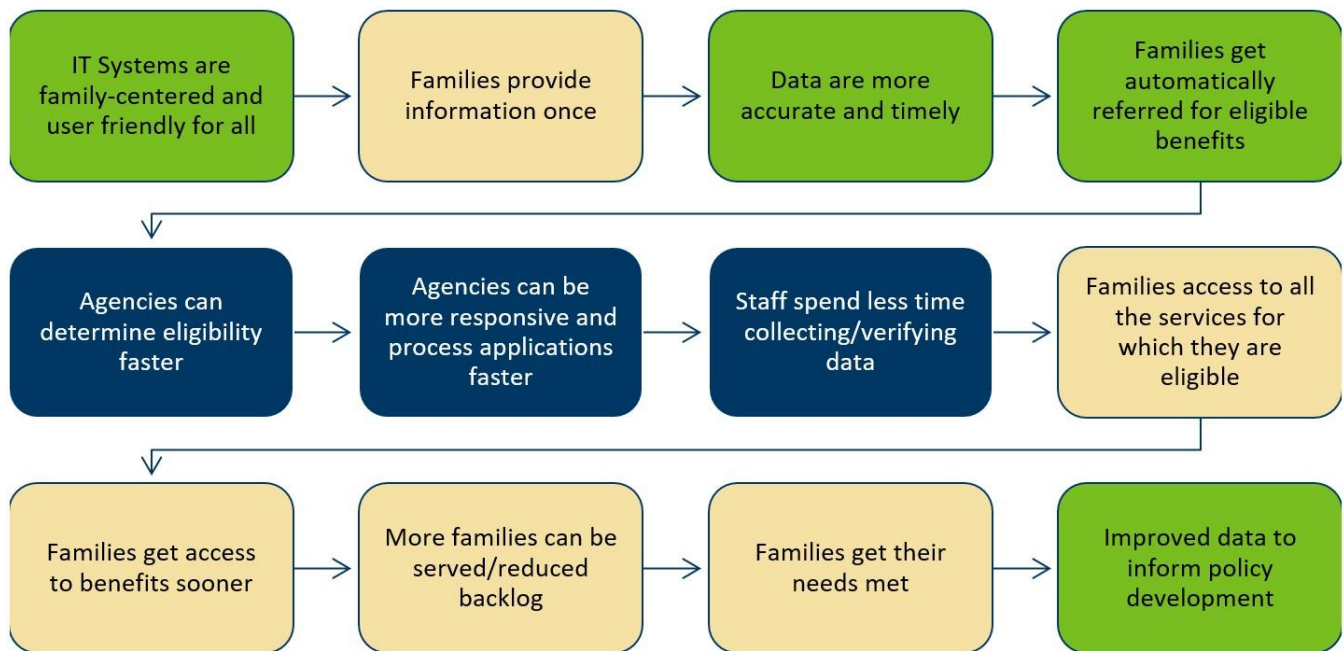
Hennepin County's Data Backpack

The focus of the legislation leading to this report is primarily on state-funded, county-administered public benefits. However, Hennepin County as indicated: "In the best interests of children, schools and counties must share data." (Hennepin County, 2019, pg. 1). This aligns with the findings of the PDG's Data Workgroup, noted above, that offered potential data sharing opportunities between school districts and counties.

To that end, Hennepin County leadership and staff identified strategies for improved data sharing that would be important to consider in a future statewide family data sharing program (Hennepin County, 2019, pg. 2-3):

- Legislation that better aligns with the federal guidance from Family Education Rights and Privacy Act (FERPA) and Ever Student Succeeds Act (ESSA) that outlines the need for ongoing and enhanced coordination between education agencies and child welfare agencies, including data sharing.
- An interagency agreement between the Department of Human Services and the Minnesota Department of Education for the primary purpose of sharing the child's school identification (MARSS) number.
- This action was completed through PDG efforts. A [Coordinating Eligibility and Services Legal Agreement](#) was executed, after thorough consultation with several community partners and local governments. The agreement allows for better eligibility and service coordination at the state level. More information can be viewed in the [Frequently Asked Questions: Coordinating Eligibility and Services](#).
- A data warehouse ("Data Backpack") to electronically collect and share education information between school districts and county agencies.
    - Option A: Statewide option (the Data Backpack) is a single, statewide education records system that makes education records easily accessible, secure and transferable across school districts.
    - Option B: Local option (Learner-Progress Portal) proposes county level solutions that include the development of a hosted Learner Progress Portal that could be contracted for or, if preferred, integrated with Hennepin County's existing Identity Access and Management Solution.

B. Stakeholder engagement results

Survey respondents were asked how sharing data across public benefit programs would make their jobs easier, better serve families and be more efficient for agencies. This diagram describes their response to how a data sharing system could benefit agencies and their staff (blue), families (orange), and the system (green). While the diagram shows a general outline of how the benefits will lead from one to the other, the benefits will likely not be this linear.

