

## Racism-Free Schools Law and Bullying Prevention Data Collection Guidance July 2025

The Illinois State Board of Education (ISBE) is tasked with implementing data provisions of two recently enacted Public Acts -- the Racism-Free Schools Law ([Public Act 103-0472](#)) and Bullying Prevention ([105 ILCS 5/27-23.7](#)), as modified for data collection per [PA 103-0047](#). These Public Acts require that, starting with the 2024-25 school year, all Illinois school districts; charter schools; and nonpublic, nonsectarian elementary or secondary schools collect, maintain, and submit to ISBE non-identifiable data pertaining to incidents of bullying, discrimination, harassment, and retaliation.

### Timelines:

The reporting period for this collection is August 1 – July 31, annually. Data is due to ISBE each year by August 15, which allows for a correction window following the end of each reporting period.

Accordingly, we notified you last August that the reporting period for the first year of this new data collection would be August 1, 2024 -- July 31, 2025, with a deadline to submit of August 15, 2025. The reporting period for the 2025-26 school year opened August 1.

### Data Collection and Reporting Requirement:

Data reported to ISBE must be non-identifiable, meaning it should not include any information that can be used to identify individual students or staff members. Non-identifiable data includes aggregated statistics and counts of incidents without personal identifiers, such as names, student IDs, or other unique identifiers. Data must be collected for each verified allegation of bullying and each reported allegation of harassment, discrimination, and retaliation, and reported within this template. Locally, you will collect personally identifiable information, as you will need the relevant details to investigate and respond appropriately to the allegations. However, when reporting this data to ISBE, only the fields identified in this template should be provided. Text description fields must not contain any personally identifying information.

### Submission of Data to ISBE:

ISBE previously provided an Excel spreadsheet designed to help schools and districts report this data for the 2024-25 school year. The spreadsheet is structured to capture the necessary

information while ensuring that all data remains non-identifiable. To reiterate: The spreadsheet should be used for data reporting of the verified allegations of bullying as required under 105 ILCS 5/27- 23.7, as well as the data required for reported allegations of discrimination, harassment, or retaliation as required by the Racism-Free Schools Law.

School districts; charter schools; and nonpublic, nonsectarian elementary or secondary schools must use the previously provided Excel spreadsheet to complete the required submission for the 2024–2025 school year. This may be submitted via the “Send ISBE a file” link (see previous instructions attached) or it may be submitted through a new system in IWAS titled “Bullying Racism Free Schools Act.” Please refer to the webinar ISBE hosted on July 30, 2025, for more information on signing up for and using the system.

Beginning with the 2025–26 school year and for all subsequent years, school districts must submit the required information through the IWAS system.

### **What is a “verified allegation of bullying”?**

A verified allegation of bullying is a complaint that if investigated would meet the definition of “bullying” found in [Section 27-23.7\(b\)](#) of the School Code. This means schools and districts must collect this data regardless of the outcome to determine if an act of bullying occurred.

Refer to the following definition of bullying to determine if a student’s complaint is a verified allegation of bullying:

*“Bullying” includes “cyber-bullying” and means any severe or pervasive physical or verbal act or conduct, including communications made in writing or electronically, directed toward a student or students that has or can be reasonably predicted to have the effect of one or more of the following:*

- 1) Placing the student or students in reasonable fear of harm to the student’s or students’ person or property;*
- 2) Causing a substantially detrimental effect on the student’s or students’ physical or mental health;*
- 3) Substantially interfering with the student’s or students’ academic performance;*  
*or*
- 4) Substantially interfering with the student’s or students’ ability to participate in or benefit from the services, activities, or privileges provided by a school.*

*Bullying, as defined in this subsection (b), may take various forms, including without limitation one or more of the following: harassment, threats, intimidation, stalking, physical violence, sexual harassment, sexual violence, theft, public humiliation, destruction of property, or retaliation for asserting or alleging an act of bullying. This list is meant to be illustrative and non-exhaustive.*

*“Cyber-bullying” means bullying through the use of technology or any electronic communication (including without limitation any transfer of signs, signals, writing,*

*images, sounds, data, or intelligence of any nature) transmitted in whole or in part by a wire, radio, electromagnetic system, photoelectronic system, or photo-optical system (including without limitation electronic mail, Internet communications, instant messages, or facsimile communications). "Cyber-bullying" includes the creation of a webpage or weblog in which the creator assumes the identity of another person or the knowing impersonation of another person as the author of posted content or messages if the creation or impersonation creates any of the effects enumerated in the definition of bullying in this Section. "Cyber-bullying" also includes the distribution by electronic means of a communication to more than one person or the posting of material on an electronic medium that may be accessed by one or more persons if the distribution or posting creates any of the effects enumerated in the definition of bullying in this Section.*

### **What is considered discrimination?**

Discrimination is the unequal treatment of individuals or groups based on certain protected characteristics. Discrimination may take various forms, including, but not limited to, the denial of opportunities, denial of access to services, or taking adverse action against an individual or group based on their protected characteristics.

