



IOWA'S STATE LONGITUDINAL DATA SYSTEM

DATA GOVERNANCE MANUAL

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PURPOSE OF THIS DOCUMENT

This document is a guide to the policies and procedures of Iowa’s State Longitudinal Data System (SLDS). It serves as the formal documentation of the structure, processes, and governance procedures of the Iowa SLDS, all of which were reviewed, discussed, and agreed upon by the Steering Committee and the Project Team. This document was last updated on June 19, 2024.

MISSION AND SCOPE OF THE SLDS

Iowa’s State Longitudinal Data System (**SLDS**) is the result of a multi-agency collaboration that brings together quality, timely longitudinal data that inform policies and practices to improve education and student outcomes in Iowa. The SLDS brings tremendous value to the state, providing unrivaled insight into the educational experiences and post-high school activities of Iowa’s students. These data are essential to state and local policymakers, parents, and the public.

The mission of the SLDS is to facilitate the sharing of data across agencies that can be used for reporting or for evaluation and analysis that leads to a greater understanding and, ultimately, improvement, through data-driven decision making, in educational outcomes at the elementary, secondary, postsecondary, and higher education levels and in workforce outcomes.

SLDS PARTNERS

The SLDS brings together data contributed by various SLDS data-contributing partners. The SLDS partners at the time of this approved governance agreement are listed below. Those that are also data-contributing partners are indicated with an asterisk (*).

- Iowa Board of Regents* (BOR)
- Iowa Department of Education (IDOE)-PK-12 Learning* (K12)
- IDOE-Community Colleges & Postsecondary Readiness* (CC)
- IDOE-College Student Aid* (Iowa College Aid)
- Iowa Workforce Development
- Iowa Area Education Agencies

Becoming an SLDS Partner

Organizations that are interested in becoming partners must first be approved as new data partners by the Steering Committee, complete the necessary agreements, and learn about the system.

Organizations that wish to join the SLDS as data-contributing partners must submit a request to a SLDS Project Team member, which will direct the request to the Steering Committee for approval.

Information about the approval process is outlined in the How are Decisions Made section of this document. Upon approval, the new data-contributing partner must complete the following steps.

1. The new data-contributing partner identifies representatives to serve on the Project Team and Steering Committee.
2. The SLDS Project Team updates all governance documents and materials to include the new data-contributing partner.
3. The Steering Committee, in conjunction with the new data-contributing partner, reviews, approves, and signs (as needed) the updated documents.
4. The new data-contributing partner signs all necessary Memorandum of Understanding (MOU) documents.
5. The new data-contributing partner works through the process of adding data to the Repository.

THE STATE LONGITUDINAL DATA SYSTEM

The **SLDS** is a “system of systems” that allows the linkage of longitudinal data from multiple participating organizations to support student growth and learning at all levels of education and into the workforce. The system allows for secure data sharing for a multitude of uses, including program evaluation, reporting, and identifying trends, gaps, and successes across the educational continuum. The system is a mechanism for data sharing between established partners to support a variety of needs. The **SLDS Project Team** and the **SLDS Steering Committee** are responsible for governing and managing the SLDS.

Each data-contributing partner collects data via their own reporting systems and stores the data in each organization. The SLDS is used to merge information from these separate data stores to create reports or address research or evaluation needs. A subset of a partner’s data is shared and combined in the SLDS to support approved projects. The SLDS securely joins data from multiple sources and permits connections between individual-level data from entity to entity and year to year. The SLDS uses unique identifiers to protect personal, confidential information. Data are de-identified prior to use in order to

ensure privacy and confidentiality are maintained. Sharing data requires a strong relationship of trust among the various **SLDS data partner** agencies. To preserve that trust, each **SLDS data-contributing partner** decides, on a project-by-project basis, whether or not their data can be used for that purpose.

Iowa's SLDS uses a governance model that combines aspects of both the federated model and the centralized model of SLDS governance. In practice, this means that while all data-contributing partner agencies maintain authority and control over their data within the system (consistent with a federated model), the SLDS also stores some frequently-used matched, merged, de-identified record-level data in a Data Repository (similar to a centralized model). This approach allows for versatility and efficiency in fulfilling data requests by storing some of the most frequently-requested data, thus eliminating the manual matching process for every data request. Each data-contributing partner maintains control over their data, and data matching and sharing can still occur as needed to fulfill requests that cannot be filled using the Data Repository. This approach allows for clear, consistent policies regarding data use by eliminating the need to repurpose a dataset created for one data request to fulfill a data request for another use.

Data Storage

Iowa's SLDS data are used to support a wide variety of internal and external initiatives, from ad hoc requests for aggregate data to long-term outcome reporting. In some cases, the SLDS data created for the request is securely sent to the requestors. In other cases, the data created for the request need to be stored in the SLDS system. Examples of the data that must be stored include those data used to power the Postsecondary Readiness Reports and the PREP dashboard reports and the data included in the SLDS Data Repository. These data assets are stored on a secure server maintained by the IDOE. See the Cybersecurity section for more information.