IT Systems are family-centered and user friendly for all	Families provide information once	Data are more accurate and timely	Families get automatically referred for eligible benefits

Agencies can determine eligibility faster	Agencies can be more responsive and process applications faster	Staff spend less time collecting/verifying data	Families access to all the services for which they are eligible

Families get access to benefits sooner	More families can be served/reduced backlog	Families get their needs met	Improved data to inform policy development

Current data sharing practices

Two-thirds of survey respondents (67%) said their agencies are currently part of a cross-agency data sharing initiative. In a follow-up question about how they share data, 107 respondents offered the following feedback:

- Data sharing practices:
  - Collection of release of information forms, particularly for sharing data with another agency
  - Regular meetings and communication between counties, school districts and local agencies
  - Electronic data sharing services, such CaseWorks EDMS
  - Receive or provide referrals
- Other practices:
  - Coordination and data sharing is easier across programs that are hosted within the same agency
  - Participation in MNbenefits common benefits application

Legal agreements

About a third of respondents (32%) said their agencies have legal agreements to share data among programs within their agency/organization, as well as legal agreements to share data with other local agencies or nonprofit organizations. This was less common among representatives from Tribal Nations. The majority of organizations who have legal agreements to share data within their organization also have agreements to share data with other agencies or organizations. This suggests that once the legal/technical infrastructure is created to share data within an organization or agency, it supports external data sharing as well.

Databases and IT systems

The Shared Master Index (SMI) is a web-based database for storing client demographic data and program participation across several programs DHS administers. The purpose of the SMI is to assist counties, tribes and

DHS to coordinate client services across state and county systems. SMI provides a common database for client demographic data and a comprehensive view of client participation. All 87 counties have users that are either internal staff or contracted vendors. While all counties have SMI users, only five counties (Blue Earth, Carver, Dakota, Hennepin and St. Louis counties) currently have systems that directly interface with SMI for real time data access (web services) from the SMI. Among survey respondents, about a quarter of respondents (28%) reported using SMI. **Appendix C** contains a list of IT systems and databases mentioned during listening sessions.

Mail, phone and meetings

Many survey respondents also shared the various manual ways they share data via telephone, mailing forms and face-to-face meetings with clients to gather data or with agencies to pass along data.

Agencies that administer public benefits are taking efforts to share data for the benefit of families; however, often coordination is time intensive and requires a lot of manual work to obtain multiple signed consent forms, meet and communicate with partner agencies, and share data.

Barriers and needs for data sharing

Legal barriers and client privacy concerns

Legal barriers were the top reason survey respondents indicated they are prevented from data sharing (noted by 51% of respondents). Agency representatives most frequently said they would need data sharing agreements or legal expertise (59%). In open-ended comments, several respondents noted they lacked sufficient releases or did not systematically track consent from individuals to share data across programs. A few noted that counties are limited to what data they can share because they lack access to data from state agencies. Other respondents shared the following about their perceptions of data from DHS and MDH:

> *DHS barriers; i.e. it is frequently very difficult to gain access to data that counties are statutorily allowed to share, often without consent.*

> *MDH has prevented us from having local agreements but are reluctant to have statewide agreements.*

Families not wanting or consenting to their data being shared was the second most frequently listed barrier (by 36% of survey respondents).This was more frequently noted among representatives serving small counties. Consent for data sharing was also noted in the listening sessions. Similarly, as part of DHS's work to develop a Social Needs Assessment Tool, Wilder Research conducted a survey and interviews of community members and survey respondents who identify as Black, Indigenous, or People of Color. This survey showed that respondents generally reported feeling less comfortable sharing personal information with DHS (Minnesota Department of Human Services, 2021, pg. 2).

Benefit administrators acknowledge their role to protect family privacy. How agencies and counties interpret privacy law can vary. Some partners believe there are more opportunities to share data than are being utilized due to agencies' interpretation of the pertaining laws.

> *"It is a value of us in Head Start to protect family information. We have informed consents. Not all government funded entities have the same value around data privacy. Even more education or trainings around privacy."*

"Data sharing laws are complex. They allow a lot, but the mechanics means it comes very individually. Each privacy officer has their own perspective. Each system is across different stakeholders and owners. Technical challenges and consent issues. Internal risk management varies."

"How do we create user-friendly data pools that are meant for case management, not just research and evaluation, where we can pull down that data based on roles? And the resources to simplify all this. Common consent forms, common legal definitions. So much waste in every county and county attorney figuring this out on their own. A centralized interpretation of what we can and cannot do."

