

Illinois Unified System Planning Project

Deliverable #11: Identify position risks and issues that may arise during system development (example legal, administrative, technical, and political).

Deliverable #12: Provide recommendations for necessary interagency agreement, policy, business and staffing changes necessary to implement data sharing.

Prepared for:

**Governor's Office
Of
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Table of Contents

I. Introduction	3
II. Illinois Early Childhood Governance Landscape	4
III. RTTT Early Learning Challenge Review	24
IV. Risk Analysis	29
V. Key Findings & Recommendations	40

I. Introduction

To support the development, implementation, and ongoing operations of the Unified System, an organizational structure and capability must be developed that has the necessary human and financial resources, is representative of the participating agencies, and includes a set of guidelines, policies, and/or business practices that specify the way in which the Unified System and products of the System will be managed. Collectively, these capabilities are necessary to ensure the overall success of the development, implementation, and ongoing growth and operation of the Unified System. The notion of an organizational or governance structure is especially relevant when considering how the Unified System will involve the ongoing participation of various State agencies as well as the integration of their early childhood data systems into the integrated environment envisioned as the Unified System.

Participating early childhood agencies and programs have established capabilities that support the management of data and data systems. However, existing system management and oversight capabilities have been defined within the context of individual systems or at best, individual agencies. Having said this, established capabilities are not adequately structured to support the management of the Unified System from design, implementation, and ongoing system operations perspectives. The Unified System is essentially a system of systems supporting multiple agencies that will require a more complex organizational model. Therein lies the challenge of the Unified System and its approach to management (or governance) of the system. Today, the agencies participating in the Unified System Planning Project (USPP) lack collaborative capacity, structure and other mechanisms necessary to support the Unified System.

To address this limitation, this report provides an overview of the current and planned data system management and governance capabilities in Illinois and suggests a structure that builds on these capabilities by offering a recommended governance structure to support the unique needs of the Unified System. To this end, this document provides key findings and recommendations regarding an approach to leveraging existing capabilities and to developing new governance and system management capabilities. To accomplish this, the process summarized below was followed.

- **Current Landscape Review:** Existing governance and IT related capabilities of participating agencies including relevant legislation were reviewed. The documented review offers a high level overview of the organizational structure and capacity of the current landscape and provides a starting point to structure recommended governance requirements for the Unified System.
- **Race to the Top (RTTT) Review:** The governance and organizational requirements documented within the RTTT grant application were reviewed. While the organizational and governance capabilities described in the RTTT application expand beyond those required for the Unified System, it is important that Unified System governance requirements leverage and complement that vision.
- **Risk Analysis:** Considering the early childhood governance and information technology structures that exist or are in development, potential risks and issues to developing, implementing, and sustaining the Unified System were identified within the following areas: legal, administrative, technical, and political.

- **Findings and Recommendations:** A gap analysis between existing capabilities, the RTTT vision, and the Unified System governance and system management requirements is documented and reviewed.

II. Illinois Early Childhood Governance Landscape

Staff interviews were conducted with several stakeholders that currently oversee existing data systems, including representatives from the Department for Children and Family Services, the Department of Human Services, and the Illinois State Board of Education. Representatives of the Illinois Early Learning Council, Illinois Health Information Exchange Authority, The Framework Project, The Illinois Longitudinal Data System, and the Illinois Early Childhood Asset Map were also engaged. Integral to the interviews was a review of the governance structures in place to oversee the development, implementation, and administration of data systems and also, the extent to which policies and procedures have been established for collaboration and data sharing among these organizations. The following focus areas are used to provide a consistent framework for the report.

- **Leadership:** sustained and well qualified leadership that provides strategic direction, effective oversight, and facilitates motivation and partnerships to achieve results.
- **Organizational Capacity:** clear and strong strategy, knowledgeable and effective project management, well defined and supported operations and business practices, and capable and qualified human resources.
- **Data Governance:** clearly defined roles, responsibilities, policies, and business processes for managing and sharing data to support goals and strategy while maintaining individual privacy and security.
- **Communication and Collaboration:** clearly defined mechanisms for sustained communication to inform and promote collaboration among participating individuals, programs, agencies, and other stakeholders including the public.
- **Information Technology:** a technical architecture and system design that is flexible and facilitates integration and interoperability, as well as providing value-added business services to the early childhood workforce, program administrators, and researchers.
- **Financial Management:** funding supports, financial sustainability plan, and financial management policies, procedures, and resources.

A. Illinois State Board of Education

The Illinois State Board of Education (ISBE) has a substantial established and planned capacity for collaboration, data collection, data management and reporting. To date, ISBE has relied heavily on both federal grant funding and contractual resources to reach its current level of systems implementation. Going forward, however, as external funds diminish, adequate resourcing for systems maintenance will pose a challenge and will not allow the agency much latitude for further systems maintenance, improvement, or expansion of data collection. However, established systems such as the Student Information System and the associated business systems that support it, as well as planned systems such as the Illinois Longitudinal

Data System (ILDS) Data Warehouse and its evolving technical support and collaborative business models demonstrate significant capacity that is closely aligned with the needs of the Unified System.

ISBE Capabilities

The Illinois State Board of Education has defined a **Data Governance Program** to facilitate improved data quality, coordinated and improved access to and protection of sensitive data, and seamless operations in which programs and data are aligned. The agency plans to implement the program during the first half of calendar year 2013. The Data Governance Program is founded on the Data Quality Campaign's six key components of successful data governance.¹ The **Data Governance Committee** (DGC) is envisioned as the main governing body regarding data collection, access, and use at ISBE. It will be created to support ISBE's mission by promoting the appropriate use of data to inform decision-making, and ensuring data quality, accountability, and timeliness. The DGC is made up of Data Owners from each ISBE Division that delegate responsibilities to data managers, data users, and programmers. The DGC will be managed by the **Data Governance Coordinator** who oversees issues related to data governance and monitors the overall status of data collection, reporting, and use at ISBE. The Data Governance Coordinator will also provide strategic planning to determine ISBE's data priorities and promote continuous quality improvement of the DGP.

Data sharing requests, from researchers for example, will be managed by the **Data Request Review Board** (DRRB) a sub-group of the DGC. The DRRB will be responsible for the legal, efficient, and purposive management of data requests for personally identifiable information from external parties.

In addition to the Data Governance Program managing data within ISBE, a governance structure has been set up specifically for managing data within ILDS. The **ILDS Data Advisory Committee** has been established under the authority of the P-20 Longitudinal Education Data System Act and in accordance with the Illinois Longitudinal Data System Project cooperative agreement with the U.S. Department of Education. The ILDS Data Advisory Committee consists of a broad group of stakeholders who advise ISBE and its education partners on data use and data management. This group helps to define the data gathering and reporting requirements for ILDS and advises on data coordination across agencies. The Committee will also play a role in the identification of requirements for building the ILDS Enterprise-wide Data Architecture and Education Enterprise Data Warehouse. The Committee also addresses matters assigned by the ISBE Project Sponsors or ILDS Project Manager, as well as matters brought forth for consideration by Committee members.

As the term of the ILDS grant comes to a close, ISBE is currently working with other State agencies to consider the creation of an interagency data governance body through

¹ The Data Quality Campaign's six key components of successful data governance are:

1. An agency wide data governance committee with program leaders and a clear mission.
2. Support of executive leadership for data governance.
3. A data governance director to monitor the big picture and promote continuous improvement.
4. A clear data architecture system that governs data collection, access and use.
5. Clear security policies that govern access to data.
6. A state data audit system to assess data quality, validity, and reliability.

intergovernmental agreement. This data governance body will likely include stakeholders in an advisory role, and, if so, may take the place of the ILDS Data Advisory Committee.

Information technology within ISBE is managed by their **Office of Information Technology**. The Office of Information Technology is responsible for the design, development, and maintenance of automated data processing systems for ISBE, regional offices and school district clients; provides systems analysis, computer programming, database design and administration, systems testing and evaluation, and user training; supports ISBE technology helpdesk services, hardware/software provisioning, network infrastructure, servers, webinar conferencing and video teleconferencing; and coordinates mainframe processing.

The **IT Steering Committee** in ISBE provides strategic leadership for IT through the alignment of IT strategic objectives and activities with Agency strategic objectives and processes; prioritizes IT investment initiatives and deliver final approvals on proposed IT projects; ensures open communication between the IT Division and the other functional units of ISBE so as to promote collaborative planning; reviews and approves major project deliverables; and reduces project risks and optimizes project performance. Voting members of the Committee include the:

- Chief Operating Officer (Executive Sponsor)
- Director, Information Technology (Chair)
- Deputy Superintendent/Chief Education Officer
- Chief Financial Officer
- General Counsel
- Chief Performance Officer

Illinois Longitudinal Data System Governance and Data Sharing Planning

ISBE and the collaborating organizations of the P-20 Council have identified the need to formalize a governance structure in support of the Illinois Longitudinal Data System. With support from Northern Illinois University, Office of Education System Innovation, the group has taken preliminary steps to define a formal governance structure and also, to define a conceptual framework for state-wide data sharing among all participating state systems. While this work is currently under development, significant progress has been made on both governance as represented in figure 1 below, and a conceptual framework for interagency data sharing as represented in figure 2. Ongoing plans involve the finalization of these approaches to governance and data sharing; presentation of the plan to the Governor's Office, state agency leadership, the P-20 Council, and interested outside stakeholders; development of an inter-governmental agreement; and drafting of the necessary legislation (if required) to authorize its implementation.

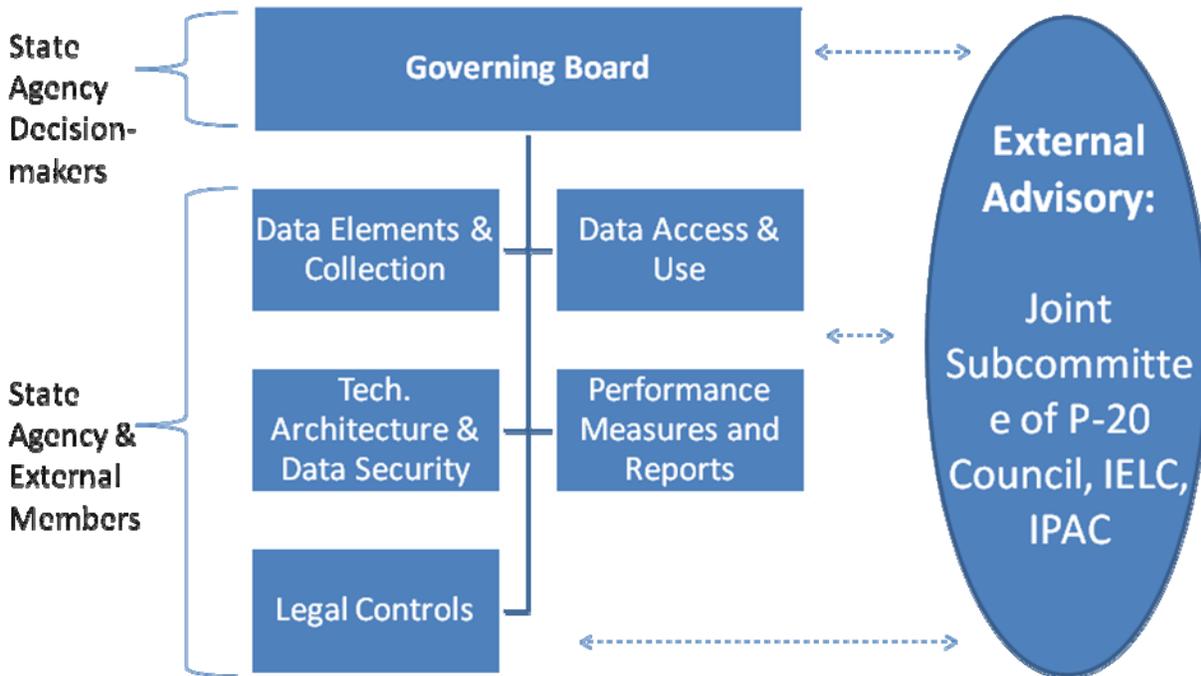


Figure 1

Standing committees will be appointed as listed below and will report to the governing board. Relationships with external advisory committees will be developed and sustained as necessary to ensure the success of the organization.

