ISBE Data Strategy Policy

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Message from the State Superintendent

Dear Colleagues:

I am pleased to introduce the Illinois State Board of Education's Data Strategy Policy. One of our agency's core functions is collecting and reporting education data to support equity-driven and evidence-based decision-making. This work is foundational to advancing educational outcomes — not only within our agency but also for educators, lawmakers, families, and other partners across the state. I am proud of ISBE's role as a trusted source of rich and reliable information about students, educators, and schools. Strengthening and expanding access to our foundational data systems can enable us to unlock even greater potential to improve student outcomes.

As stewards of this critical information, we must affirm our commitment to high standards for data privacy, responsibility, and access. The goals outlined in this policy document support our collective vision to use data with integrity — to inform decisions, support our communities, and drive meaningful change. They also guide our efforts to enhance data management, governance, and analysis — both within ISBE and in collaboration with our partners.

Thank you for your continued dedication to this important work.

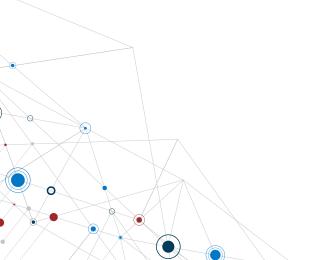
Sincerely,

Dr. Tony Sanders
State Superintendent of Education

Agency Process

The ISBE Data Strategy Policy was developed by representatives from the Software Solutions, Technology Support and Infrastructure, and Data Strategies and Analytics departments (with guidance from the chief information officer and the executive director of the Data, Accountability, and Assessment Center).

- First, the team met with the <u>Statewide Longitudinal Data Systems (SLDS) Grant Program</u> technical support team and reviewed exemplar data strategy policies from other government education agencies.
- Second, the team reviewed the <u>ISBE Strategic Plan</u> to craft a complementary vision, mission, goals, and objectives for an ISBE Data Strategy Policy.
- Third, the team added additional content to the policy (data definitions, agency data roles and responsibilities, data governance framework) to further support the implementation and sustainability of the policy. Content was triangulated with existing agency documentation or best practices resources, when possible.
- Fourth, the team conducted internal focus groups with ISBE education executive directors, the ISBE communication executive director, the ISBE legislative affairs executive director, the ISBE legal director, and ISBE finance directors. The team incorporated the internal agency feedback in the policy to ensure a united message that supports all internal and external programmatic needs for agency data.
- Finally, ISBE executive leadership reviewed and approved the ISBE Data Strategy Policy prior to publication.
- The ISBE Data Strategy Policy will be reviewed no less than annually by the Information Technology Center and the Data, Accountability, and Assessment Center and updated, as necessary.



ISBE Data Strategy Vision

To realize the full potential of state education data and to support data-informed stewardship of resources and policy development, done in partnership with educators, families, and stakeholders as articulated in ISBE's mission <u>statement</u>. Data collected, used, and provided by ISBE is accurate, timely, and available as an indispensable component of providing each and every child with safe and healthy learning conditions, great educators, and equitable opportunities to contribute to society and live life to its fullest potential.

ISBE Data Strategy Misson

Optimize the agency's data resources through a sustainable culture of agencywide data governance, including management, stewardship, security, and analysis. Provide trusted access and insight through resources and policy in support of ethical data governance, transparency, and collaboration.

ISBE Data Strategy Guiding Principles

Three values guide ISBE's data strategy. The agency's responsibility as the steward of student and educator data is to collect and use these data in an ethical manner. Ethical governance is supported by transparency and collaboration to ensure that educators, families, and stakeholders have appropriate and secure access to agency data.

Ethical Governance

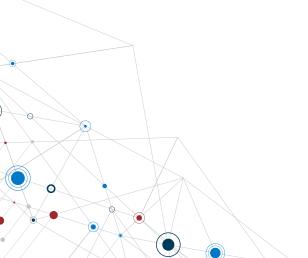
- Support understanding of data purpose and use for all data providers.
- Promote understanding of data privacy best practices and policy.
- Monitor and revise agency data practices for continuous improvement in data quality.
- Ensure appropriate data access and use for all data consumers, including SLDS partners.
- Leverage data to challenge assumptions and root out inequity.

Transparency

- Develop agencywide sources for universal data definitions and business rules.
- Promote understanding through documentation of data policies and processes at all levels and departments of the agency.
- Monitor and fulfill all state and federal mandates related to data collection and reporting.
- Democratize data by enhancing appropriate access to data for internal and external stakeholders.