More data sharing and integration may be possible than agencies currently allow. As a county-administered benefit system, ultimately county attorneys are interpreting laws around data privacy that county staff and their agencies partners must adhere to. A survey respondent noted that: "Insufficient knowledge around data sharing practices has providers erring on the side of caution even when it is more restrictive than necessary."

The Department of Administration Data Practices issued an [Advisory Opinion 20-005](#) in April 2020 that stated that private or confidential data may be shared with individuals in other programs or units within the same government entity when the individuals have a work assignment that reasonably requires access, and that private data may be shared or exchanged between government entities when authorized by statute or federal law. In the Advisory Opinion, the Department of Administration Commissioner specifically addressed sharing provisions that MDE referred to in its advisory opinion request.

The process of accessing individual client data is governed by federal regulations including The Privacy Act of 1974, the Health Insurance Portability and Accountability Act and the Family Educational Rights and Privacy Act. Additionally, accessing client data is also governed by the Federal Tax Information (IRS) and Social Security Administration regulations around data access and usage, as the release of personally identifiable information is a risk to privacy and confidentiality (Petrila 2011). The interpretation of appropriate data use, data integration and data sharing is often dependent upon the experience around these data sharing and access regulations, which can vary across localities. Organizations and agencies that are attempting to protect client privacy and improve data security will hear different things from different offices, leading to confusion and slow processing times (Fischer, et al 2019). Despite the data security being legal and technological in nature, multiple reports pointed out that relationship building was a critically important solution (Allard et al, 2012; Fischer, et al 2019).

As stated in the 2018 [Early Childhood programs report](#), the Office of Legislative Auditor notes that lack of data sharing prevents the state from tracking the reach and impact of the state's early childhood programs. The Office of the Legislative Auditor suggested that data sharing "could help agencies operate more efficiently and reduce the paperwork burden that families now face when providing income information to multiple agencies." They also recommend that the Legislature consider broadening authority for the Departments of Education, Health and Human Services to share individual-level data from early childhood programs (p. 85).

Similarly, Management Analysis and Development (MAD)'s February 2022 [legislative report](#) on state-level governance for early childhood programs in Minnesota, noted the importance of improving data sharing, data systems and, ultimately, service coordination. This was identified by state agency leaders overseeing early childhood programs, early childhood program administrators and advocates.

Through the state's Preschool Development Grant, further work to support legal analysis for local-level data sharing is underway through early 2023. The Attorney General's Office will:

- Identify state and federal statutes and administrative rules and practices that prevent or complicate data sharing among programs serving children and families.
- Summarize how state and federal statute and rules impact data sharing at both the state and local level.
- Draft template Tennessen warnings where needed.
- As necessary, create template or compile sample documents, such as memoranda of understanding, flow charts and checklists, to support state and local staff implementing programs.
- Document a standardized legal understanding of how state and local government entities can share data, both between state and local entities and among local governments for the purposes of serving children and families.
- Draft guidance to support understanding of these statutes and rules among staff implementing these programs, including how the statutes and rules enable data sharing between local program administrators and schools.

This work is a first step to meet many of the concerns of survey respondents and will require additional implementation action once complete.

Technology, alignment and accuracy

IT was the third most frequently listed barrier (by 31% of respondents) and was more commonly identified as a barrier in large counties and Tribal Nations. Technology support was also a top need reported by 40% of respondents when asked what they needed in order to implement a voluntary statewide data sharing program. Similarly, the Office of Legislative Auditor reported that "state agency representatives said their outdated information technology systems would affect their ability to coordinate services with other state agencies" (p.86).

Finally, 29% of respondents reported that the data they collected was not aligned with the type of data that other programs need or collect. This issue was echoed in the listening sessions, in which participants noted that lack of standardization and familiarity across documents and across agencies is a barrier to data sharing. Participants described the difficulties of having varying practices and documents across different programs, even with the same agency, which limits their access to the required data. Programs collect different types of data, based on the law, which is often is not aligned with the data needed for another program.

> *"[It is a] program to program issue. We don't always know who to share data with even if we have the forms. We don't necessarily know who the contact person is for the other program." - Community Action Program (CAP) responder*

Data accuracy was not noted a common barrier among survey respondents, with only 15% of respondents from counties and no respondents from Tribal Nations indicating this was a barrier. Respondents reported that data about employment and income, and others in the household, are most often unavailable (44% and 34%, respectively). Addresses are often inaccurate (23%); whereas data on individual demographics are most often available (9%). This is echoed in the literature. Participants in similar studies identified employment and income data as being at the top of their wish list (Allard, et al, 2012; George, Wiegand, and Gjertson, 2021).