- **Governing Board** – Will provide collaborative and representative leadership of participating agencies.
- **Data Elements & Collection** – Will promote the use of data standards and data exchange among participating systems and the ILDS.
- **Technical Architecture & Data Security** – Will promote the use of technology standards and best practices to maximize the use of technology and ensure the protection of data on a systems-wide level.
- **Legal Controls** – Will be responsible for standardizing data sharing agreements and process, and for ensuring that the existing federal and state legal mandates are considered in a consistent way.
- **Data Access & Use** – Will manage overall data access policy and process.
- **Performance Measures** – Will ensure that ILDS supports the education and workforce communities by providing access to features and functionality that directly support monitoring, evaluation and quality improvement.

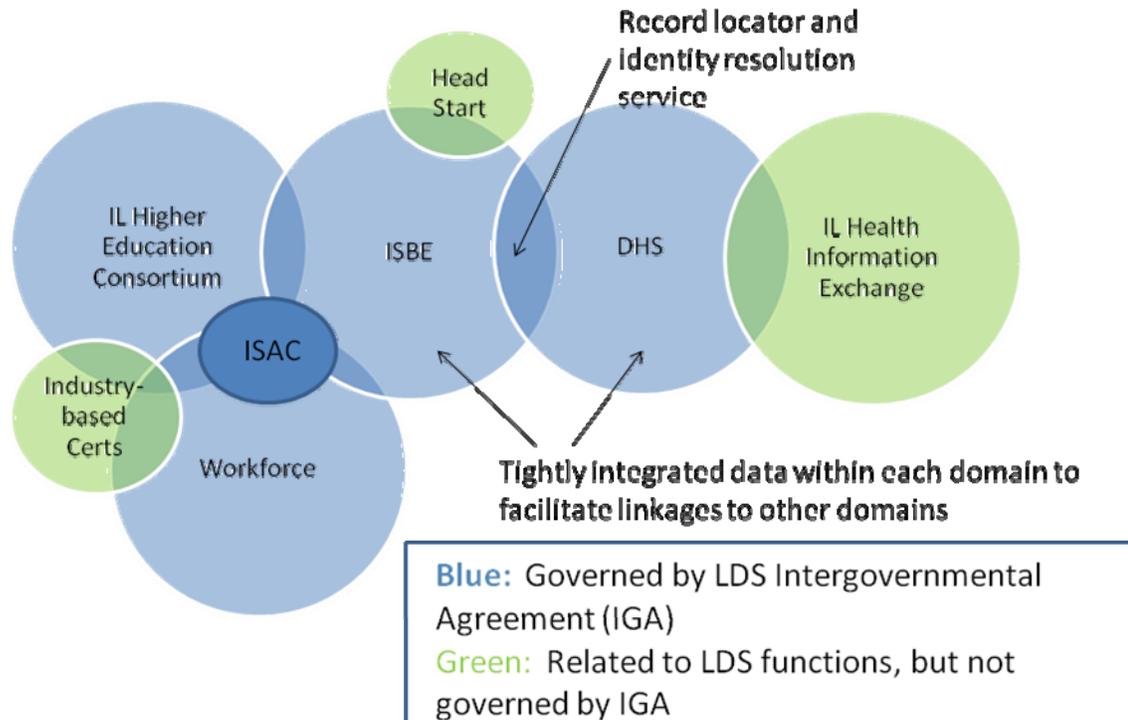


Figure 2

The ILDS Data Sharing Framework as shown in figure 2 depicts the relevant “domains” of education, workforce and human services data that are relevant to the ILDS. The diagram is intended to demonstrate that each domain is responsible for the systems and data within their domain, and the extent to which data from a particular domain will be made available to the other participating domains. The governance body will be charged with ensuring that the appropriate collaborative, policy, legal and technical requirements are met to promote data sharing and effective utilization of resources. Key features of the diagram include:

- IHEC, Workforce, ISAC, ISBE and DHS domains are each responsible for compliance with the overall approach to systems integration and data sharing.
- Loosely affiliated domains including Head Start, ILHIE and Industry-based certification organizations will be integrated with the ILDS framework as required to meet the expectations and requirements of the relevant parties.
- The required technology mechanisms such as record locator service, identity resolution service, and data exchange capabilities (federated model of data sharing) will be developed and made available to participating domains/agencies.

B. Illinois Department of Human Services: The Framework Project

The Framework Project is a collaborative effort among seven state agencies to develop an integrated, streamlined, and efficient healthcare and human services delivery system that offers

easy access to high-quality services provided and/or funded by the State. The Framework Project system will support application, intake, eligibility, screening, benefits determination, case management, and decision-making support functions. Ultimately, the Framework Project will expand access to services, enable data-driven decision making, improve service outcomes, and capture the efficiencies that are possible with current technology.

A governance and management structure is in place for planning, developing, and implementing The Framework Project. The Framework Executive Steering Committee (chaired by the State CIO), the Planning Governance Board (which includes program and IT staff from collaborating State agencies), the Advisory Council (consisting of an array of external stakeholders), and the State Project Management Office work together to provide leadership and management functions throughout the project. The **Framework Executive Steering Committee** provides executive leadership and sign off on all matters of project finance and systemic policy changes. The State CIO chairs the Committee and members of the Committee include the Senior Policy Advisor for Health Care Reform, the Statewide Director of Health Reform Implementation the Directors of the Partner Agencies, representatives from the Governor's Office of Management and Budget, Central Management Services, the Bureau of Communications and Computer Services, and the Framework Project Director.

The **Planning Governance Board** includes program and IT staff from the member agencies. The board will assist the planning vendor with coordinating the planning activity among the three Medicaid/Healthcare Projects and the other Framework projects to ensure alignment and collaboration.

The **Advisory Council** will make recommendations to the Framework Planning Governance Board and the Executive Steering Committee, and represent the service needs of multiple constituencies. The Advisory Council representatives will provide leadership for workgroups initiated by the Framework Planning Governance Board. Its members will include a broad spectrum of external stakeholders.

The **Project Management Office** will provide planning for and day-to-day management of overall project including supervising the work of the vendor(s), staffing the Governance Board and Advisory Council, and convening cross-agency or cross-function meetings to promote collaboration. Staffing will include a Project Director, a Project Manager, program, business and technical leads, communication and change management leads, and clerical staff. The participating state agencies will identify liaisons to the PMO.

DHS has hired a 3rd party vendor to support project planning. The **planning vendor** will be responsible for engaging the Medicaid/Healthcare projects and determining the extent to which those efforts can be leveraged for the requirements of The Framework. After core shared capabilities are defined, The Framework planning vendor will be responsible for engaging the various lead agencies, identifying other core functions as required, and planning for the development, implementation and support of The Framework capabilities. The planning vendor's activities of The Framework Planning Project include: performing a business process review and formalizing business requirements; developing system technical requirements; and providing recommendations for system development, implementation, and quality assurance.

To ensure ongoing quality assurance and oversight throughout the implementation of the system, the State will contract an external **QA vendor** to perform activities such as: verification that

project governance activities are occurring as planned; evaluation of project progress, resources, budget, schedules, workflow and reporting mechanisms; and quality assurance review of work products developed by the implementation vendor(s).

To promote sustained communications and collaboration throughout The Framework Project, the State has developed and is conducting a stakeholder engagement process. This process will assist in informing service recipients and providers and other Framework stakeholders about the project's conceptual design, engage stakeholders to solicit their input to improve the system, and enhance stakeholder ownership in and commitment to the long-term sustainability of the Framework Project.

C. Illinois Health Information Exchange

Illinois has begun implementation of a statewide health information exchange (HIE) with the goal to ensure that every health care provider in the state has access to an HIE and every Illinois patient can enjoy the benefits of electronic health records (EHRs), regardless of their geographic location or choice of provider or payer. By integrating and exchanging health care data, the Illinois HIE is intended to improve health care outcomes, improve quality of care, and reduce costs.

The **Illinois Office of Health Information Technology** (OHIT) promotes the development of health information technology, increases the adoption and meaningful use of electronic health records, assure the privacy and security of electronic health information, and direct the State's HIE implementation efforts. OHIT will drive the policies and perform or facilitate the business and technical operations functions associated with Illinois' Strategic and Operational Plan. It will continue to serve as the coordinating body for all activities related to the State's efforts to facilitate statewide HIE, build HIT capacity and accelerate the adoption of EHRs.

The **Illinois Health Information Exchange Authority** (the Authority) is the governance body that oversees the Illinois State Health Information Exchange activities. The Authority consists of a nine-member Board of Directors to govern the operation of a statewide HIE and to "promote, develop and sustain health information exchange at the State level." Directors appointed to the Authority must be chosen with regard to a broad geographic representation and represent a wide spectrum of health care stakeholders. The Directors of the Illinois Departments of Healthcare and Family Services, Human Services, Insurance, and Public Health and a representative from the Office of the Governor all serve as ex-officio members of the Authority. The primary responsibilities of the Authority are to:

- Establish an HIE to promote and facilitate the sharing of health information;
- Foster the widespread adoption of EHR and participation in the statewide HIE;
- Administer the HIE using secure and cost-effective systems and processes;
- Adopt standards and requirements for the use of health information consistent with state and federal laws;
- Establish minimum standards for accessing the statewide HIE and ensure appropriate security and privacy protections are in place.

In terms of formal governance processes, The Authority has developed a comprehensive approach to governance which includes key leaders across the State, representing a wide variety of stakeholders within the health care industry. The structure includes a Board of Directors, an Advisory Committee and workgroups and committees as deemed necessary by the Board. According to the Authority bylaws, The Authority has substantial responsibilities associated with the transformation of the State's healthcare system through the promotion of strategies and technologies that promote collaboration, interoperability of data systems and data exchange, and the introduction of new standards of performance.

To facilitate the development, implementation, and ongoing operations of the statewide HIE, important management elements have been thoroughly considered and planned. Specific initiatives include:

- A **risk management process** has been developed using of standard project management principles. OHIT has identified and assessed the impact of domain-specific risks to the statewide HIE project. These risks have been prioritized (based on likelihood and impact) to formulate mitigation strategies.
- A **budget and resource allocation process** has been established. The allocation of resources between and among OHIT, the Authority and other State agencies providing support for the attainment of the goals set forth in this Plan will be determined by the Director of OHIT/State Health IT Coordinator, in consultation with the ONC, as necessary and appropriate. Such allocations will be made in accordance with state budget statutes and regulations.
- OHIT is working with CMS to apply an Enterprise Program Management Framework to the project management activities for the statewide HIE and is intended to ensure that commitments are accurately captured, aligned, and managed via project-specific milestones.
- Financial management of the project is the responsibility of the **OHIT Chief Financial Officer**. Fiscal control policies are in place to ensure fiscal integrity and appropriate oversight of the program, including multiple level approval and regular documentation of expenditures.
- The **ILHIE Communication Plan** that identifies key strategies to inform, educate, and engage health care providers and organizations, the public, and other key stakeholders about the benefits of EHR adoption and use, and HIE-related activities in Illinois. The statewide HIE is expected to work closely with the two RECs in Illinois (IL-HITREC and CHITREC) to ensure that all communication, education and outreach related activities for patients and providers are coordinated and consistent.
- The Health Information Technology **Regional Extension Center (REC) Program** was developed to assist health professionals in implementing and becoming "meaningful users" of electronic health records. Two Illinois consortiums were awarded grants under this program, and they are currently working with thousands of providers across the state in their transitions from paper to electronic records.
- The **ILHIE Data Security and Privacy Committee** was formed to address issues associated with the use and protection of health information, medical records, and other health data in

the possession or control of the ILHIE. The Committee's role is to review, evaluate and recommend ILHIE data privacy and security policies, and to oversee the development of new ILHIE data privacy and security policy recommendations with appropriate collaboration with State of Illinois stakeholders, policy developers and implementers.