### **What is considered harassment?**

Harassment includes any unwelcome conduct by either a student toward another student or school personnel toward a student based on the student's actual or perceived protected characteristic/basis that has the purpose or effect of substantially interfering with a student's educational performance or creating an intimidating, hostile, or offensive educational environment.

### **What is considered retaliation?**

Retaliation is an adverse action taken against an individual because they engaged in a legally protected activity, such as asserting or alleging an act of bullying, discrimination, or harassment. This includes any negative or punitive response aimed at someone for reporting, opposing, or participating in an investigation or proceeding related to bullying or other protected activities.

### **Are there differences in the reporting for bullying and the Racism-Free Schools Law?**

There are differences in the two laws, but ISBE has combined its process for collecting data to streamline and reduce the burden on schools and districts. In order to appropriately collect this data, schools will need to determine if an allegation is based upon the following:

- Sexual harassment
- Discrimination or harassment on the basis of race, color, or national origin

- Discrimination or harassment on the basis of sex
- Discrimination or harassment on the basis of religion
- Discrimination or harassment on the basis of disability
- Retaliation
- Verified allegation of bullying (non-cyber related)
- Verified allegation of bullying (cyber related)

Schools will be allowed to make multiple choices to best fit the allegation.

**What is the difference between an allegation of bullying and an allegation of harassment?**

An allegation of bullying is any allegation that meets the definition of bullying as specified in [105 ILCS 5/27-23.7](#). An allegation of harassment is any allegation that involves discrimination or harassment based on protected characteristics specified in the [Illinois Human Rights Act](#) (IHRA).

In some cases, an allegation may be classified as both bullying and harassment if the alleged behavior involves the same protected characteristics recognized by both laws. Schools may select multiple allegation types for one allegation.

Protected Characteristics under Sec. 27-23.7	Protected Characteristics under the Illinois Human Rights Act
<ul style="list-style-type: none"> <li>• Race</li> <li>• Color</li> <li>• Religion</li> <li>• Sex</li> <li>• National origin</li> <li>• Ancestry</li> <li>• Physical appearance</li> <li>• Socioeconomic status</li> <li>• Academic status</li> <li>• Pregnancy</li> <li>• Parenting status</li> <li>• Homelessness</li> <li>• Age</li> <li>• Marital status</li> <li>• Physical or mental disability</li> <li>• Military status</li> <li>• Sexual orientation</li> <li>• Gender-related identity or expression</li> <li>• Unfavorable discharge from military service</li> </ul>	<ul style="list-style-type: none"> <li>• Race*</li> <li>• Color*</li> <li>• Religion*</li> <li>• Sex*</li> <li>• National origin*</li> <li>• Ancestry</li> <li>• Age</li> <li>• Order of protection status</li> <li>• Marital status</li> <li>• Physical or mental disability*</li> <li>• Military status</li> <li>• Sexual orientation</li> <li>• Pregnancy</li> <li>• Reproductive health decisions</li> <li>• Unfavorable discharge from military service</li> </ul> <p><b>* The Racism-Free Schools Law only requires entities to report discrimination or harassment on the basis of these characteristics. However, harassment based</b></p>

<ul style="list-style-type: none"> <li>• Association with a person or group with one or more of the aforementioned actual or perceived characteristics</li> <li>• Any other distinguishing characteristics</li> </ul>	<p><b>on other protected characteristics under the Illinois Human Rights Act also may be considered bullying under Section 27-23.7.</b></p>
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**How does a school report on multiple incidents, multiple offenders, or multiple victims of bullying?**

Bullying is a temporal event that occurs at a specific time and place (even if the place is virtual). A school or district should only report one verified allegation of bullying even if there are multiple victims or offenders. For example, an allegation that two offenders were bullying three victims on the school bus at 7:30 a.m. should be reported as one verified allegation of bullying. If the same offenders and victims are involved in an incident in the lunchroom at 11:30 a.m., this should be reported as a second verified allegation of bullying. The number of victims and the number of offenders will need to be included on the spreadsheet, but this will only be counted as one verified allegation of bullying per incident.