The literature review did find that data quality is of key importance to increase data use. Data quality typically refers to the accuracy of the data, as well as having data with the right kinds of details (for example, socio-

demographic information, place-based data, etc.). Accurate data with the right details is not available (Fischer et al, 2019, Allard, 2012). Often data or a data system created for specific purpose is not usable or other contexts. For example, intake data collected for one program does not meet the needs of another program given their differing eligibility requirements. In these situations, issues arise when data are shared or combined. When combined, Brown et al 2020 describe how administrative data might have multiple entries for an individual with conflicting information since the data were collected by different agencies for different purposes.

Allard et al. (2012) note that it is of particular importance that data systems be designed to meet the needs of front line workers to ensure the collection of accurate, high quality data. This has implications for both hardware (computer terminals for analysis, servers for data sharing, and computers or tablets for intake) and software (programs and dashboards to analyze and review data) (Allard, et al, 2012; George, Wiegand, and Gjertson, 2021).

Organizational culture and staff training

Half (49%) of respondents indicated they would need staff training to implement a voluntary statewide data sharing program. Administrators serving small counties and Tribal Nations were more likely to say they would need staff training. Staff training and support needs to accompany the creation or integration of any data system, both to support staff who are collecting or using the data as well as clients who are entering information via client portals. Guilfoile and Hirschtritt conducted 20 interviews in Hennepin and Olmstead counties in 2020. These interviews were with clients participating in public benefits programs. These client vignettes suggest that submitting information is easier using online portals, rather than in person, as long as the client portal or platform is well made and maintained. An online portal, however, cannot replace a human being, so investment in additional data infrastructure or client portals needs to be accompanied by investment in additional client services (customer support, navigators, etc.) to support the use of this new technology.

In addition, changing behavior and culture are at the core of building or changing data systems and prioritizing service coordination for families. Technological improvements can increase the availability and use of data, but are not a replacement for building a culture that values the use and understanding of data (Allard, et al, 2012). To that end, allocating staff time to specifically work with data is critical (Allard et al, 2012). A data system may be in place, however if there is not time to learn how to use the system then it will not get used or used correctly. This is of particular importance when building or adopting a new data system, when staff need time to become familiar and comfortable with a new way of serving clients and monitoring systems.

The lack of collaborative, cross-agency relationships and data sharing processes was identified as a top barrier among Tribal agencies (33%), though less frequently noted among administrators serving counties (20%).

Very few respondents indicated that "there is no reason for my agency to share data." This suggests that if a data sharing system is implemented, benefits administrators will use it.

Support needed to make Family Supports data sharing program more feasible

Listening session participants were asked what type of support they would need to make a family supports data sharing program feasible.

First, they noted the need for a **cultural shift** around new approaches to data collection and sharing. They stressed that agencies need stronger partners and improved methods to share data. Specifically, there is a need

for a system that shifts data to a human-centered approached rather than just making traditionally paper forms digital. Some highlighted MNbenefits as a success. One county responder noted that in MNbenefits the "applicant answers a very human-centered set of data, rather than just a form that is now online." Others would like to see a shift at the state in which silos across programs can be broken down with the hope that that shift filters down to counties.

Second, some noted the need for **improved technology** that allows for easier data sharing. This could include updating, standardizing and integrating current documents, tools and technologies to improve alignment across different programs. Internet service in rural Minnesota can also be a challenge, so support for ensuring rural counties and partners have access to consistent and fast internet service.

> *"Integrating data across programs, we would need resources for software and someone to work on the software." – CAP Agencies responder*

Echoing feedback from the survey, there is a desire for **common legal definitions**.

> *"Common consent forms, common legal definitions. So much waste in every county and county attorney figuring this out on their own. A centralized interpretation of what we can and cannot do." – Counties responder*

Finally, some stakeholders noted that any data sharing program really needs to be **statewide**, and that end users need to be involved in the development. This could mean building out MNbenefits to include more programs, and to collect an additional level of detail for families to bridge data gaps. MNbenefits as it currently works is to act as a cover page program and expanding the program would require more information to be coded into the state systems. This development over time could expand MNbenefits to be used with more programs.

> *"It's going to have to be a system at a state-level to bring data in, aggregate and sort it all at a secure way. Getting access to MARSS [Minnesota Automated Report Student System; state issued student ID] numbers and vaccine records took years. We would want this to be very easy for us to access and use. I think the way to update data would be important because family circumstances to change or for families to opt out, to have their data pulled out of the system." – Head Start responder*

> *"It is extremely important that end users be part of the development. End users – the individuals who are working directly with programs. Direct service staff and their coordinators." – CAP Agencies responder*

> *"We get information from MNbenefits for CCAP (it is forwarded to the county worker) but it doesn't have all the information we need, so we are still reaching out the family." – CAP Agencies responder*

V. Report recommendations

The Department of Human Services recommends implementation of the following recommendations. Implementation of the recommendations will take place at the Department of Human Services in partnership with the Departments of Health and Education and Children's Cabinet. If funded, an interim report to the legislature beginning January 2025 and a final report January 2027 will be required. Implementation of these

recommendations should include $5 million for targeted competitive grants to local agencies (counties and tribes who administer public assistance programs). Approximately $8 million of additional funds are needed for state agency administration of the local agency grants, legal analysis, planning, building out the Integrated Services Delivery Model (ISD) and technology systems that build on integration tied to these recommendations. A total estimated budget of approximately $13 million is needed to effectively move a meaningful effort forward, but does not cover all costs tied to the recommendations. These are long-term efforts involving governance and systems.