D. Illinois Department of Children and Family Services

The Illinois Department of Children and Family Services (DCFS) is committed to helping families by increasing their ability to provide a safe environment for their children and by strengthening families who are at risk of abuse or neglect. The Department's primary responsibility is to protect children and strengthen families through the investigation and intervention of suspected child abuse or neglect by parents and other caregivers.

Currently, the Department shares data with several State and federal agencies, State universities, and private agencies or vendors. Data sharing activities are guided by memorandums of understanding, interagency agreements, State or federal laws which require the sharing of specific data, and requirements and privacy conditions that DCFS includes in agency contracts to private providers and organizations. Data sharing requests are overseen by the **DCFS Office of Information Technology Services (OITS)**. Every request for information or data is reviewed by OITS who in turn checks with the owner of the data within DCFS regarding the data requested as well as with DCFS' Legal Counsel to assure the requested information can be shared within the parameters of existing agreements, contracts, or law/rules/policy. As this data spans several operational areas of the Department, and the confidentiality of the data is addressed within those policy and procedures throughout the Agency, as well as several State and federal laws, there is no one specific or central process on the release of information.

In addition to overseeing data sharing requests, the DCFS OITS maintains and supports a wide variety of technology systems, coding standards, and guidelines, including operating systems, hardware environments, software products, and DBMS models to host and support over 120 systems that have been developed and operated as far back as 1978. Currently, DCFS OITS is working toward the consolidation and elimination of many of the Legacy and older operating systems and software products through a constant parallel rewriting of older applications and software into the main core operating systems and software. It is expected that this transition will take years to complete. Thus, the preferred technology standards are that all new development be done in the latest Microsoft operating system and software models available to DCFS based on sufficient budget and the ability to procure and deploy upgrades as available.

E. Office of Early Childhood Development

The State of Illinois supports many early learning programs for children from birth to age five and their families. The role of the Governor's Office of Early Childhood Development (OECD) is to strengthen Illinois' efforts to establish a comprehensive, statewide system of early childhood care and education. The OECD provides support and leadership for an integrated system of early childhood services. It also coordinates and guides the work of the Illinois Early Learning Council (IELC).

Illinois Early Learning Council

The Illinois Early Learning Council is composed of gubernatorial and legislative appointees representing a broad range of constituencies, including schools, child care centers and homes, Head Start, higher education, government agencies, the General Assembly, business, law enforcement, foundations, and parents. The Council's goal is to meet the early learning needs of children from birth to age five and their families by establishing a high-quality, accessible, and comprehensive statewide early learning system. The Council guides collaborative efforts to coordinate, improve, and expand upon existing early childhood programs and services, including making use of existing reports, research, and planning efforts. The broad purpose of the Council is to (1) implement recommendations of previous and ongoing early childhood efforts and initiatives; (2) develop multiyear plans to address gaps and insufficient capacity and to ensure quality; (3) reduce or eliminate policy, regulatory, and funding barriers; and (4) engage in collaborative planning, coordination, and linkages across programs, divisions, and agencies at the State level.

Much of the work of the IELC is accomplished through its committees and workgroups. The **Executive Committee** serves as a leadership team comprised of committee co-chairs and a small number of at-large members from the Council. In addition to the Executive Committee, the IELC includes the following additional committees as represented in the diagram on the following page:

- **Home Visiting Task Force:** The long-term goals of the task force are to expand access to evidence-based home visiting programs for all at-risk children; improve the quality of home visiting services; and increase coordination at the state and local levels.
- **ELC Program Standards and Quality Committee -** The committee plans to utilize and build on the work of key Councils, such as the IDHS Child Care Advisory Council, IDCFS Licensing Advisory Council, Professional Development Advisory Council and Infant and Toddler and Community Systems Work Groups to assure all goals within the ELC Strategic Plan are met.
- **ELC System Integration and Alignment Committee -** The Systems Integration and Alignment Committee will work to improve coordination and integration across early childhood programs and systems to address the comprehensive nature of children's healthy development and readiness for school.
- **ELC Data, Research and Evaluation Committee -** The goal of the Data, Research, and Evaluation Committee will be to guide the development and implementation of a unified data system; research initiatives; and quality program and system evaluations – in order to provide better information to support and further improve early childhood programs throughout the state.

- ELC Family and Community Engagement Committee** – The focus of the Committee includes improve access and serve the neediest and hardest to reach families; promote parent involvement and leadership in family life, schools and communities; promote communications with the public and policy-makers and the media; and to expand program space/capacity in underserved communities.

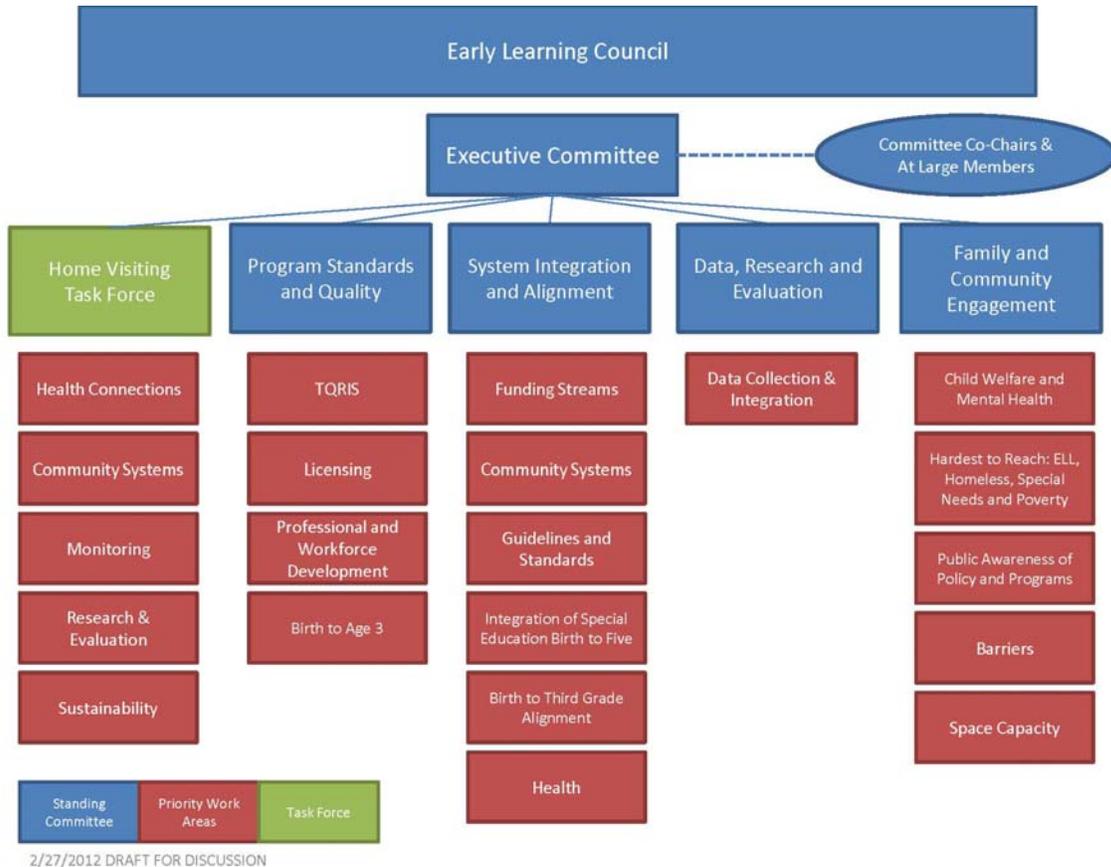


Figure 3

F. Head Start & Early Head Start

Head Start and Early Head Start programs are federally-funded programs administered by public and private agencies throughout the State. Participating organizations are awarded grants from the Office of Head Start (OHS), within the Administration of Children and Families of the Department of Health and Human Services. Local Head Start grantees provide the services as described in the Head Start Performance Standards and in accordance with the Head Start Act of 2007. The Office of Head Start is responsible for oversight of these grantees and ensures that performance standards are met and the best quality of care is provided to enrolled children. Currently in Illinois there are 48 grantee agencies administering Head Start and Early Head Start programs throughout the State. Grantees have significant flexibility in how they administer and

implement programs and services according to their individual community needs, size and cultures.

Although Head Start is not administered by states, each state, including Illinois, has a **Head Start-State Collaboration Office**. In Illinois, the Head Start Collaboration Office is housed within the Illinois Department of Human Services. The Director of the Illinois Head Start Collaboration Office (ILHSCO) serves as a liaison between the State and the local Head Start grantees throughout Illinois to promote collaboration, coordination, and alignment of Head Start programming, services, and standards with those of other early childhood education and care programs in the State.

The **Illinois Head Start Association (ILHSA)**, a non-profit membership organization, represents the Head Start community in Illinois, including grantee agencies, directors, staff, and parents. The Illinois Head Start Association provides advocacy on behalf of Head Start, children, and families in Illinois and offers professional development opportunities.

To facilitate collaboration among Head Start grantees and external data sharing initiatives, such as the Unified System, the Head Start community and the ILHSA have recently proposed a model for governing data sharing activities through the formation of the **Illinois Head Start Data Cooperative**. Through this model, ILHSA will serve as a broker of Head Start data and as a liaison between the State and the Head Start grantees. Through the cooperative, all Head Start and Early Head Start grantees in Illinois will provide their data to ILHSA, who will develop and maintain a common data set containing child-level demographic and developmental data and program/site data. Individual data agreements between ILHSA and each Head Start grantees will need to be established for the grantee data housed in the common data set to be exchanged in the Unified System. Data agreements will also need to be established between ILHSA and the State agencies participating in the Unified System.

G. Illinois P-20 Council

The Illinois P-20 Council was established to identify needed reforms to develop a seamless and sustainable statewide system of quality education and support from birth to adulthood. The Council consists of a diverse membership that includes state agency leaders, educators, school administrators, local government representatives, advocacy organizations, employers, representatives of the philanthropic community, parents and lawmakers. Members submit their collective recommendations on ways to better support an effective and comprehensive education system to the Governor and the General Assembly each year.

There are five standing committees of the Council which address specific areas of education as well as two executive committees which ensure the coordination and alignment of P-20 initiatives. The standing committees include **Data, Assessment and Accountability Committee; Family, Youth, and Community Engagement Committee; Teacher and Leadership Effectiveness Committee; School, College, and Career Readiness Committee; and Finance and Governance Committee**. Membership of the standing committees is open to the public in order to provide avenues for input from an even broader base of stakeholders.

In addition to the standing committees, the **Joint Education Leadership Committee (JELC)**, which is chaired by the Lieutenant Governor and primarily consists of state agency directors, is

charged with overseeing the alignment and implementation of P-20 initiatives. Lastly, the **Coordinating Committee** is comprised of co-chairs of the five core committees to identify opportunities for leveraging resources and streamlining the work of Council and its committees.

The P-20 Council makes annual recommendations to the Governor and the General Assembly. The Council issued its first round of recommendations in January of 2011 featuring ten recommendations for making progress towards the goal of improving the educational attainment of Illinoisans. The FYCE Committee held workshops across the State to share the report with community groups, parents, and local schools as well as provide a forum for discussion at the community level. The JELC produced an implementation matrix to monitor progress on these recommendations. The Council has also launched a website (www.p20council.illinois.gov) which not only makes their work more accessible but provides an additional opportunity for public feedback and a platform for sharing other helpful resources and information about educational initiatives, policy and best practices, and emerging research.

H. Illinois Early Childhood Asset Map

The Illinois Early Childhood Asset Map (IECAM) is funded by ISBE and IDHS to provide a comprehensive picture of early care and education needs and services in Illinois by combining up-to-date demographic information with early childhood program information for state agencies, Head Start, and private sector caregivers. It is a single point of contact for obtaining childcare demographic and service information in Illinois, for use by state agencies, private organizations and the general public. It is a policy tool that can be used to transparently allocate childcare and early education resources efficiently and effectively.

Data from IECAM is made available to participating agencies and the public. Staff at IECAM work with stakeholders and funding agencies to determine what they feel is publicly available data. In addition, there is a website for ISBE and IDHS to access any other data that may be inappropriate for public access. IECAM has quality assurance processes to check the accuracy of data before addition to the database. IECAM engages a technical advisory group on an ad hoc basis.