Collaboration

- Empower internal and external stakeholders to access and analyze agency data.
- Develop data usage at all levels and departments of the agency through engagement and accountability.
- Leverage existing data to support resources and policy decisions.



ISBE Data Definitions¹

Data definitions are provided below to facilitate common understanding and communication among all internal and external stakeholders. These shared terms further institutionalize the understanding of the data roles described in Section VI.

Business Rule

A statement expressing a policy or condition that governs business/program actions and establishes data integrity guidelines for reliability and validity (e.g., all student attendance absences are considered in Chronic Absenteeism metric calculation, etc.).

Confidential Information

Data that may or may not be considered personally identifiable information but cannot be released to unauthorized parties, including the public, for various reasons, most often legal limitations (e.g., individual student test scores, information covered by the Performance Evaluation Reform Act).

Data

Information, in digital form, that can be transmitted or processed by the agency including student, educator, financial, survey, operational, grant, etc. information collected or reported by the agency.

Data Aggregation

Grouping or subset of a data metric calculated or created by the agency for specific analytical insight (e.g., specific student group reporting).

Data Collection

A dataset of elements collected and grouped together based on similar content domain (e.g., Student Information System discipline collection, Employment Information System salary collection, Department of Revenue Tax Data File, etc.).

Data Dictionary

A centralized, version-controlled list of agency data elements, including detail about their collection source system and definition.

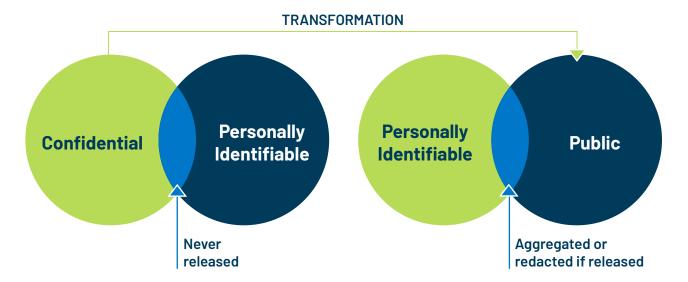
Data Disclosure

Includes permitting access to, revealing, releasing, transferring, disseminating, or otherwise communicating all or any data in writing or by electronic or any other means to any person or entity except the party identified as the party that provided or created the record.

¹Further data terms and definitions will be added in future iterations of ISBE's Data Strategy Policy, as needed. Additional terms and details regarding data security are available in ISBE's internal Data Security Policy.

Data Disclosure Limitation

A method for limiting the disclosure of personally identifiable information through redacting, blurring, or otherwise obscuring a data element or metric associated with a small, distinct, or vulnerable population.²



Data Domain

Policy or program content profile related to various data collections or data reports (e.g., educator data, student data, financial data, assessment data, etc.).

Data Element

Distinct data point collected by the agency for specific mandated need and/or analytical insight (e.g., race/ethnicity, teacher evaluation rating, etc.). Serves a mandated agency need and avoids redundancy.

Data Governance

The established decision-making agency authority for the agency regarding data-related matters, including establishing and monitoring policy, process, implementation, and escalation. Data governance is also the processes for ISBE:

- To define and maintain standards for data privacy and protection.
- To develop and maintain a data dictionary.
- To ensure data accuracy and quality.

Data Metric

Distinct data point calculated or created by the agency for specific mandated need and/or analytical insight (e.g., count, percentage, standard deviation, etc.).

Data Privacy

The right and expectation of an individual or entity that their data be protected from unauthorized disclosure.

²Data disclosure limitation methods can be used when transforming or aggregating confidential and personally identifiable of information for publication.

Data Provider

Source of data collected by the agency (e.g., Local Education Agencies [LEAs], state agencies, etc.).

Data Report

A report of data elements or metrics that is compiled in a similar manner based on content domain (e.g., Unfilled Positions Report, English Learner Statistical Report, etc.).

Data Security

The technical procedures that ensure only authorized and intended parties have access to data.

Data Set

Individual record level data that supports a data report (e.g., all student discipline records included in Top 20% Discipline Report, etc.).

Data System

A system for capture, cleansing, transformation, storage, definition, and use of data that meets agency needs (e.g., I-Star Plus application, Data Warehouse, etc.).