Survey respondents noted the need for stronger knowledge of legal parameters for local-level data sharing, parent education and support, and the desire for the state to make additional efforts at the state-level to support data sharing at the local-level. Additionally, respondents were unsure on exact dollar amounts for grants. With these considerations, the following recommendations are proposed:

Recommendation 1: Build on Preschool Development Grant work with the Attorney General's Office to conduct a legal analysis of local-level data sharing. Complete any additional legal analysis that is identified through the process and create a dissemination plan for developed tools such as Memorandums of Understanding, Tennessen Warning templates, analysis of allowable data sharing and more. Work in partnership with Minnesota County Attorneys Association, Minnesota Association of County Social Service Administrators, Local Public Health Association of Minnesota, Minnesota Head Start Association, Minnesota Association for Family and Early Education, Minnesota Association of School Administrators and Early Learning Scholarship Administrators. This collaboration will need to involve the DHS General Counsel and Privacy Office as well as Minnesota Management and Budget.

Recommendation 2: Be responsive to family and parental concerns around data privacy and data sharing. The state should partner with parent advocacy organizations in developing parameters for data sharing work and informing specific projects. Recommendations from those conversations should be implemented and may include tactics such as plain language videos as part of the consent process, plain language Tennessen Warnings, translating videos and written materials into multiple languages and providing training/guidance to navigators to help answer family questions.

Recommendation 3: Expand successful state innovations to include integration of data to reduce family and local-level administrative burden. Specifically, implement the cross-agency expansion of the Department of Human Service's MNbenefits integrated application starting with Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), Early Learning Scholarships and Head Start. In addition, fund DHS work that enables cross-agency data sharing and improved data management.

Recommendation 4: Implement a competitive grant program to both small and large counties who are already making efforts to support local-level data sharing. Up to $5 million should be made available to local-level agencies to create their own approach to improve data sharing. Funds should be allocated for at least a two-year period and tied to reporting on uses to inform ongoing needs and best practice sharing, as well as the human-centered design process in Recommendation 6. A key component of successful local-level collaboration is relationship building and that must be a funded component included within grant requirements, including with local school districts, Head Start and public health.

Recommendation 5: Build, or expand on an existing, successful, multi-agency data governance structure, built upon the Joint Powers Agreement with the Departments of Education, Health and Human Services. Creating solid data governance structures is one of the most complex barriers to linking and sharing early childhood data across agencies, along with funding a cross agency IT solution and development team to analyze solutions. Data governance that is both an organizational structure and process is key to gaining and maintaining the necessary partner agreements. A governance structure must systematically create and enforce policies, roles, responsibilities including procedures for collecting, sharing and publishing data. The governance body will provide a structure for collaborative efforts to continuously improve data quality in a new interagency data system. This would expand upon existing processes and legislative proposals. The work required to implement the scope of effort tied to this recommendation entails cross-agency funding and longer-term financial commitment overall.

Recommendation 6: Engage in human-centered design process with families, counties, local public health, schools, Head Start and community-based organizations to identify barriers to families having access to services and supports as it relates to program collaboration. Generate solutions and identify the resources needed to implement human-centered design processes. This may include considerations heard through engagement for this report, such as the development of a statewide data portal and engaging IT and product managers on how to improve systems integration. This work would build upon existing human-centered design initiatives to support eligibility and services coordination funded by the Preschool Development Grant.

VI. Appendices

Appendix A: Copy of survey and listening session questions

1. Which of the following technology and data sharing practices does your agency or organization currently use for the purpose of coordinating public assistance programs? (Check all that apply)

    a. We encourage families to use the MNbenefits online common application.

    b. We accept applications from MNbenefits.

    c. We use the Shared Master Index (SMI) to coordinate client services across state and county systems.

    d. We use the Integrated Services Assessment Tool (ISAT) with families.

    e. We have legal agreements to share data among the programs *within* our agency / organization.

    f. We have legal agreements to share data *with other* local agencies / nonprofit organizations.

    g. Other ways, please explain: _____

    h. None, we do not share data.

    i. I do not know.

2. Please describe any current cross-agency collaboration and data sharing your agency or organization is currently involved in that supports children and families.