IECAM staff work with stakeholders, often on an annual basis but ad-hoc as needed, to determine which data variables to include in IECAM. There is a **formal data sharing agreement with DHS, and informal agreements exist with ISBE and Head Start**. Common Education Data Standards are used where appropriate and a data dictionary exists.

IECAM has established relationships and business processes with a number of early childhood agencies including ISBE, DHS, Head Start, INCCRRA, the Bureau of Early Intervention and others. Participating agencies upload early childhood data on a periodic basis. IECAM staff scrubs and verify the data before loading it into the IECAM database. Following this process, reports are made available to authorized users via the web site.

Specific efforts are made to gather feedback from stakeholders regarding IECAM utility including online surveys and direct inquiry with stakeholders and funders. Technical support is provided to funders and stakeholders on the use of IECAM as needed and in regularly scheduled Webinars. A technical manual has been developed and is available for internal staff use.

A quarterly report regarding IECAM activities is submitted to ISBE and DHS for presentation to the Early Learning Council. IECAM staff support ISBE in reporting relevant information to the General Assembly.

While the operational and collaborative models employed by IECAM are less formal and much smaller than those being developed in the other initiatives reviewed in this report, they represent a success story that should be reviewed and considered as similar Unified System business capabilities are defined and developed. In practical terms, the Unified System operational and collaborative requirements will most likely fall somewhere in between IECAM and the larger models employed by ISBE, DHS and ILHIE.

I. Legal and Legislative Considerations

Health Insurance Portability and Accountability Act: The Health Insurance Portability and Accountability Act (HIPAA) addresses the use and disclosure of protected health information by “covered entities” (those that are obligated under the HIPAA legislation) including health care providers, health insurers, and health care data exchange clearinghouses. As currently conceived, the Unified System will be collecting a limited amount of health-related information but will not be sharing data electronically as referenced in HIPAA. More specifically, the organization that operates the Unified System will not qualify as a “covered entity” under HIPAA. Therefore, HIPAA does not apply directly to the organization.

However, to the extent that the Unified System may collect protected health information (PHI) from covered entities, the organization that manages the Unified System may qualify as a “business associate” of those covered entities and may therefore, be obligated to meet HIPAA requirements through the those relationships. As a “business associate”, the organization that manages the Unified System may have to demonstrate compliance with HIPAA regulations.

Family Educational Rights and Privacy Act: The Family Educational Rights and Privacy Act (FERPA) protects information contained in public education records about parents and students. Similar to the HIPAA regulations, FERPA states that public education agencies may not institute any policy permitting the release of personally identifiable records without prior written consent from parents, or from students who have reached the age of majority. As with HIPAA, there are explicit exceptions to the “prior written consent” rule. One of these exceptions is the provision for sharing of information with organizations conducting studies for or on behalf of the educational agency or institution. Such studies must serve an administrative purpose of the educational agency, including developing, validating, or administering predictive tests, administering student aid programs, and improving instruction. These studies must be conducted in a manner that does not permit the personal identification of students and their parents, and researchers must agree that the information will be destroyed when no longer needed for the purpose for which it is provided.

It is expected that the Unified System will contain public education information on children and their parents. Thus, the organization that manages the Unified System will be responsible for implementing policies and procedures that ensure compliance with FERPA.

State Legislative Acts: The Illinois State Legislature has approved legislation for a series of initiatives supporting collaboration and integration of organizations, information systems and

data in varying efforts aimed at improving the State’s educational and healthcare systems. These acts are reviewed here for reference but to the extent that these efforts have resulted in formalized collaborations or organizations, those groups have already been reviewed and will simply be referenced in this section.

- **Illinois Longitudinal Data System: Public Act 96-0107 (ILDS)**

The P-20 Longitudinal Education Data System Act (Public Act 96-0107) defines the strategy for the Illinois Longitudinal Data System (ILDS), including the rationale for the system; authorities, roles, and responsibilities; and specifications and collaborations to enable the system. The ILDS Act addresses the need for comprehensive and reliable data to inform decision making related to enhancing the State education system and ensuring well-prepared students as they enter higher education or the workforce. According to the Act, the ILDS will be based on national models and guidelines to facilitate a system that monitors individual students from early learning programs through postsecondary education and into employment all the while managing data and information securely and in accordance with all legal requirements protecting the privacy and confidentiality of student information.

The Unified System is intended to mirror and overlap with the ILDS to some extent and therefore the Act references the need to ensure ILDS efforts are coordinated with those of the IELC as related to the Unified System. In this vein, specifications outlined in the Act are intended to enable the ILDS and are relevant to the development of the Unified System. For example, ISBE is authorized to establish and operate the ILDS in collaboration with other agencies and institutions. In effect, considering the Unified System to be a similar initiative and collaboration, ISBE is qualified to collaboratively operate the Unified System as well.

This Act also specifies for the ILDS to develop and use unique statewide student identifiers. As the Unified System is developed, the approach to unique identifiers used by ILDS should be considered. Alignment of unique identifiers across systems (the ILDS and the Unified System) will be critical to enabling the Unified System. Furthermore, the Act mandates ISBE to solicit stakeholder input to inform the development of the ILDS in the areas of data ownership, data use, data access, confidentiality, and reporting. Such stakeholder input is critical to the support and perceived value of the Unified System as well and therefore the approaches and findings for ILDS may serve as a model for developing the Unified System.

- **P-20 Council: Public Act 95-0626**

This act defines the P-20 Council as a statewide coordinating council to assess and make recommendations concerning education (from preschool through graduate school) policy, systems, and goals in a coordinated fashion. The Act defines an organizational structure for the P-20 Council to be chaired by the Governor and to include a broad spectrum of members representing various sectors including government, business, and education. The Act tasks the Council with promoting a collaborative approach to leverage existing capacity and infrastructure and better align all education related efforts throughout the State. Considering the P-20 Council provides an existing established structure and collaborative process for assessing and addressing education initiatives and policy in the

State, the Council offers the Unified System a model of cross-sector and interagency governance and organizational capacity. Furthermore, recommendations put forth by the P-20 Council may influence the realm of the Unified System and therefore it may be necessary to include representation on behalf of the Unified System in the P-20 Council meetings.

- **Office of Early Childhood Development: Executive Order 1008; Illinois Early Learning Council: Public Act 93-0380**

The Governor created the Office of Early Childhood Development (OECD) by Executive Order in 2009 to establish a dedicated role and staff to facilitate cross-system collaboration with the goal of advancing a more unified early childhood system and to guide the efforts of the Illinois Early Learning Council (IELC). Previously, Public Act 93-0380 was enacted to create the IELC which was intended to serve in an advisory capacity to coordinate and guide a comprehensive early learning system. The Act defines the organization and membership composition of the IELC that is representative of state agencies and across public and private sectors. The mission of the OECD and the intent of the IELC align with the goals of the Unified System. Furthermore, the cross-sector inter-agency representation in the IELC offers a potentially appropriate advisory body and/or governance structure for the Unified System. It is not clear of the extent of the IELC's decision making authority which may or may not pose a barrier to fully enabling the Unified System.

- **Office of Health Information Technology (OHIT): Executive Order 1001**

In 2010, the Governor issued Executive Order 1001 to create the Office of Health Information Technology (OHIT) to oversee the State's development and implementation of health information technology initiatives, including the creation of a statewide health information exchange (HIE). It is expected that the Unified System will include limited health information and what is included will be captured from human services programs. Thus, the proceedings of OHIT and the State's health information technology initiatives, including the statewide HIE will likely not influence the development, implementation, and operations of the Unified System. That said, it may be prudent for a representative of OHIT to participate in the Unified System governance in some capacity, perhaps as an external advisor, to ensure potentially relevant initiatives or policies of OHIT are considered and vice-versa. This may be particularly relevant in the area of capturing a more complete set of child identifying records that may be available via the ILHIE as well as the approach to managing of the associated unique identifiers of the children of Illinois.

- **Illinois Health Information Exchange and Technology Act and "The Authority": Public Act 96-1331**

Public Act 96-133, which puts forth a framework for exchanging health information in Illinois and the State's roles and responsibilities related to such efforts, includes the creation of the Health Information Exchange Authority (the Authority). The Authority is responsible for establishing and operating the Illinois HIE to promote and facilitate the sharing of health information among health care providers within Illinois and other States. The Authority is also responsible for promoting the adoption and use of electronic

health records throughout Illinois and promoting participation in the Illinois HIE. An inter-agency governance structure, operating procedures, and responsibilities of the Authority are specified in the Act and intended to enable the Illinois HIE and other health information technology initiatives in Illinois. Again, while the Unified System's scope of information may not overlap with what is included in the HIE, because the HIE will work through similar issues as the Unified System, including inter-agency cross sector collaboration and the use of sensitive data, there is opportunity for the Unified System to look to the operations and proceedings of the Authority as a model.

- **Other Public Acts to Consider**

As the Unified System is developed and implemented, additional Public Acts and legislation to be mindful of as information privacy and security are considered include:

- The **Illinois School Student Record Act (Public Act 79-1108)** details specifications for ensuring the privacy and security of student records. Specifically, it authorizes ISBE to uphold the privacy and security of student records within the context of rules and regulations established by schools to maintain, access, and disseminate student records.
- The **Illinois Personal Information Protection Act (Public Act 94-36)** defines the need for businesses or agencies to notify individuals if there is a breach in security resulting in their personal information being released to unauthorized individuals.
- The **Mental Health and Developmental Disabilities Confidentiality Act (Public Act 80-1508)** outlines methods for handling mental health information and records and defines confidential communications, provides directions for access to and disclosure of mental health information, creates privileges, and provides for civil and criminal penalties for breach of its provisions.
- The **Department of Human Services Act (Public Act 97-0558)**, which was enacted to establish a Management Improvement Initiative Committee for the purpose of easing the burden of reporting by service providers. The Committee is looking at how data is currently collected from providers and how it can be simplified and streamlined for easier sharing amongst the five social service agencies. The goal is to clear the pathways of how they share data while respecting anonymity of the people they serve.

J. Landscape Summary

The following table provides an at-a-glance summary of the Illinois organizations that were reviewed in this section of the report. The table briefly describes their relevant capabilities in the governance categories identified at the start of this report namely - leadership, organizational capacity, data governance, communication and collaboration, information technology and financial management.