Data User

Stakeholders who utilize data elements and metrics from the agency (e.g., LEAs, state agencies, leadership, etc.).

External Data Stakeholder

All individuals and entities that are affected by the timeliness and quality of ISBE data collections and reporting (e.g., students, educators, schools, districts, communities, media, lawmakers, education policy advocates, etc.).

Personally Identifiable Information

Personally identifiable information (PII) is data elements or data metrics for which disclosure results in the potential identification of an individual. Includes information either alone or when combined with other information. PII includes, but is not limited to, names, addresses, unique identifiers linked to demographic data, program data, financial data, small counts, and other information that can be used to trace an individual's identity.³

Public Information

Information that can be accessed by the public after sufficient data disclosure limitations are applied to remove any PII or confidential information.

Statewide Longitudinal Data System

The Statewide Longitudinal Data System (SLDS) connects data from various state agencies over time and sector.

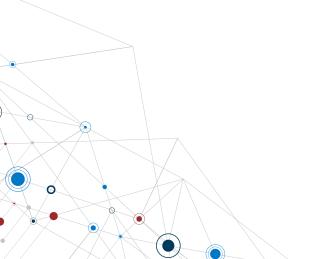
³See Family Educational Rights and Privacy Act (FERPA) for further guidance.

ISBE Data Strategy Goals and Objectives

Culture - Build Shared Data Communication and Culture

Goal 1 of this Data Strategy Policy seeks to extend, improve, and further institutionalize the existing data understanding between agency technical staff (data specialists and data engineers) and agency program staff (data owners and data stewards) as well as with external data providers and stakeholders. Inherent in such a goal is building the agencywide capacity for understanding, using, and properly reporting education data as well as incorporating it into the agency culture. Such a foundation is essential for both promoting data-informed decisions and sustaining understanding across the data life cycle operationally from conceptualizing the data point that is being measured to how that information is collected and reported.

- **A.** Create and sustain documentation of agency data policies, processes, and governance materials in a central and accessible environment, as appropriate, to all data stakeholders.
- B. Determine and implement a data collection and reporting training schedule by technical agency staff (data specialists and data engineers) for agency program subject matter experts (data stewards), program department directors (data owners), and executive leadership.
- C. Determine and implement a program content and policy training schedule by program department directors (data owners) and program department subject matter experts (data stewards) for agency technical staff (data specialists and data engineers).
- **D.** Review and improve quality and quantity of data incorporated into agency decision-making materials through thoughtful planning and clear communication across agency data roles.



Privacy — Increase Protection of Student and Educator Privacy

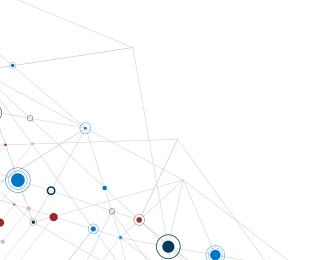
Goal 2 of this Data Strategy Policy seeks to ensure that the agency is constantly evaluating and incorporating best practices and standards to protect student and educator privacy in accordance with state and federal laws. As access to and use of data increases, so must protections against inadvertent disclosure of identifiable student and educator data through externally reported data available through the agency or in conjunction with other publicly available data.

- A. Determine and establish agency data access and data disclosure limitation standards and policies.
- **B.** Determine and implement an agency training schedule pertaining to data access and data disclosure limitation standards and policies.
- C. Enhance and sustain public documentation of agency data sharing agreements.
- **D.** Determine and establish clear guidelines for secure data transfer for all internal and external stakeholders.

Responsibility - Adopt Data Roles and Responsibilities

Goal 3 of this Data Strategy Policy seeks to operationalize and support data roles and responsibilities to ensure sustainability and consistency in data collection and usage agencywide. Clear data roles and responsibilities are a prerequisite for establishing a formal data governance framework, which is crucial for long-term and effective data management.

- A. Evaluate existing agency data governance charter and implement revisions to it. (The current agency data governance charter was implemented in 2011.) The revised charter will include purpose and scope, responsibilities by role, meeting cadence, decision documentation standards, and escalation policy.
- **B.** Implement and sustain agency data governance and SLDS data governance roles and responsibilities for both technical (data specialists and data engineers) and program (data owners and data stewards) roles as well as executive leadership.
- **C.** Establish and maintain agency data roles and responsibilities in Position Action Reports to formalize duties and support the agency's data governance framework.
- **D.** Create new agency data governance coordinator position to provide cohesion and accountability to revised data governance charter and framework.
- E. Create and sustain technical and program data governance training for all agency data roles.
- F. Determine and establish clear responsibilities and guidelines for data retention, archiving, classification, and disposal for all agency data roles and types of data.