**Should schools only report “founded” allegations of discrimination, harassment, or retaliation?**

No, any reported incident that falls under the identified categories should be included in your submission. Entities will be able to categorize the alleged incident as founded, unfounded, or investigation pending on column M on the spreadsheet.

Please note that the bullying provisions require districts/schools to submit additional data related to “founded” incidents of bullying (e.g., if the school determines an allegation is a “verified allegation of bullying,” it is considered a “founded” allegation).

**Should incidents be reported more than once, since at one point they will be “pending” and later they will be “founded” or “unfounded”?**

No, the same incident should NOT be reported more than once. The allegation status can be updated throughout the reporting period within the same incident ID. ISBE understands that some allegations will still be pending when the data is submitted on August 15.

**What is required if there are no incidents of bullying, discrimination, harassment, or retaliation to report?**

In the event that there are no reportable incidents, a data upload is NOT required. Any school district; charter school; or nonpublic, nonsectarian elementary or secondary school that has zero incidents reported after the August 15, 2025, deadline will receive a written notice from ISBE. The entity will then have 14 calendar days from the date of the notice provided to submit a signed statement from the district superintendent or chief school administrator confirming that there was no data to report.

**Consequences for Failure to Report:**

Any school district; charter school; or nonpublic, nonsectarian elementary or secondary school that fails to submit the required data by the August 15, 2025, deadline will receive a written notice of noncompliance from ISBE. Pursuant to 23 Ill. Admin. Code 1.295(h)(4), the entity will then have 14 calendar days from the date of the notice to submit the required data or provide a signed statement from the district superintendent or chief school administrator confirming that there was no data to report.

If the entity fails to submit the data within that 14-day period, ISBE will publish the entity’s name on its website as noncompliant. In addition, ISBE may refer the entity to the Illinois Department of Human Rights to initiate civil rights charges pursuant to Section 5A-102 of the Illinois Human Rights Act (775 ILCS 5/5A-102).

**Data Elements and Descriptors from the Excel Template:**

<b>Column</b>	<b>Data Element</b>	<b>Cell Value</b>	<b>Description</b>	<b>Notes</b>
A	Incident ID	N/A	Incident IDs will be generated automatically by ISBE once data is submitted. However, if you wish to include an ID for your own record keeping, please begin with “1” and number accordingly.	
B	RCDTS	15-character RCDTS Code	The code for the school at which the incident took place.	
C	Date allegation received by the school	mm/dd/yyyy	The date on which school administrators and/or complaint managers received the complaint/report.	

D	Date of alleged incident	mm/dd/yyyy	The date on which the alleged incident occurred.	
E	Sexual harassment	Y/N	Mark "yes" or "no" if the incident in question qualifies as sexual harassment.	
F	Discrimination or harassment on the basis of race, color, or national origin	Y/N	Mark "yes" or "no" if the incident in question qualifies as discrimination or harassment on the basis of race, color, or national origin.	
G	Discrimination or harassment on the basis of sex	Y/N	Mark "yes" or "no" if the incident in question qualifies as discrimination or harassment on the basis of sex.	
H	Discrimination or harassment on the basis of religion	Y/N	Mark "yes" or "no" if the incident in question qualifies as discrimination or harassment on the basis of religion.	
I	Discrimination or harassment on the basis of disability	Y/N	Mark "yes" or "no" if the incident in question qualifies as discrimination or harassment on the basis of disability.	
J	Retaliation	Y/N	Mark "yes" or "no" if the incident in question qualifies as retaliation against an individual for alleging or asserting an act of discrimination, harassment, or bullying, or participating in the complaint process.	