At-a-Glance Landscape Summary – Unified System Support Capacity						
Agency/Organization/Project	Leadership	Organizational Capacity	Data Governance	Communication & Collaboration	Information Technology	Financial Management
Illinois State Board of Education	Data Governance Committee; ILDS Governance Model	Office of Information Technology; contracted 3 rd party vendors	Data Governance Committee; ILDS Data Advisory Committee; ILDS Data Sharing Framework	Data Governance Program	Student Information System; Illinois Longitudinal Data System Data Warehouse	Budget and Financial Management Division
The Framework Project	Framework Executive Steering Committee; Planning Governance Board	State Project Management Office and contracted 3 rd party vendors	No formal governance structure identified.	Advisory Council; Stakeholder engagement process	Integrated Eligibility System, Medicaid Management Information System; Health Benefits Exchange	Framework Executive Steering Committee

At-a-Glance Landscape Summary – Unified System Support Capacity

Agency/Organization/Project	Leadership	Organizational Capacity	Data Governance	Communication & Collaboration	Information Technology	Financial Management
Illinois Health Information Exchange	The Illinois Health Information Exchange Authority (“The Authority”)	Office of Health Information Technology (Governor’s Office); Regional Extension Centers; contracted 3 rd party vendors	ILHIE Data Security and Privacy Committee	Illinois Health IT Regional Extension Center (IL-HITREC); Chicago Health IT Regional Extension Center (CHITREC); Consumer and Patient Education Workgroup	Illinois Health Information Exchange	Director of OHIT/State Health IT Coordinator; OHIT Chief Financial Officer
Illinois Department of Children and Family Services	DCFS Director; Division of Finance, Technology, and Planning	Regional Supervisors; Child Care Resource & Referral Agencies	Office of Information Technology Services	Office of Communications	Over 120 systems ranging from Legacy systems to systems using current Microsoft operating systems and software	Division of Finance, Technology, and Planning
Office of Early Childhood Development- Illinois Early Learning Council	Early Learning Council Executive	Various subcommittees that address early learning	Data, research and evaluation committee	Family and community engagement committee; Joint	None	System integration and alignment committee

At-a-Glance Landscape Summary – Unified System Support Capacity

Agency/Organization/Project	Leadership	Organizational Capacity	Data Governance	Communication & Collaboration	Information Technology	Financial Management
	Committee	focus areas.		Education Leadership Committee		
Head Start	Illinois Head Start Association	Illinois Head Start Association	Illinois Head Start Data Cooperative	Illinois Head Start Association & Illinois Head Start Collaboration Office	ChildPlus, COPA and other program management systems.	Managed by individual Head Start grantee agencies
Illinois P-20 Council	Joint Education Leadership Committee	Various committees that implement council directives.	Data Assessment and Accountability Committee	Family, Youth and Community Engagement Committee	None	Finance and Governance Committee
Illinois Early Learning Asset Map	Technical Advisory Committee	University of Illinois National Center for Supercomputing Applications	Technical Advisory Committee	Online surveys and direct stakeholder engagement; IECAM web site.	IECAM software application providing data collection, data aggregation and reporting capabilities.	None

III. RTTT Early Learning Challenge Review

The Race to the Top - Early Learning Challenge (RTT-ELC) is a funding opportunity extended to states by the US Department of Education in partnership with the Department of Health and Human Services. This joint initiative seeks to provide an incentive for states to strengthen their early childhood systems through such quality improvements as comprehensive data systems, enhanced professional development, and family engagement. The Early Learning Challenge tasks states with engaging a diverse group of community stakeholders in an effort to enhance access to quality early learning programs for low-income and disadvantaged children, design integrated and transparent systems that align their early care and education programs, bolster training and support for the early learning workforce, create robust evaluation systems to document and share effective practices and successful programs, and help parents make informed decisions about care for their children.

A review of the RTT Early Learning Challenge Phase II application as well as relevant organizational websites was performed to document the vision set forth for governance and management of RTTT implementation activities. The Illinois Early Learning Challenge Phase II Intergovernmental Agreement was a key document used to develop the review provided below.

A. Governance Model

The RTTT governance model provides an overall framework from which the Unified System should draw and intersect. A description of each of the RTTT governance functional entities is provided below and is represented by the following organizational chart.

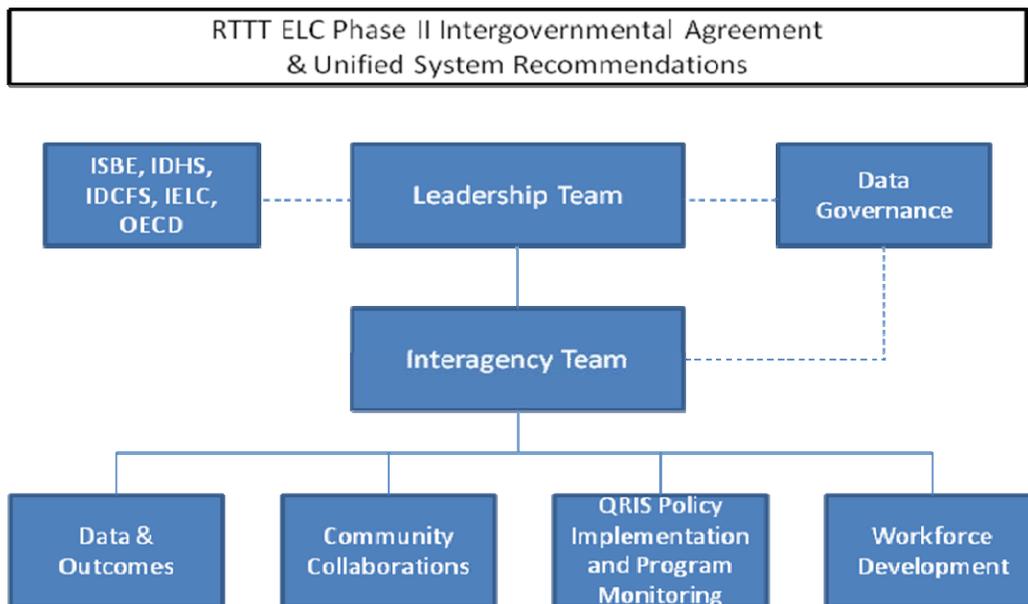


Figure 4

- **Lead and Participating Agencies:** Illinois State Board of Education (lead agency); Illinois Department of Human Services, Illinois Department of Children and Family Services, Illinois Early Learning Council, Office of Early Childhood Development (participating agencies).
- **Leadership Team:** The Leadership Team consists of the IELC Co-Chairs, the State Superintendent of Education, the Secretary of IDHS, the Director of DCFS and the OECD Director. The team will meet at least quarterly and is responsible for identifying and acting upon key policy decisions and for the oversight of all areas of the State Plan.
- **Interagency Team:** The Interagency Team will meet at least monthly and is responsible for ensuring the successful execution of the activities set forth in the State Plan and the directives of the leadership team. The Interagency Team consists of senior members of the lead agency (ISBE) and participating agencies including IDHS and IDCFS.
- **Interagency Project Teams:** Interagency Project Teams will meet at least weekly and will have membership and charges as established by the Interagency Team. The project teams will be established in each of the following areas:
 - Data and Outcomes (led by the Data and Outcomes Manager in OECD)
 - Community Collaborations (led by the Community Systems and Capacity Building Manager (supported by the MIECHV grant)
 - QRIS Implementation and Program Monitoring (led by the QRIS Policy Director)
 - Workforce Development (led by the Workforce Development Policy Director in OECD)

B. Incremental Staffing Requirements

It has been determined that additional capacity is required to carry out the State Plan including four new staff positions as described below. These positions will be established in OECD as soon as is practicable. All positions shall report to the OECD Director.

- Data and Outcomes Manager - The Manager will be assigned to OECD by ISBE, and will work with the lead and participating agencies, and their contractors to ensure the availability of data needed to monitor the State Plan's outcomes and further develop effective policy.
- QRIS Policy Director – The Director will be assigned to OECD by IDHS, and will provide strategic direction to the implementation of the TQRIS system as described in the State Plan.
- Workforce Development Policy Director – This Director will be assigned to OECD by ISBE, and will provide strategic direction to and coordination among early childhood workforce development activities funded by state agencies.
- Grant Administration and Budget Development Manager – The Manager will be assigned to OECD by ISBE, and will work with the lead and participating agencies and their

contractors to ensure compliance with and fulfillment of all requirements of the State Plan and the administering federal agencies.

C. Data Governance Structure

To oversee and administer the data sharing arrangements necessary to carry out the State Plan, the Leadership Team, the Interagency Team and OECD shall collaboratively work toward the establishment of a data governance structure that provides for (i) an efficient and appropriate review of proposed data sharing arrangements involving early learning and development data; (ii) an efficient contracting process for such data sharing arrangements; (iii) the protection of personally identifiable information on children or families participating in early learning and development programs; and (iv) coordination with other data governance systems and structures established by State agencies for education data and health and human services data.

D. RTTT Business Plan

In considering the business requirements of The Unified System, a key resource was the Illinois' Race to the Top Phase II application. The need for a Unified System is specifically referenced in the Race to the Top application through Goal (E) (2)-1.

“The collection, maintenance, and use of Early Childhood Data is coordinated and integrated across systems, including data maintained by State agencies and Head Start/Early Head Start grantees.”

The Race to the Top plan provides vision, strategy, goals and objectives for transforming the State's early childhood environment in a comprehensive manner. The project describes a multi-year, comprehensive approach to improving birth through five early learning and development systems and for building a more unified approach to supporting young children and their families. The RTTT project will address five key reform areas representing the foundation of an effective early learning and development reform agenda that is focused on school readiness and ongoing educational success. These areas include:

- Successful State Systems;
- High-Quality, Accountable Programs;
- Promoting Early Learning and Development Outcomes for Children;
- A Great Early Childhood Education Workforce; and
- Measuring Outcomes and Progress.

The RTTT plan describes the need for a **unified early childhood data system** (the Unified System) that links information across programs to improve policy and practice. The Unified System will serve as a mechanism to inform the efforts that will address these reform areas. The plan specifies the following goals and key activities:

- Goal (E)(2)-1 - The collection, maintenance, and use of Early Childhood Data is coordinated and integrated across systems, including data maintained by State agencies and Head Start/Early Head Start grantees
 - Activity (E)(2)-1.1 - Establish the legal and governance framework for the sharing of data among Participating State Agencies
 - Activity (E)(2)-1.2 - Designate and Enhance Primary Systems for Data on Children & Families, Workforce, and Programs Project Management:
 - Activity (E)(2)-1.3 - Use common data standards, building from Illinois' leadership with the State Core Model and CEDS, for all State systems collecting early childhood data
 - Activity (E)(2)-1.4 - Integrate Head Start and Early Head Start data into the Primary Systems through the establishment of the Illinois Head Start Data Cooperative
- Goal (E) (2)-2 - The Illinois early learning data system generates information that is timely, relevant, and accessible to support continuous improvement and decision making.
 - Activity (E)(2)-2.1 - Integrate Referral, Tracking, and Program Information Systems to Ensure All High Need Children Receive a Broad Array of Necessary Supports
 - Activity (E)(2)-2.2 - Extend the Illinois Shared Learning Environment to ELD Programs

Illinois understands that there are multiple concurrent, overlapping and in some cases competing projects that will impact the development of the Unified System. The Unified System Planning Project seeks to document these parallel efforts, prioritize them, integrate them and provide recommendations on how to ultimately implement the Unified System. Through the RTTT project, Illinois seeks to link information contained within IDHS and ISBE systems to inform policy and practice. RTTT specifies that services that may be developed include:

- Indexing the identifier elements needed to support matching of ISBE and IDHS data;
- Applying the WDQI matching rules, as appropriate, to IDHS data;
- Designing the web service extractions from IDHS systems needed to support matching with ISBE data; and
- Piloting and implementing matching of IDHS and ISBE data.

The elements of the RTTT plan as described above serves as the starting point for the Unified System strategy. The recommendations and findings of the Unified Systems Planning Project will complement and complete that strategy.

E. RTTT Summary

The following table provides an at-a-glance summary of the Illinois Race to the Top plan as reviewed in this section of the report. The table briefly describes their relevant capabilities in the governance categories identified at the start of this report namely - leadership, organizational capacity, data governance, communication and collaboration, information technology and financial management.

At-a-Glance Landscape Summary – RTTT Unified System Support Capacity						
Agency/Organization/Project	Leadership	Organizational Capacity	Data Governance	Communication & Collaboration	Information Technology	Financial Management
Race to the Top Early Learning Challenge	Lead (ISBE) and Participating (IDCFS, IDHS, IELC, OECD) Agencies; Leadership Team	Interagency Team; Interagency Project Teams; Incremental OECD Staffing; RTTT business plan	Data Governance Structure	Family and community engagement committee; Joint Education Leadership Committee	None	Grant Administration and Budget Development Manager

IV. Risk Analysis

Although a variety of programs and services are provided to the early childhood population throughout Illinois, they are often administered independently of each other and are not well coordinated. As a result, data and information on children's early care and education experiences are siloed and uncoordinated making it difficult for policymakers to answer basic questions and target resources. The Race to the Top Early Learning Challenge grant opportunity encourages states to demonstrate their commitment to integrating and aligning resources and policies across state agencies and organizations that administer public funds related to early learning and development, including an optional component to build or enhance early learning data systems. With RTTT funding, Illinois has prioritized developing an integrated data system that will make data accessible to a variety of stakeholders across early childhood-related organizations and programs. In doing so, Illinois faces the daunting challenge of integrating multiple disparate early childhood information systems across program and agency silos with competing priorities and perspectives via the Unified System.

The Unified System will bring together select early childhood-related data collected across State agencies, departments, and programs and their respective information systems in an integrated systems environment. There are a number of complex legal, administrative, technical, and political issues and potential risks to be considered and addressed to ensure the success of the Unified System in accomplishing its goal.