Access - Increase Data Access for Stakeholders

Goal 4 of this Data Strategy Policy seeks to continuously work toward improvements in appropriate data access for both internal and external data stakeholders while maintaining protections for individual privacy. The agency's priorities, where not already specified in law, are, in order of priority, the accuracy, privacy, and educational utility of the data. When considering educational utility, the agency order of priority considers both alignment to the ISBE Strategic Plan and influence on student outcomes. This initiative includes access to metadata for monitoring by data providers and appropriate external access for other state agencies and research organizations. Increasing appropriate access to K through 12 education data also is critical for a successful SLDS and for ensuring that policymakers can use data to inform their decisions.

- **A.** Evaluate and revise current public resources for agency Data Sharing Review Board policy and processes to prioritize data sharing initiatives that serve improvements in education.
- **B.** Evaluate and revise public resources for data collection processes to improve quality for both data submitters and data consumers.
- **C.** Create and sustain an agencywide data asset catalog, including a data dictionary, to increase reliable data access and valid data usage.
- **D.** Evaluate external stakeholder relationships and develop a data collaboration outreach plan to increase engagement.

ISBE Data Roles and Responsiblities

Individual-level and committee-level agency data roles, as well as the data governance structure, are provided to facilitate transparent responsibility and accountability.

- Individual agency data roles and responsibilities are provided. These responsibilities include serving on agency data committees within the overall data governance structure.
- Data committee roles and responsibilities are provided. These include membership, purpose, and specific responsibilities for each committee within the governance structure.

Internal Data User

- Agency staff who use data to inform agency decisions and policies.
- Responsibilities include:
 - Use data in ways that are most appropriate to the policies or topics in question (or seek out the data stewards or data owners to identify the most appropriate data and use cases).
 - Use data in ways that are consistent with the security best practices for ensuring student and educator privacy.
 - Reach out to data stewards and data owners if they have requests or questions regarding agency data.

Data Governance Coordinator

- Coordinator of data governance framework across the Data Steward Committee, Data Governance Committee, and Data Policy Committee.
- Responsibilities include:
 - Provide cohesion across the committees and assists data owners on advising and recommending new data policy to executive leadership for approval.⁴
 - Attend Data Policy Committee meetings and responsible for facilitation, advisement, and recommendations for committee agenda topics and issues as needed.
 - Attend Data Governance Committee meetings and responsible for facilitation, advisement, and recommendations for committee agenda topics and issues as needed.
 - Attend Data Steward Committee meetings and responsible for facilitation, advisement, and recommendations for committee agenda topics and issues as needed.

^{&#}x27;Currently, ISBE does not have a data governance coordinator position. Long-term sustainability will require ISBE to add this new position to ensure the agency's data governance framework is fully implemented and monitored. Many State Education Agencies have added a new full-time data governance coordinator position to maintain and sustain their framework.

Data Attorney

- Agency attorney with detailed understanding of state, federal, and best practices regarding education data.
- Responsibilities include:
 - Advise on data elements that are included for external release in data sharing agreements, advise
 on redaction needs for Freedom of Information Act (FOIA) requests, determine permissibility of
 potential data sharing agreements, review and amend existing data sharing agreements, review
 related new legislation and policies related to data, determine which data elements should and
 should not be collected by agency.
 - Draft legal data sharing agreements (e.g., an agreement needed for data used in the Illinois Report Card, an intergovernmental agreement with another state agency, or an agreement with an outside research organization project, etc.).
 - Attend Data Policy Committee meetings and responsible for advisement and recommendations for committee agenda topics and issues as needed.
 - Attend Data Governance Committee meetings and responsible for advisement and recommendations for committee agenda topics and issues as needed.
 - Attend Data Steward Committee meetings and responsible for advisement and recommendations for committee agenda topics and issues as needed.