K	Verified allegation of bullying (non-cyber related)	Y/N	Mark "yes" or "no" if the incident in question qualifies as a verified allegation of bullying (non-cyber related).	A verified allegation of bullying (non-cyber related) is any allegation that meets the definition of bullying provided in 105 <a href="#">ILCS 5/27-23.7</a> .
L	Verified allegation of bullying (cyber related)	Y/N	Mark "yes" or "no" if the incident in question qualifies as a verified allegation of bullying (cyber-related).	A verified allegation of bullying (non-cyber related) includes any allegation that meets the definition of bullying and/or cyber-bullying provided in <a href="#">105 ILCS 5/27-23.7</a> .
M	Allegation status	1 = Founded 2 = Unfounded 3 = Investigation Pending	The status of the allegation at the time data is submitted to ISBE.	This section can be updated throughout the reporting period, but the final submission should reflect the status of the allegation at the time of submission.
N	Investigation pending additional information	Text Entry	Brief description of the status of the investigation, including the anticipated closing date for the investigation.	Information included here should remain non-identifiable.
O	Date investigation resolved	MM/DD/YYYY	Date that the school/district completed its	

			investigation of the incident.	
P	None	Y/N	If the alleged bullying was based on one or more of these actual or perceived characteristics, mark "yes" or "no" under any characteristic that applies. For example, a student was bullied because he is homeless. In this scenario, the user would mark "Y" under "Homelessness" and "N" under all remaining categories.	<b>Only required for verified allegations of bullying (cyber or non-cyber).</b>
Q	Race	Y/N	Was the bullying based on the victim's actual/perceived race?	
R	Color	Y/N	Was the bullying based on the victim's actual/perceived color?	
S	Religion	Y/N	Was the bullying based on the victim's actual/perceived religion?	
T	Sex	Y/N	Was the bullying based on the victim's actual/perceived sex?	
U	National origin	Y/N	Was the bullying based on the victim's actual/perceived national origin?	
V	Ancestry	Y/N	Was the bullying based on the victim's	

			actual/perceived ancestry?	
W	Physical appearance	Y/N	Was the bullying based on the victim's physical appearance?	
X	Socioeconomic status	Y/N	Was the bullying based on the victim's actual/perceived socioeconomic status?	
Y	Academic status	Y/N	Was the bullying based on the victim's actual/perceived academic status?	
Z	Pregnancy	Y/N	Was the bullying based on the victim's actual/perceived pregnancy?	
AA	Parenting status	Y/N	Was the bullying based on the victim's actual/perceived parenting status?	
AB	Homelessness	Y/N	Was the bullying based on the victim's actual/perceived homelessness?	
AC	Age	Y/N	Was the bullying based on the victim's actual/perceived age?	
AD	Marital status	Y/N	Was the bullying based on the victim's actual/perceived marital status?	
AE	Physical or mental disability	Y/N	Was the bullying based on the victim's actual/perceived physical or mental disability?	
AF	Military status	Y/N	Was the bullying based on the victim's actual/perceived military status?	

AG	Sexual orientation	Y/N	Was the bullying based on the victim's actual/perceived sexual orientation?	
AH	Gender-related identity or expression	Y/N	Was the bullying based on the victim's actual/perceived gender-related identity or expression?	
AI	Unfavorable discharge from military service	Y/N	Was the bullying based on the victim's unfavorable discharge from military service?	
AJ	Association with a person or group with one or more of the aforementioned actual or perceived characteristics	Y/N	Was the bullying based on the victim's actual/perceived association with a person or group with one or more of the aforementioned actual/perceived characteristics?	
AK	Any other distinguishing characteristics	Y/N	Was the bullying based on any other distinguishing characteristics?	
AL	School adhered to bullying policy	Y/N	Did the school adhere to its bullying prevention policy implemented under 105 ILCS 5/27-23.7?	
AM	Parent notification within 24 hours	Y/N	Were the parents/guardians of all students involved in the alleged incident notified of their students' involvement in the incident within 24 hours?	

AN	Number of bullying incidents referred to the complaint manager	Numeric		
AO	Number of safety plans issued to students as a result of the outcome of the bullying investigation	Numeric	How many safety plans were issued to students as a result of the bullying investigation?	
AP	Other pertinent information to the investigation	Text Description	Include any other information relevant to the investigation. Information should be non-identifiable.	
AQ	Findings related to the bullying investigation	Text Description	Include a brief description of the findings from the bullying investigation. Information must be non-identifiable.	
AR	Victim count for this incident	Numeric	How many victims were involved in the incident of bullying?	
AS	Bully count for this incident	Numeric	How many bullies (perpetrators) were involved in the alleged incident?	
AT	IDHR training occurred	Y/N	Did the staff involved in this incident undergo IDHR's <a href="#">Racism-Free Schools Law Training</a> or an equivalent training?	