Integrating information systems in the education setting and specifically in the early childhood setting remains a relatively new endeavor. Thus, standard models and best practices are in the formative stages at best. Looking to other sectors, such as health care and finance where integrating and exchanging information is more common with established systems and standards, can help to inform the planning and development of the Unified System particularly within the context of risk management.

Risk management is the process of identifying risk, assessing risk, and taking steps to reduce or eliminate risk through mitigation efforts. In this section of the report, we identify and describe potential risks that may impose barriers to or threaten the success of the Unified System. The identified risks are based on the early childhood systems and governance landscape in Illinois and JSI's experience in integrating information systems. A mitigation approach is offered for each identified risk with a more comprehensive strategy and more detailed guidance in the Key Findings and Recommendations section that follows. As with the prior sections of the report, the framework of leadership, organizational capacity, data governance, communication and collaboration, information technology and financial management are used to organize the review.

A. Legal

Integrating data across systems poses legal concerns relating to the privacy of the people whose personal information is stored within these systems as well as the protection of that data through security-based measures. The right to access and use data to inform policy, practice, and research is regulated by federal law, state law, and other public policies.

HIPAA and FERPA: At the federal level there are two main legislative enactments that provide guidelines for the protection of health-related information and educational information — the

Health Insurance Portability and Accountability Act (HIPAA) and the Family Educational Rights and Privacy Act (FERPA).

Currently in Illinois, individual agencies are responsible for interpreting and applying HIPAA and FERPA as it relates to the agencies’ work. Therefore, the interpretation and application of HIPAA and FERPA regarding data access, use, and sharing varies to some extent by agency and organization because individual agencies and programs operate and use data in a siloed fashion. With regard to the Unified System, because data will be integrated, accessed, and used across agencies and programs, there is a risk of individual agencies and organizations having contrasting interpretations of what these laws mean and how to best apply them.

Agency Specific Policies: Beyond HIPAA and FERPA, states are required to protect the privacy of children and families served by public service agencies, such as child welfare, housing and homelessness, and juvenile justice. In these areas, state and local governments are responsible for the development, documentation, and implementation of privacy protections within their administrative data systems.

Other State Legislative Acts: Beyond data related concerns, Illinois has enacted legislation in a number of areas with the intention of formalizing governance structures, setting policy and business strategy, and providing legislative mandates as required to improve the State’s educational and healthcare system in a number of areas. It is important to understand how existing legislative guidance supports or possibly restricts the goals of the Unified System. By reviewing relevant State legislative acts within the context of the Unified System Planning Project, these issues can be identified and addressed.

Legal Risks	Mitigation Strategies
Varying interpretations of HIPAA and/or FERPA, other state statutes as well as agency specific privacy/security policies results in inconsistent approaches to data sharing policies and practices.	Develop explicit and consistent interpretations of relevant laws/policies and how they support/restrict the Unified System strategy; collaborate closely with participating agencies; ensure staff are qualified and representative of participating agencies (Data Governance).
The ongoing risk associated with evolving state, local, agency, or organization laws/mandates that might restrict data exchange within the Unified System.	Ensure that a sustained process is established for identifying, reviewing, and addressing any evolving legal and policy issues associated with privacy, security, and data sharing that may influence data access and use in the Unified System (Data Governance).
Existing legislation may restrict the development of the Unified System or associated governance/management structures. Issues may include lack of clarity or conflicts related to responsible parties, privacy and security concerns, funding and competing projects.	Review existing legislation within the context of Unified System plans and develop recommendations for corrective action as required (Leadership).

B. Administrative

The Unified System will require significant leadership, management, human and financial resources to ensure successful development, implementation, and sustained operation. Considering the inter-agency nature of the Unified System, there are several potential risks related to leadership, management, and accountability.

Administrative and Management Resources: There is some benefit to leveraging existing capacity and resources by embedding and integrating the leadership and management structure and functions of the Unified System within existing organizational structures and functions, however there is a risk that existing organizational structures and resources are not prepared to accept these responsibilities.

Competing and/or Conflicting Administrative Structures: Multiple existing and planned governance and administrative structures have been identified in this review. While well intentioned, it is very likely that organizational capacity, policy, best practices, technical guidance and possibly even legislative acts may be developed that provide conflicting guidance, don't address all the needs that need to be met, or introduce inefficiencies into the broader collaborative model.

Shared and Sustained Commitment: Considering the inter-agency/organization partners who will be participating in the Unified System and the need for sustained collaboration, there is potential risk of partners losing enthusiasm, buy-in, and momentum, all of which could hinder the evolution of the Unified System. To mitigate this risk there is need for sound and sustained leadership, project management and communications.

Technical and Operational Resources: As the Unified System is developed and rolled-out, technical and human resources will be required to deliver and operate the system. Potential risks include an inadequate workforce considering the significant layoffs and early retirements that are occurring throughout State agencies. With these layoffs and early retirements, there will be a loss of experience and institutional memory (and relationships) that may limit the workforce's ability to fully execute and utilize the Unified System to its intended capacity. Furthermore, the architecture of the system requires the use of advanced system design, software development and technology infrastructure capabilities.

Interagency Communications: Sustained communication with collaborating agencies/organizations is critical to successfully maintaining support and participation in the Unified System. Currently, there is limited capacity in this area with no clear mechanism or process in place to ensure all collaborators and stakeholders are kept abreast of the planning, development, and implementation of the Unified System. Lack of communication may also result in misinformed collaborators, misunderstood roles and responsibilities, and misaligned goals for the system. There is a need for a clearly defined communication structure and process for regular communication of progress and system updates.

Funding: Development, implementation, and sustained operation of the Unified System will all require significant funding. Currently, as this system is being planned, development and implementation will be grant funded via RTTT dollars. There is a risk for inadequate funding to sustain the operations of the system over the long-term when RTTT dollars are no longer

available. There is a need to develop a financial sustainability plan identifying who and how the system will be funded.

Administrative Risks	Mitigation Strategies
<p>Overlaying new governance and administrative requirements onto existing capabilities may result in an overly complex structure and also impose burdens on existing staff that will limit the effectiveness of this approach. Also, this approach may result in redundant and fragmented capacity.</p>	<p>Develop a clearly defined governance structure to effectively lead and manage the Unified System that leverages existing capacity when possible but brings in new, highly qualified resources as appropriate (Organizational Capacity).</p>
<p>While it is critical for leadership, management, and decision-making to be collaborative, there is potential risk of developing governance and administrative structures that are overly complex and cumbersome in an effort to promote collaboration and representation.</p>	<p>To the extent possible, develop a single governance and administrative structure across the integrated environment which allows people to easily navigate the structure, processes, and system (Organizational Capacity).</p>
<p>Concurrent and potentially conflicting efforts are currently underway to develop governance and other administrative structures.</p>	<p>Collaborate with other parties such as ILDS, Framework, ILHIE and RTTT governance efforts to align priorities and efforts. (Leadership).</p>
<p>The Unified System is a highly complex undertaking from collaborative, technical and organizational perspectives. There is significant risk associated with sustaining the required focus and commitment across participating organizations.</p>	<p>Clearly define and implement a communication process and support mechanisms (web sites, newsletters, blogs) to keep all participating agencies, organizations, and stakeholders informed on the development and implementation of the Unified System, including decisions, policies/guidelines, roles and responsibilities, project goals, project plans and timelines, etc. (Communications and Collaboration).</p>
<p>Lack of sustained communication may result in misaligned views, expectations, and goals for the Unified System, including misperceived roles and responsibilities, and limited support and participation in the System.</p>	
<p>Staffing issues associated with using existing staff, hiring incremental staff or using outsources 3rd parties for system development, implementation and ongoing operations are complex and will vary depending on the capabilities the system and when it is rolled out.</p>	<p>As plans for delivering the Unified System are formalized, develop a clearly defined plan for developing organizational capacity in all areas including planning, system development, implementation and ongoing operations (Organizational Capacity).</p>

Administrative Risks	Mitigation Strategies
<p>An inadequate and/or poorly qualified workforce to support development, implementation and operation of the Unified System throughout participating agencies.</p>	<p>See prior page for mitigation approach</p>
<p>Misperceived ownership and/or responsibility over the system that potentially diminishes buy-in and participation from other agencies.</p>	
<p>Diminishing enthusiasm, buy-in, and momentum among participating agencies, thereby hindering the development, implementation, and future evolution of the Unified System.</p>	<p>Establish sound project management to oversee the development, implementation, and operations of the System. This will involve facilitating progress in completing project milestones; managing project costs, budgets, resources, and timeline (Organizational Capacity).</p> <p>Develop communications and collaboration mechanisms that foster sustained support and participation by collaborators (web sites, blogs, status updates, progress reports, etc.) (Communication & Collaboration).</p> <p>Ensure that requirements gathering efforts identify system requirements that provide value and benefit to users of the system. Deliver and promote these capabilities to sustain commitment (Information Technology).</p>
<p>Inadequate funding to sustain the operations of the Unified System over the long-term.</p>	<p>Coordinate funding requirements with technical and operational resources. Develop a financial sustainability plan identifying who and how the system will be funded over time (Financial Management).</p>

C. Technical

Considering the many collaborators and stakeholders of the Unified System, there will be significant diversity in the type and scope of system use. There is potential risk that the system will not be developed to adequately meet the needs of all potential users and/or adequately safeguard data while also serving user needs. Furthermore, the early childhood environment in Illinois is supported by data systems that have been developed and operate in isolation relative to

the other systems that support early childhood programs. The systems vary in their technology and ability to support the Unified System with data exchange capabilities (e.g., legacy systems with limited ability to integrate). Therein lies risk that may result in limited participation in the Unified System by key early childhood related programs and information systems. Specific technical considerations include:

Poor Data Quality and Non-standardized Data: Currently agencies, organizations, and programs use individual data dictionaries to define the data collected for their individual systems. Further complicating this topic is the consistency or lack thereof regarding how data is collected. These issues pose a challenge when integrating and exchanging data via the Unified System—data standards vary from system to system as does data quality. The IELC has made a commitment to the Common Education Data Standards (CEDS) that serve as the benchmark for data sharing and interoperability. CEDS provide a common set of standards and specifications for data content and quality necessary to support an integrated systems environment as envisioned by IELC. While these standards serve as a good benchmark for review and analysis of existing data, significant efforts will be required to normalize disparate data and put mechanisms in place to improve data quality over the long term.

Lack of Unique Identifiers: The ability to consistently identify individuals (children, families and the early childhood workforce) across multiple early childhood programs and systems is an important consideration for ensuring the availability, accuracy and completeness of information within an integrated systems environment. This issue has been raised and to varying degrees addressed by agencies offering early childhood services across the State. The Illinois State Board of Education uses the Statewide Identifier (SID) to uniquely identify students in the Student Information System (SIS). A project currently under development, the Common Identifier Project (CIP), seeks to define and implement a statewide workforce unique identifier. The Department of Healthcare and Family Services (HFS) and the Department of Human Services (DHS) have implemented the Recipient Identification Number (RIN) as their standard unique identifier for Medicaid eligible residents as well as residents that utilize DHS social services respectively.

Developing Integration Standards and Legacy System Capabilities: Lack of widely accepted systems integration standards as well as the limited capabilities of legacy information systems impose significant burdens on integration efforts. Legacy systems have been in place for up to 30 years in some instances and have limited or no capacity for integration using today's technologies. Further complicating the issue is that integration standards and best practices are in the very early stages of development and acceptance in the education domain. This limitation limits the capacity of even newer systems to effectively share data in an integrated environment. The burden imposed on the Unified System project will be to understand developing standards and employ them while simultaneously offering a flexible approach to integration that will be acceptable to agencies that employ critical legacy systems.

Conflicting and Concurrent Strategies and Priorities: There are multiple concurrent projects underway in the various state agencies that are related to the Unified System. Examples include legacy systems that are being replaced; new systems that are being delivered; plans for improving the use of unique identifiers; adoption of new and evolving data and technology standards; and efforts to improve data sharing with new technologies. There are also governance

committees that exist today or are being planned that will be responsible for review, adoption and promotion of technology standards as well as the formation of technology strategy and ultimately, the delivery of technology-based systems that will support data sharing. If these efforts are not aligned, the resulting systems will be poorly integrated at best and at worst, may be incapable of data sharing.