Data Steward

- Program department staff members with detailed knowledge (e.g., subject matter expert) about program policies and the data domain needed to support the programs (e.g., Standards and Instruction Department/coursework in Student Information System/advanced academic programs, etc.).
- Agency staff who monitor data domains based on program and policy profile of expertise and relevance. Each data element collected and used by the agency must have an associated data owner and data steward.
- Responsibilities include:
 - Assist data owners in monitoring and reviewing day-to-day data operations, but final responsibility and approval for data is assigned to data owners.⁵
 - Translate program specific initiatives into clear requirements for agency data specialists and data engineers.
 - Formulate program department project delivery strategies, establish milestones/schedules, and report on data quality.

⁵Data owners also can be data stewards.

- Perform program/business requirements analysis and workflow analysis, and work with data specialists and data engineers to write functional specifications for data collections and data reports.
- Provide program and policy insight and guidance for data specialists and data technicians performing ad hoc data requests.
- Act as a subject matter expert regarding data sharing agreement requests being considered by the Data Sharing Review Board.
- Attend Data Governance Committee meetings and responsible for advisement and recommendations for committee agenda topics and issues as needed.
- Attend Data Steward Committee meetings and responsible for escalation and approvals for committee agenda topics and issues as needed.⁶

Data Specialist

- Technical data staff members with advanced technical knowledge about data compilation, data calculations, and data analysis.
- Agency staff who are identified by management (most frequently in the Data Strategies and Analytics Department) based on technical skills and resource availability to provide technical assistance for data projects.
- Responsibilities include:
 - Create and analyze data collections and reports based on requirements provided by data stewards along with comprehensive documentation for future reference.
 - Provide documentation or specific scenarios to improve data quality.
 - Design and test data dashboards for visual data analysis.
 - Advise on data use matters pertaining to data sharing agreement requests made to the Data Sharing Review Board.
 - Fulfill data sharing agreements approved by the Data Sharing Review Board.
 - Attend Data Governance Committee meetings and responsible for advisement and recommendations for committee agenda topics and issues as needed.
 - Attend Data Steward Committee meetings and responsible for advisement and recommendations for committee agenda topics and issues as needed.

Data Engineer

• Technical IT staff members with advanced technical knowledge about database management, data collection software applications, and data security.



- Agency staff who are identified by management (most frequently in the Software Solutions
 Department or Technology Support and Infrastructure Department) based on technical skills and
 resource availability to provide technical assistance for data projects.
- Responsibilities include:
 - Design, develop, and test software applications for data collections for the agency based on guidance provided by data stewards.
 - Develop and test data dashboards for visual data analysis.
 - Design, develop, and maintain application interfaces for secure data communications within and across agencies.
 - Maintain infrastructure and data in accordance with latest IT industry standards and implement security measures to protect data.
 - Administer data and daily backups for disaster recovery.
 - Advise on security matters pertaining to data sharing agreement requests made to the Data Sharing Review Board.
 - Fulfill data sharing agreements approved by the Data Sharing Review Board.
 - Attend Data Governance Committee meetings and responsible for advisement and recommendations for committee agenda topics and issues as needed.
 - Attend Data Steward Committee meetings and responsible for advisement and recommendations for committee agenda topics and issues as needed.

Data Owner

- Program department directors or executive directors.
- Agency staff who manage data domains based on program and policy profile of expertise and relevance. Each data element collected and used by the agency must have an associated data owner and data steward.
- Responsibilities include:
 - Provide direction and approval for a given domain of data, from collection through usage, regardless
 of where those data reside across the organization. This single point of responsibility and authority
 for each domain of data is essential to make informed, consistent, organization-wide decisions
 about the data.
 - Facilitate data-based decision-making by executive leadership by providing useful and accurate data from the data domain.
 - Approve of program-related decisions related to data collections, reporting, usage, and access for the data domain.

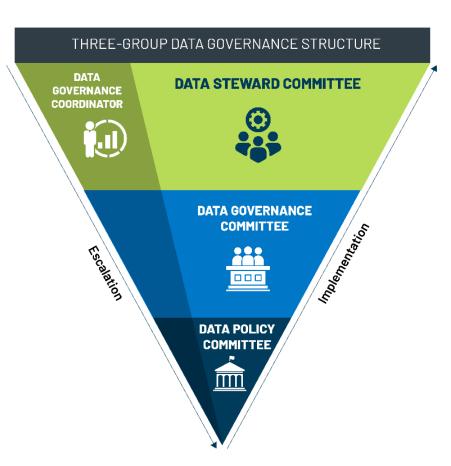
- Manage the construction and administration of instruments, such as assessments and surveys (e.g., academic achievement tests [Assessment Department], climate survey [Wellness and Student Care Department], Educator Shortage Survey [Educator Effectiveness Department], etc.).
- Maintain compliance with related laws and policy as related to assigned data domain.
- At Data Sharing Review Board, act as a subject matter expert for data sharing agreement request
 forms and submit data sharing agreement requests, including requests for amendments and
 renewals, when those data sharing agreements are necessary for agency function or are in the
 agency's interest. Data owners also may be voting members of the Data Sharing Review Board.
- Attend Data Policy Committee meetings and responsible for advisement and recommendations for committee agenda topics and issues as needed.
- Attend Data Governance Committee meetings and responsible for escalation and approvals for committee agenda topics and issues as needed.