    __ We are not currently part of any cross-agency collaboration.

3. What prevents your agency from sharing family data across programs or agencies? (Check all that apply.)

    a. Legal barriers.

    b. Data is inaccurate or incomplete.

    c. The data we need and collect is different than the data other programs need and collect (lack of alignment).

    d. Our technology or IT systems are not conducive to sharing.

    e. Families do not want or consent to having their data shared.

    f. There is no reason for my agency to share data.

    g. Collaborative relationships have not been established with other agencies for the purpose of sharing data.

    h. Lack of resources (funding, staff, training, physical space, etc.) to develop data sharing processes.

    i. Other barriers, please explain: _____

    j. I do not know.

4. The following types of data are often collected from families. Which types of data are most often unavailable or inaccurate, and can prevent your agency or organization from processing families' applications? (Check up to three)

    a. Individual personal information (e.g., name, race, gender, DOB)

    b. Address and living situation

    c. Information about others in the household

    d. Citizenship status

    e. Employment and income

f. Work or self-employment expenses

g. Assets (e.g., cash, real estate, vehicles, bank accounts)

h. Health care coverage

i. Participation in other programs

j. Other types of data, please explain: _____

k. No certain type of data is difficult to collect. We are able to collect all necessary data from families.

l. I do not know.

5. Please describe ways sharing data across public benefit programs would
    a. Make your job easier: _____

    b. Better serve families: _____

    c. Be more efficient for agencies: _____

    d. Other benefits to sharing data across programs: _____

The state is looking for ways to expand data sharing to better support families. NOTE: This will be done within federal and state laws and regulations to secure and protect data. We have a couple questions for you to consider regarding a potential, voluntary data sharing program. Under this potential program, the state would lead improvements in technology to share data securely.

6. Which of the following would your agency or organization most need to implement a voluntary statewide data sharing program? (Check up to two)
    a. More staff

    b. Staff training

    c. Technology (could include a combination of both state and local solutions)

    d. Data sharing agreements or -legal expertise and/or analysis

    e. Other resources, please explain: _____

    f. No additional resources are needed.

    g. I do not know.

Finally, we have a few questions about your agency or organization and your role.

7. What is your role? (Check one)
    a. Manager

    b. Supervisor

    c. Navigator

    d. Case Worker or Lead Worker (not the right word)

    e. Outreach worker

    f. Other: _____

8. Which of the following state-supervised public benefits do you / your agency or organization administer? (Check all that apply.)
    a. The Child Care Assistance Program (CCAP, DHS)

    b. The Minnesota Family Investment Program (MFIP, DHS)

    c. Parent Support Outreach Program (PSOP; DHS)

d. The Supplemental Nutritional Assistance Program (SNAP, DHS)

e. Medical Assistance (DHS)

f. Early Learning Scholarships through the Minnesota Department of Education (MDE)

g. Home Visiting Programs through the Minnesota Department of Health (MDH)

h. Special Supplemental Nutrition Program for Women, Infants, and Children (WIC, MDH)

i. Energy Assistance and Weatherization (Commerce)

j. Foster Care (DHS)

k. Public early childhood programs (Head Start, Early Childhood Family Education, and public pre-K)

l. School Nutrition (MDE)

m. Child Care and Adult Food Care Program (MDE)

n. Food Distribution on Indian Reservations (FDIPR, Tribal Nations)

o. Other types of benefits, please explain: _____

9. What of the following best describes your agency or organization? (Check one)

a. County

b. School District

c. Tribal Nation

d. Other government agency

e. Community Action Program

f. Faith-based organization

g. YMCA / YWCA

h. Other non-profit agency

i. Other, please describe:

10. What county / Tribal Nation do you work in? (Check all that apply)

11. What other comments or feedback to you have related to voluntary family data sharing program?

12. Would you be willing to participate in a follow-up interview about data sharing and cross-agency collaboration?

a. If so, please provide your name and contact information:

Appendix B: PDG Data Workgroup Results

- Advisory Opinion 20-005 was issued by the Department of Administration Data Practices regarding "access to private and confidential data within the same government entity, as well as sharing of private data between school districts and counties. The Commissioner opined that private or confidential data may be shared with individuals in other programs or units within the same government entity when the individuals have a work assignment that reasonably requires access, and that private data may be shared or exchanged between government entities when authorized by statute or federal law. The Commissioner specifically addressed sharing provisions that MDE referred to in its advisory opinion request."

- A [Coordinating Eligibility and Services Legal Agreement](#) was executed, after thorough consultation with several community partners and local governments. The agreement allows for better eligibility and service coordination at the state level. More information can be viewed in the [Frequently Asked Questions: Coordinating Eligibility and Services](#).
- Efforts have been made to draft a common consent form template in partnership with the Attorney General's Office that may be used by local-level governments and organizations to facilitate data sharing.
- Technical efforts are under way to promote coordination. Including the completion of a thorough discovery process into a potential Universal Developmental Screening Data System. As well as, implementation of Medicaid direct certification with school meals through a USDA pilot program to implement in the 2022-23 school year, as a result, 87,000 kids will receive free school meals that didn't last year and 202,000 will not have to complete the paperwork.