Data Ownership and Availability: In an integrated systems environment, sensitivities associated with data ownership are a key concern. Owners of data are often times concerned about transferring their data to a neutral or 3rd party facility where they may perceive that they are losing control over their data. Further complicating this issue, are concerns associated with data being as up-to-date as possible. If data is uploaded to a central facility, concerns may arise relative to whether the data can be kept up-to-date if the data changes with any frequency at the originating facility. These challenges are typically addressed by a “federated” system architecture where data owners keep control over their data and the central system retrieves the data as required to serve its intended purpose from data analysis and reporting perspectives. Finally, early childhood records within agency systems do not represent all children across the State which may limit certain types of data analysis. Potential sources for larger, more complete and representative sets of early childhood records may come from ILHIE (in several years) or State vital records systems.

Privacy and Security: While there are legal, administrative and political issues associated with privacy and security, there are also technical concerns that must be addressed relative to this topic. The Unified System must include architectural components and the corresponding system design and operational capabilities to ensure privacy and security requirements are fully met. Without these assurances, the participating agencies and their willingness to share data will come into question. Privacy and security related features include role-based authentication and access privileges to restrict access to data, audit and control procedures to ensure adequate oversight and accountability, a secure network and database architecture to protect data, and a secure data center to provide adequate physical security of the system and associated data.

Evolving Capacity and Business Needs: A recurring theme from stakeholders has been the need for the Unified System to demonstrate real value. The expectation is that if the system reduces data sharing burden, provides tools to help improve monitoring and oversight, and improves the quality and efficiency of supported programs in demonstrable ways, the Unified System and the overall effort for delivering that system will be better received and supported. This is no small challenge and must be considered from the earliest planning stages of the system to post implementation support. It is highly likely that the system will be delivered in phases over the course of several years. How these phases are defined and prioritized are critical considerations.

Technical Risks	Mitigation Strategies
<p>Non-compliance to data standards as well as poor data quality will limit data sharing and the ability to analyze/report data from multiple systems.</p>	<p>Formalize a Data Standards and Oversight committee to formalize standards and offer participating agencies training, guidelines, and other resources to promote compliance with standards (CEDDS), data quality and data exchange capabilities within their individual data systems (Organizational Capacity).</p> <p>Establish data exchange capacity at the earliest opportunity and provide tools to agencies that will help them evaluate and improve existing data.</p>
<p>Inconsistent use of unique identifiers and limited capacity to use other approaches to identity resolution reduce capacity to track children across programs.</p>	<p>Develop robust master client index and identity resolution capabilities within the Unified System including the use of demographic and identifying data elements (CEDDS) as well as multiple unique identifiers from participating agency systems including SID, RIN, CIP and others. (Information Technology).</p> <p>Develop an overarching strategy for the creation and use of a single unique identifier that is acceptable to all participating agencies (Leadership). A Statewide approach may be impractical so strategies may be developed within individual agencies such as ISBE (SID) and DHS (RIN). This approach would use a single unique identifier within each agency’s systems, thereby reducing the number of unique identifiers on a State level.</p> <p>Develop projects to improve the consistent use of unique identifiers within participating systems that is aligned with the broader strategy for unique identifiers (Information Technology).</p>
<p>Technology-based limitations in capacity for interoperability and data exchange of existing data systems used by agencies and organizations participating in the Unified System.</p>	<p>Implement a data exchange capability including federated and centralized (hybrid) models with flexible messaging and data translation capabilities as well as transaction-based and batch file data exchange that provide flexible integration capabilities that will accommodate legacy systems (Information Technology).</p>

Technical Risks	Mitigation Strategies
	<p>Formalize technical guidance and requirements associated with data exchange and interoperability. Provide technical resources to participating agencies to assist with integration efforts (Organizational Capacity).</p> <p>As legacy systems are retired, ensure that replacement systems are compliant with the interoperability requirements of the State (Information Technology).</p>
<p>Multiple concurrent technology oversight, planning and implementation projects will strain available resources, possibly impose conflicting strategies/standards, and will potentially limit the overall success of data sharing related information technology projects.</p>	<p>A governance related information technology committee or advisory group must be formed with the participating agencies and to the extent practical, the involvement of more distant information technology groups such as ILHIE and others that don't fall under the formal governance structure. This group will be responsible for monitoring and influencing the state-wide efforts associated with interoperability and data sharing (Organizational Capacity).</p>
<p>An integrated systems environment supporting data sharing raises concerns by participants regarding data ownership, data accessibility and the availability of time-sensitive data.</p> <p>An integrated systems environment also raises concerns about the privacy and security of client data. Federal and state statutes impose restrictions and liabilities that necessitate robust privacy and security related policies, procedures and systems capabilities.</p>	<p>The governance organization must have a standing committee that addresses data access and use as well as ensuring privacy and security concerns are addressed (Organizational Capacity).</p> <p>The technology architecture will support a federated model of data exchange whereby sensitive data will be maintained by the originating agency. Participating agencies will access the data via a record locator service from the Unified System. The federated model enables the originating agency to update their data as frequently as is required to provide the most up-to-date data to the network. The Unified System will also have defined organizational relationships, role-based hierarchies, and access privileges to control and manage data access (Information Technology).</p>

Technical Risks	Mitigation Strategies
<p>Participating agencies have varying expectations about the capabilities of the Unified System and how it will provide value to them and their organizations. The system must have the flexibility to evolve over time and provide additional capabilities as they are identified.</p> <p>The system will be a costly and complex undertaking. It is not unlikely that the system will be fully developed and delivered as part of a single systems development engagement. The system must be flexible enough to be implemented in a modular fashion where higher priority functionality can be delivered sooner while other features and functionality can be implemented at a future time.</p>	<p>The Unified System architecture and technology infrastructure will be designed and implemented in a modular fashion using service oriented architecture and discreet components that support growth and enhancement as client needs evolve and as existing technology-based tools mature and new tools become available (Information Technology).</p>

D. Political

Participation in the Unified System will require significant commitment, effort, and resources from collaborating agencies and organizations. Potential political risks to anticipate and mitigate include:

Expected System Capabilities: The Unified System initiative is still in the planning phase and therefore, the features and capabilities of the system have yet to be finalized. At this time, stakeholders have misaligned understanding and expectations of what the system may offer.

System Value and Priorities: It is expected that agencies, organizations, and their programs and staff will have competing priorities and varying perceptions on the value of the System. These concerns may limit the resources and time they are willing to invest in the Unified System. Some agencies and organizations will find the Unified System to be more valuable and relevant to their work versus others. For example, not all agencies or programs are concerned about addressing statewide policy questions. Instead, some participating programs, agencies, and organizations will be seeking micro-level value from the system.

Privacy and Security Concerns: Participating agencies and organizations collect and manage sensitive child and family data. There will be varying and more than likely conflicting levels of concern among participating agencies regarding how data will be used, who will have access to the data, and how it may be presented or interpreted.

Maintaining Autonomy: As recommendations, or in some cases mandates, are made to enable the Unified System, there may be disagreement or concern with having an external entity (i.e., the Unified System and it’s governance structure) making decisions that impact how business is conducted within participating agencies as it relates to data management.

Political Risks	Mitigation Strategies
<p>Misaligned expectations, priorities, and perspectives of the Unified may hinder buy-in, support, and participation.</p>	<p>Sustained communication efforts to keep participating agencies, organizations, and programs up-to-date and well-informed on the development, implementation, and ongoing evolution of the Unified System, including plans, features, and capabilities of the system (Communication and Collaboration).</p> <p>Strong leadership that promotes the value of the system to the early childhood environment in Illinois to incentivize participation and change in business practices (Leadership).</p> <p>Ensure that requirements gathering efforts identify system requirements that provide value and benefit to users of the system. Deliver and promote these capabilities to sustain commitment (Information Technology).</p>
<p>Perceived risks associated with data sharing, privacy, and security.</p>	<p>Communicate to participating agencies and stakeholders the features to be developed in the Unified System to safeguard privacy and security of data in a flexible manner to accommodate individual participating agency concerns and needs (e.g., user-based roles and access levels). Furthermore, work with individual participating agencies to tailor the access and use of their data in the Unified System (Communication & Collaboration; Data Governance; Information Technology).</p>
<p>Participating agencies’ and organizations’ desire to maintain autonomy over their data, systems, and business practices.</p>	<p>Establishing a clearly defined collaborative process for decision-making and incentivizing recommended changes in business practices to enable the Unified System and promote data quality. For example, by building support around the intrinsic value of the System to improve the early childhood learning and development environment in Illinois (Communication & Collaboration; Leadership).</p>

V. Key Findings and Recommendations

This section of the report reviews the necessary organizational structure, leadership, organizational capacity, data governance, communication and collaboration, information technology and financial management requirements necessary to implement and support the Unified System. These requirements have been developed using JSI experience in similar integrated systems environments, best practices developed over many years within the healthcare environment, review of the existing and planned capabilities of the participating agencies across the State, and the information gathered from key stakeholders through interview and focus group discussions.

A. Organizational Structure

The figure below depicts the recommended governance structure. The elements in blue represent the organizational structure defined in the Race to the Top business plan. The elements in green represent recommended enhancements to the model that will support the Unified System strategy. Specific recommendations include:

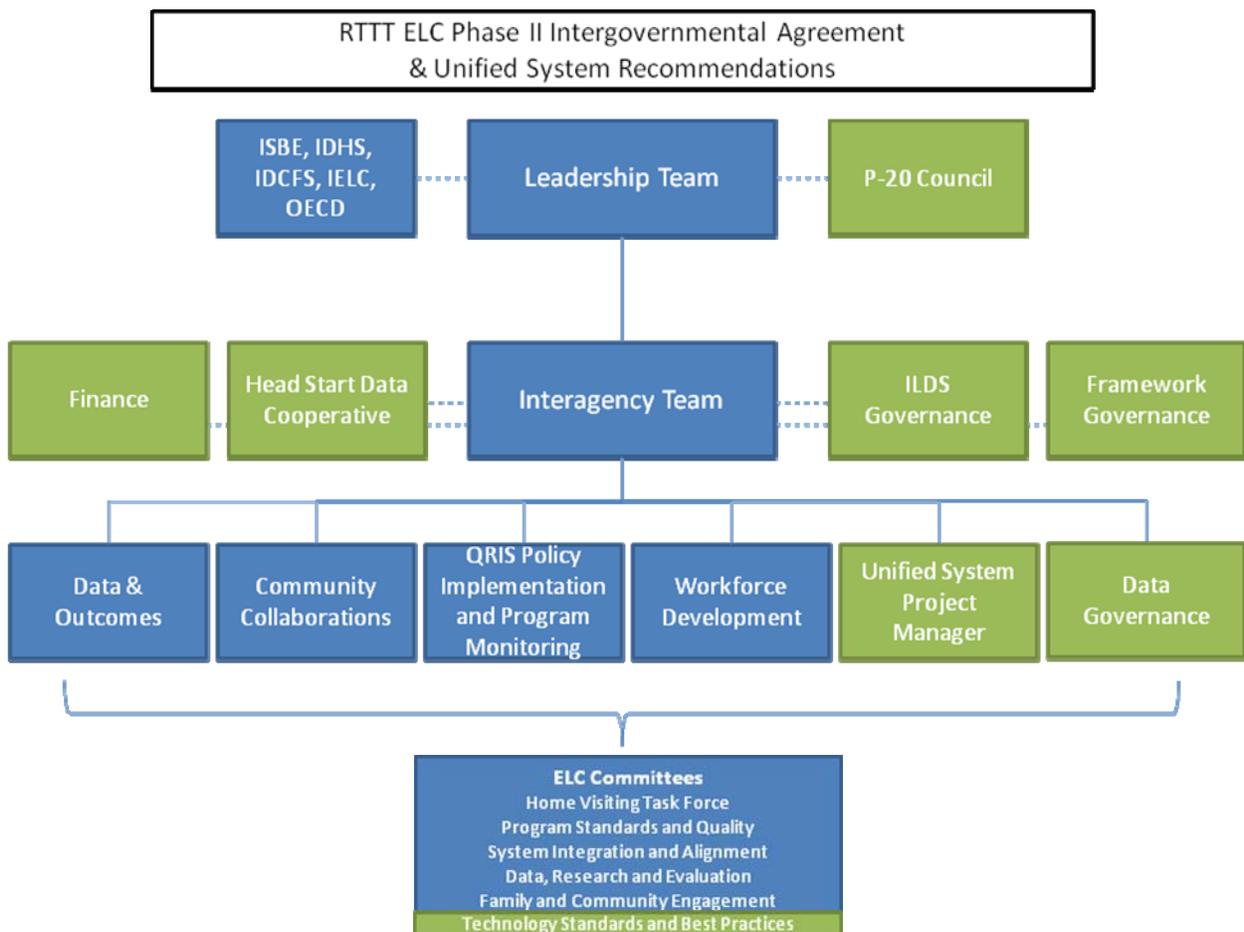


Figure 5

- Review and possibly enhance collaboration with the P-20 Council at the Leadership Team level. While the relationship between the Leadership Team and the P-20 Council already exists, the leadership capabilities of the P-20 Council cannot be overstated. This relationship should be reviewed within the context of Unified System plans and any identified leadership, collaborative and resource opportunities should be considered. Furthermore, standing committees of the P-20 Council may provide organizational capacity and technical expertise in other areas. Specific mechanisms need to be put in place to ensure that each organization (P-20 and Leadership Team) understand, reach agreement on and represent the plans of the other party.
- Formalize the collaboration model with the evolving **ILDS Governance and Framework Governance** bodies. The governance structures of these organizations are evolving very quickly. As with the P-20 Council, these relationships should be reviewed within the context of Unified System plans and any identified leadership, collaborative and resource opportunities should be considered. While these groups will provide leadership capabilities, they also represent organizational capacity, information technology capacity, data governance, and most importantly, access to early childhood data through the ILDS Data Warehouse and IES systems.
- Formalize collaboration with the evolving **Head Start Data Collaborative**. This group represents the closely aligned Head Start grantees. Head Start has functioned in a highly autonomous fashion relative to early childhood agencies and programs; the Head Start Data Collaborative may offer a streamlined mechanism for interacting with and collaborating with the Head Start grantees. Questions exist as to the need for and requirements of the Unified System. By closely aligning expectations and plans with this group, the Unified System will ensure that the children receiving services under Head Start/Early Head Start will be represented.
- Consider formalizing a **Finance Committee** to support the complex and ongoing financial requirements of the Unified System. Depending on the scope and timing, the Unified System will possibly require funding from multiple sources and multiple agencies. This will require an aggressive approach to obtaining the required funding and also, managing the overall financial resources for the project.
- Hire a full time resource for **Unified System Project Manager**. This resource must have senior level capabilities across technology, project management, early childhood and communications skill sets. Given the rapidly evolving nature of the project and the extensive need for collaboration and cooperation, this position must be filled at the earliest opportunity.
- Establish a **Data Governance Committee** and formalize data governance requirements and capabilities involving all participating agencies. This requirement has been defined in RTTT but is still in its formative stage. The group must be representative of all participating agencies and must formalize the extent to which data will be shared before the Unified System enters development. Close attention should be paid to the data governance efforts of ILDS, P-20, ILHIE and Framework (DHS). These groups must carefully consider the extent to which their efforts may be redundant or worse, conflict

with the efforts of others. Ultimately, the best model may be a single State-wide Data Governance entity that represents all participating organizations.

- Formalize a **Technology Standards and Best Practices Committee** and formalize the technology-based strategy that will drive the development of the Unified System. Integrated systems environments are in the earliest stages of development in the P-20 domain. Standards in many areas have been defined but are not widely implemented. It is critical that best practices and established capabilities are understood from an industry perspective and just as importantly, that the existing capabilities and future plans of the participating state agencies are considered.
- Assign a committee (e.g., the ELC Data, Research, and Evaluation Committee) explicit responsibility for providing strategy and guidelines to promote data quality among individual participating agencies and their systems. It will also be important to consider and implement approaches for ongoing quality improvement of source systems' data collection and management practices to support continuous quality improvement of the data that will be part of the Unified System.

B. Organizational Transformation

Beyond the organizational changes recommended above, there are a more transformative set of recommendations that must be considered. The RTTT project, the Unified System project and others such as ILDS Data Warehouse, DHS' Integrated Eligibility System (IES) and the Illinois Health Information Exchange (ILHIE) will impact all agencies, programs and their staffs in significant ways from how services are delivered, to how programs are managed, to the training and qualifications of staffs that utilize these systems. These projects will change the way education and healthcare agencies do business on many levels. These changes will require improvements and added capacity in the following areas:

- **Leadership:** To ensure commitment from participating agencies and their resources, sustained and well qualified leadership that provides strategic direction, effective oversight, and facilitates motivation and partnerships across all participating agencies and organizations is required. A model of oversight that maintains efficiency and agility and is representative of all participating agencies is required. Currently, several governance structures exist or are being developed for inter-agency system initiatives. Leadership across these parallel initiatives must be integrated or at least synchronized to the extent possible to ensure that the projects are aligned and not conflicting. The governance and organizational structure proposed in figure 5 offers one model to consider in which the RTT Governance Structure (Leadership and Interagency Teams) works collaboratively with the P-20 Council, ILDS Governance and the Head Start Collaborative to lead, manage, and oversee shared strategies, goals and objectives. Key recommendations for Leadership include:
 - Establish sustained, collaborative, and efficient leadership across all participating agencies.
 - Engage State government and other influential groups as required to promote the Unified System.

- Identify and eliminate gaps and redundancies across the existing and planned governance entities.
 - Define, staff and support the required organizational structure from governance, planning, systems development and operational perspectives.
 - Pursue funding from all available sources as necessary to promote the development and sustainability of the system.
 - Promote the value of the Unified System to the early childhood environment throughout Illinois.
- **Organizational Capacity:** To be successful, the Unified System will require clear and strong strategy, knowledgeable and effective project management, well defined and supported operations and business practices, and capable and qualified human resources. The governance structure proposed above addresses part of this requirement, but capacity must also be developed within participating agencies. Currently, there are no specific plans for how participating agency responsibilities associated with the Unified System will be addressed. Who will enhance existing systems so that they can integrate with the Unified System? Who will be responsible for ongoing data exchange operations? Who will provide the necessary training to agency resources? How will the Unified System be designed, built and operated? Current expectations are that these requirements will be met by 3rd party vendors with the required experience and expertise in the areas in question. In some cases, established committees will fulfill these obligations. Key recommendations for Organizational Capacity include:
 - Develop a position and recruit for a Unified System Project Manager.
 - Develop a clearly defined plan for developing organizational capacity in all areas including planning, system development, implementation and ongoing operations.
 - Leverage existing resources where practical such as established committees.
 - Develop a technical assistance and training plan to develop the necessary skill-sets within existing resource pools.
 - Formally define resource requirements of all participating agencies and develop plans to develop or hire these resources.
 - Consider 3rd party vendors for critical and/or short term needs.
 - **Data Governance:** Privacy and security of data is one of the more sensitive challenges to be addressed in the integrated systems environment. There are multiple efforts currently underway to address these concerns. This reality is one of the more significant risks associated with these projects. Shared expectations, legislative mandates, policies and procedures must be aligned across these projects to ensure their success. An inter-agency group dedicated to defining roles, responsibilities, policies and business process for data access, data use, and data sharing is specified in the proposed organization structure. Furthermore, the need for this group to align itself with ILDS, Framework, ILHIE and Head Start governance entities is also cited. However, what has not been formally addressed is possibility of eliminating this redundancy, at least within the education domain and formalizing a single data governance group across DCFS, DHS, ISBE, and

Head Start education agencies and programs. A less formal collaborative structure would be defined for ILHIE and DHS healthcare related organizations, agencies and programs. Key recommendations for Data Governance include:

- Develop an inter-agency group dedicated to defining roles, responsibilities, policies and business process for data access, data use, and data sharing that is aligned with other governance entities forging similar initiatives yet is efficient and avoids redundancy.
- Develop explicit and consistent interpretations of relevant laws/policies and how they support/restrict the Unified System strategy.
- Ensure that a sustained process is established for identifying, reviewing, and addressing any evolving legal and policy issues associated with privacy, security, and data sharing that may influence data access and use in the Unified System.
- **Communication and Collaboration:** The Unified System is a complex undertaking from collaborative, technical and organizational perspectives. Sustained communication and collaboration is critical to maintaining support and commitment across participating organizations and stakeholders. Clearly defined communication processes and support mechanisms (meetings, presentations, focus groups, training sessions, web sites, newsletters, blogs, status updates and reports) will keep stakeholders informed and up-to-date.

Just as important as outbound communications, participating organizations will need the opportunity for a clear voice in representing their organization and its context, needs and concerns related to the features of the system, how the system will support data sharing, and how the system will help them to do their jobs better. Structured and timely engagements with participating agencies and their staff are recommended within the context of to understand how the Unified System can evolve to best meet their individual organization/ program needs and provide value to their work. Key recommendations for Communication and Collaboration include:

- Develop and implement a communication plan for sustained communication efforts to keep participating agencies, organizations, programs and staffs up-to-date and well-informed on the development, implementation, and ongoing evolution of the Unified System.
- Develop a plan for ongoing engagements with participating agencies and organizations to provide opportunity for agency/organization leadership and staff to weigh in on the development and capabilities of the Unified System, as well as to identify how the system can evolve to best meet their needs and offer value.
- Develop a communications infrastructure and support mechanisms (web sites, newsletters, blogs, status reports, meeting agendas and minutes, etc.) to keep all participating agencies, organizations, and stakeholders informed.
- **Information Technology:** Broadly conceived, the Unified System will provide a system design that is flexible and facilitates integration and interoperability, as well as providing value-added business services to the early childhood workforce, program administrators and researchers. Considering the cost and complexity of developing such a system, it is

unlikely that it will be fully developed and delivered as part of a single systems development engagement. Further complicating this topic is the lack of consistency relative to unique identifiers, data standards and technology across the participating agencies and organizations. To address these challenges, the Unified System architecture and technology infrastructure should be designed and implemented in a modular fashion with the flexibility to evolve over time and provide additional capabilities as they are identified.

The Unified System will also impose significant burdens on the IT staffs of participating organizations. How existing and planned systems of participating agencies will be integrated with the Unified System will be the responsibility of the IT staffs of participating agencies to a significant degree. These resources must have both the capacity to do the work and the necessary training to be successful. Key recommendations for Information Technology include:

- Design and implement the Unified System architecture and technology infrastructure in a modular fashion with the flexibility to evolve over time and provide additional capabilities as they are identified.
- Develop an architecture that supports both federated and centralized models of data sharing (hybrid model).
- Ensure that early stages of system development (requirements gathering) consider the specific needs of system users and how the system will provide value.
- Develop dashboard, data analysis and reporting features of the system at the earliest opportunity in order to provide value to system users.
- Develop data exchange capabilities that manage the inconsistencies of legacy system data through robust data translation and validation functions.
- Develop robust master client index and identity resolution capabilities within the Unified System that are capable of managing multiple unique identifiers, and can analyze demographic and other identifying data to support identity resolution.
- As legacy systems are retired, ensure that replacement systems are compliant with the interoperability requirements of the State.

Financial Management: Given the collaborative nature of the project and the extent to which the Unified System will provide services to multiple State agencies, financial management is a complex undertaking. The evolutionary nature of the system, in that it will more than likely evolve over many years with broadening capabilities and users, will also require extended funding from multiple sources. These requirements suggest the need for a Finance Committee to manage these issues over the life of the project. Key recommendations for Financial Management include:

- Establish a Finance Committee to manage funding of the Unified System as it is developed, implemented, and evolves over time.
- Develop a financial sustainability plan identifying who and how the system will be funded over time.