Executive Leadership

- Communicate planned data usage in policy documents to data owners for feedback and documentation.
- At least one member of executive leadership will be a voting member of the Data Sharing Review Board
- Attend Data Policy Committee meetings and responsible for escalation and approvals for committee agenda topics and issues as needed.

Data Governance Structure

Three-tier framework includes
 Data Steward Committee, Data
 Governance Committee, and Data
 Policy Committee.⁷



Data Steward Committee

- Membership: Data governance coordinator, data stewards, data specialists, and data engineers.
- Purpose is to facilitate communication, issue resolution, and provide organization regarding agency data across program and technical staff.

⁷An agency data governance handbook regarding specific data policies and procedures will be developed to more fully document ISBE's data governance framework. The proposed three-tier framework is modeled after the Institute of Education Sciences SLDS Guide: Single Agency Data Governance: Key Roles and Responsibilities (December 2019).

- Responsibilities include:
 - Model adherence to data policies and procedures.
 - Propose data policies to Data Governance Committee (e.g., data classification schema).
 - Propose major data-related agency procedures to Data Governance Committee.
 - Communicate any data issues, plans, regulations, and policies from program department or technical department.
 - Resolve issues escalated by program and technical departments.

Data Governance Committee

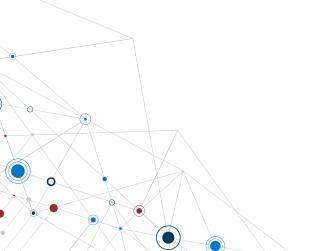
- Membership: Data governance coordinator, data owners, data stewards, data specialists, and data engineers.
- Purpose is to support data owners in decision-making related to assigned data domain and establishment of agency data procedures.
- Responsibilities include:
 - Model adherence to data policies and procedures.
 - Propose major data-related policies to Data Policy Committee (e.g., data risk management policy).
 - Approve major data-related agency procedures proposed by Data Steward Committee.
 - Assign data stewards, data specialists, and data engineers to Data Steward Committee.
 - Hold program and technical departments accountable for participating in Data Steward Committee
 - Resolve issues escalated by Data Steward Committee.

Data Policy Committee

- Membership: Data governance coordinator, executive leadership, and data owners.
- Purpose is to support executive leadership in decision-making related to agency data and establishment of agency data policies.
- Responsibilities include:
 - Model adherence to data policies.
 - Approve agency data policies proposed by Data Governance Committee.
 - Approve major data-related decisions proposed by Data Governance Committee.
 - Hold program and technical departments accountable for agency data policies.
 - Hold program and technical departments accountable for participating in Data Governance Committee
 - Resolve issues escalated by Data Governance Committee.

Last Reviewed or Updated:

Date	ISBE Staff	ISBE Dept	Updates
	Edobor Efam, Rae Clementz, Maureen Font, Madan Damodaran, David Williams, Logan Woods, Ryan Ehlke, Cheng Chu, Smitha Rhodes, and Donna Schroeder	Software Solutions, Technology & Infrastructure, Data Strategies & Analytic	Drafted
4/28/25	Maureen Font and Logan Woods	Data Strategies & Analytics	Updates after focus group discussions with ISBE Executive Directors
5/19/25	Jason Helfer	Instructional Education	Review 1/comments
6/19/25	Ted Wolf	Communications	Copy Edit
7/2/25	Jason Helfer	Instructional Education	Review 2/comments
7/3/25	Jason Helfer	Instructional Education	Review 3/comments
7/8/25	Ted Wolf	Communications	Copy Edit
9/9/25	Jason Helfer	Instructional Education	Approved 9/9/25 to publish Version 1



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