Opportunities to increase data sharing for the benefit of families (MDE, 2019, pg. 4). [Note: The * indicate programs specifically mentioned in the legislation that led to this report.]

Entity and Information	Entity shared with	Possibilities and impact	Difficulties
If DHS or Counties could share MFIP,* CCAP,* or SNAP* eligibility **If Head Start Grantees could share** Head Start Participant information **If County Child Welfare could share** CPS/Foster Care participation **If School Districts could share** free and reduced-priced lunch participant information	With Early Learning Scholarship* Administrators or MDE	We could, identify children who might be eligible for an Early Learning Scholarship Verify Scholarship eligibility, reducing paperwork needed from families Reduce or eliminate multiple applications and duplicate verifications	Which could be difficult because Scholarship funds may not be available in the family's region Even if technically eligible, not all families may be able to use scholarships because they are not using and don't want to change to a 3- or 4-star rated provider or there are no 3 or 4-star providers with space available in their area.
If Early Learning Scholarship Administrators could share Early Learning Scholarship* application data and verifications	With DHS or Counties	We could determine potential eligibility for Scholarship applicants who want to apply for CCAP	Which would be difficult because it's different than Scholarships, Head Start, and District-based programs, CCAP eligibility depends on parent/guardian participation in "approved activities" and

Entity and Information	Entity shared with	Possibilities and impact	Difficulties
If Head Start Grantees could share Head Start Participant information and verifications **If School Districts could share** free and reduced-price lunch participant information		Reduce or eliminate multiple applications and duplicate verifications	requires compliance with child support collection and reporting children's immigration status. Information needed to determine CCAP eligibility can be more detailed than that required for these programs. Procedures would need to be developed to collect this additional information.
If Head Start Grantees could share Head Start Participant information **If School Districts could share** free and reduced-priced lunch participant information **If DHS could share** SNAP,* Medicaid, MFIP* eligibility	With Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)	We could determine certain applicants as income- eligible for WIC based on their participation in certain programs. Reduce or eliminate multiple applications and duplicate verifications.	Which would be difficult because applicants must be enrolled in qualifying programs (i.e., SNAP, Medicaid, Head Start, etc.) or their income must fall under 185% of the federal poverty level to qualify for WIC. If the family is eligible under the Medicaid guidelines but not yet enrolled, the family may be determined presumptively eligible if they plan to apply.

Appendix C: Data systems used by survey participants

Participants in the listening sessions noted the following IT systems and database that help facilitate data sharing within their own agencies or with partner agencies.

- CAP60 software- Information that gets put into CAP60 can go into data management systems so any staff can go look.
- CHILDPLUS – Head Start management database
- Google sheets
- THO/CIS
- DocuSign
- DHS Client index
- MNbenefits - Central application entry point for nine public benefit programs

- Champ Software- Minnesota Department of Health contracts with Champ Software to integrate FHV data collection into Nightingale Notes and PHDOC. Champ Software programs are used by local public health agencies statewide.
- PHDOC- A public health electronic health record system. Minnesota Department of Health previously contracted with PHDOC to integrate family home visiting.
- MNEAS.org - Minnesota Encounter Alert Service that supports care coordination primarily from Medicaid patients
- MIIC system - The Minnesota Immunization Information Connection
- DIRECT- A secure email system of protected health information system

Appendix D: Description of survey respondents

Data were analyzed by size of county in which the respondent reported serving. Counties with over 100,000 residents were designated as "large" for the purposes of this analysis and included 11 counties including the Twin Cities metro area. If a respondent reported serving both a large and a small county, their response was analyzed with the large county data under the assumption that they had access to more resources as a benefit administrator in a large county.

Description of survey respondents

Role	Small county N=91	Large county N=44	Tribal Nation N=6	Total N=177
Supervisor	45%	30%	0%	39%
Manager	18%	45%	50%	27%
Case Worker or Lead Worker	14%	7%	17%	12%
Navigator	1%	0%	0%	1%
Outreach worker	1%	0%	0%	1%
Other (director, coordinator, teacher, IT, all of the above)	21%	18%	33%	21%
Type of agency	**Percent**			
County	58%	41%	0%	50%

School District	16%	27%	0%	19%
Other non-profit agency	11%	20%	0%	13%
Community Action Program	12%	5%	0%	9%
Tribal Nation	0%	0%	100%	4%
Other government agency	1%	5%	0%	2%
YMCA / YWCA	0%	0%	0%	1%
Faith-based organization	0%	0%	0%	0%
Other (heath center)	1%	2%	0%	1%
Benefits respondents administer (those with an * were specifically mentioned in the legislation)	**Percent**			
Supplemental Nutritional Assistance Program (SNAP, DHS)*	56%	48%	83%	53%
The Child Care Assistance Program (CCAP, DHS)*	56%	45%	50%	51%
The Minnesota Family Investment Program (MFIP, DHS)*	56%	43%	50%	51%
Medical Assistance (DHS)*	48%	39%	50%	44%
Foster Care (DHS)	43%	34%	33%	40%
Parent Support Outreach Program (PSOP; DHS)	42%	27%	17%	35%
Public early childhood programs (Head Start, ECFE, Public Pre-K)	26%	41%	33%	31%
Special Supplemental Nutrition Program for Women, Infants, and Children (WIC, MDH)	25%	30%	33%	26%

	Small county	Large county	Tribal Nation	Total
Home Visiting Programs through MDH*	26%	18%	0%	22%
Early Learning Scholarships through MDE*	14%	25%	17%	17%
Energy Assistance and Weatherization (Commerce)	12%	11%	33%	13%
Child Care and Adult Food Care Program (MDE)	12%	7%	17%	10%
School Nutrition (MDE)	3%	11%	50%	8%
Food Distribution on Indian Reservations (FDiPR, Tribal Nations)	0%	2%	33%	3%
Other types of benefits	15%	11%	33%	15%

Appendix E: Survey results data tables

Current technology and data sharing practices

Technology and data sharing practices does your agency or organization currently uses	Small county N=91	Large county N=44	Tribal Nation N=6	Total N=177
We encourage families to use the MNbenefits online common application	69%	57%	50%	62%
We accept applications from MNbenfits	52%	39%	33%	44%
We have legal agreements to share data among the programs WITHIN our agency / organization	36%	39%	17%	32%
We use the Shared Master Index (SMI) to coordinate client services across state and county systems	33%	23%	33%	28%
We have legal agreements to share data WITH OTHER local agencies / nonprofit organizations	31%	36%	0%	28%

	Small county N=91	Large county N=44	Tribal Nation N=6	Total N=177
Other ways (signed releases, release of information forms, and memorandum of understandings)	16%	11%	17%	15%
None, we do not share data	2%	9%	17%	6%
We use the Integrated Services Assessment Tool (ISAT) with families	0%	9%	0%	2%
I do not know	13%	18%	0%	18%
We are not currently part of any cross-agency collaboration.	30%	27%	67%	33%

Barriers to data sharing

What prevents agencies from sharing family data across programs or agencies	Small county N=91	Large county N=44	Tribal Nation N=6	Total N=177
Legal barriers	62%	66%	17%	56%
Families do not want or consent to having their data shared	44%	25%	17%	36%
Our technology or IT systems are not conducive to sharing	30%	39%	67%	31%
The data we need and collect is different than the data other programs need and collect (lack of alignment)	27%	27%	17%	29%
Lack of resources to develop data sharing processes	26%	36%	33%	27%
Collaborative relationships have not been established with other agencies for the purpose of sharing data	19%	23%	33%	20%
Data is inaccurate or incomplete	10%	27%	0%	14%

Other barriers (need for or lack of physically signed release forms, outdated systems, staff default to not sharing, security concerns)	8%	18%	0%	11%
There is no reason for my agency to share data	8%	2%	17%	6%
I do not know	13%	11%	0%	16%
What agencies would MOST need to implement a voluntary statewide data sharing program				
Data sharing agreements or legal expertise and/or analysis	59%	66%	50%	59%
Staff training	56%	36%	67%	49%
Technology (could include a combination of both state and local solutions)	38%	48%	33%	40%
More staff	14%	23%	33%	17%
Other resources (collaboration)	1%	5%	0%	3%
No additional resources are needed	2%	0%	0%	1%
I do not know	9%	7%	0%	10%
Unavailable or inaccurate data elements				
Types of data that are MOST often unavailable or inaccurate, and can prevent your agency or organization from processing families' applications				
Employment and income	48%	41%	50%	44%
Information about others in the household	40%	34%	0%	34%

Address and living situation	25%	23%	33%	23%
Work or self-employment expenses	21%	20%	0%	19%
Assets (e.g., cash, real estate, vehicles, bank accounts)	21%	25%	0%	19%
Participation in other programs	18%	25%	17%	18%
Individual personal information (e.g., name, race, gender, DOB)	10%	7%	33%	9%
Citizenship status	11%	14%	0%	11%
Other types of data	7%	9%	0%	8%
Health care coverage	7%	11%	17%	7%
No certain type of data is difficult to collect. We are able to collect all necessary data from families	11%	9%	33%	13%
I do not know	10%	9%	17%	14%

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