SLDS Data Repository

Iowa's SLDS Data Repository houses aggregate data and record-level data that are matched, merged, and de-identified. The Repository serves a number of important functions. First, it serves as the data source from which data are pulled to feed some reports, such as the PRR/PREP reports. In addition, it facilitates rapid responses to data requests and data inquiries by making high-priority, commonly-requested data readily accessible; no multi-agency data pull, matching, or anonymizing are required if the request or inquiry falls within the scope of the data stored in the Repository. Third, the Repository is a resource for the Project Team and the Steering Committee's research-related work. Reflecting our mission to facilitate data-sharing across agencies and to promote research and evaluation to encourage data-driven decision-making, this Repository represents an investment in those activities by creating a well-defined jumping-off point for deeper inquiries.

The SLDS Data Repository is governed by the SLDS Project Team and Steering Committee. Specifically, this means that any requests to use the data stored in the Repository are decided by either the Project Team or Steering Committee as detailed in the SLDS Governance section, below. In addition, the Steering Committee is responsible for maintaining the security of the Repository and ensuring its compliance with state and federal laws.

If an approved project requires long-term data storage, those data should be added to the Repository. However, data needed for approved projects do not need to be added to the Repository; data can be added on a temporary basis for the duration of the project and then removed, or can be merged, delivered to the recipient, and then destroyed. This decision should be made by the team that approves the data request. However, if a data-contributing partner wants to contribute data to the SLDS Repository, they may do so at their discretion. Similarly, if a data-contributing partner wants to remove their data from the SLDS Repository, they may also do so at their discretion.

Although no formal permission is required of the Steering Committee for an SLDS data-contributing partner to add data to the Repository, adherence to some general guidelines is necessary to preserve the security and utility of this resource. Data-contributing partners who intend to add data to the Repository should follow the steps laid out in the process document, *Adding Data to the SLDS*.

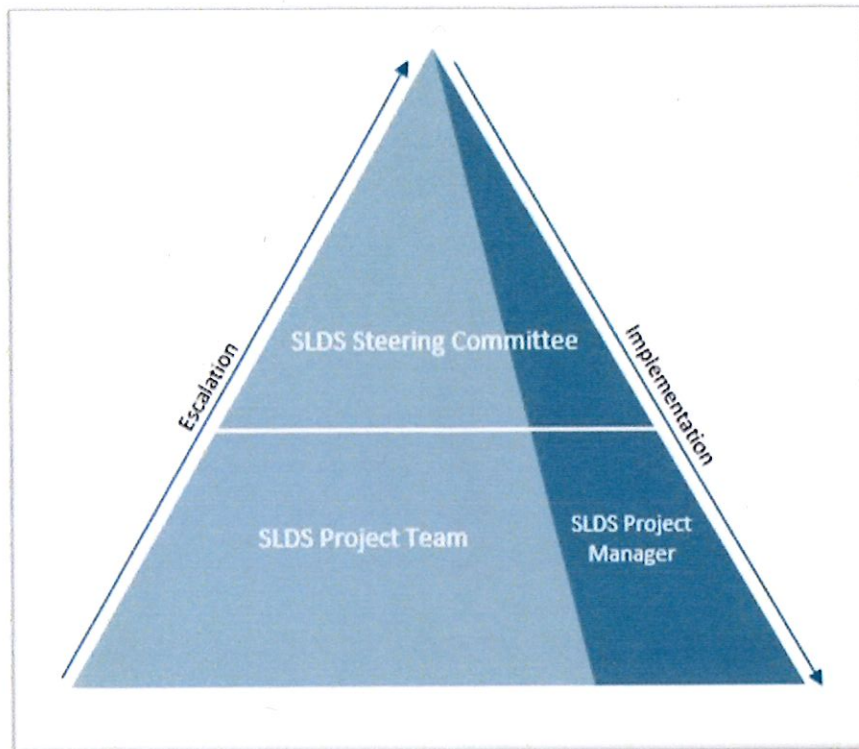
Similarly, before removing data from the SLDS Repository, the data-contributing partner should provide a minimum of 30 days' notice to the Steering Committee and Project Team and coordinate with the SLDS technical team to check for data linkages that may be broken upon removal. Determining appropriate workarounds for these broken linkages is important before removing the data.

Iowa's SLDS Data Repository is designed to be long-term storage for frequently-used data to inform research and evaluation projects. However, to mitigate risk and ensure compliance with state and federal laws, the data in the Repository will have an expiration date of 15 years. In practice, this means that the Repository will store 15 cohorts of the data used to feed the PRR/PREP reports, though other data contributions may be organized in terms of academic years or other formats, so the specifics of each contribution may vary. In general, however, the Repository should never contain more than 15 years of data for a particular population. The Steering Committee revisits this limit annually.

SLDS GOVERNANCE

Structure

The following illustrates the groups and roles that are responsible for governing Iowa's SLDS.



Iowa's SLDS is managed by the Project Team and governed by the Steering Committee. The Project Team includes, among others, representatives from each data-contributing partner and data partner, while the Steering Committee includes a voting member from each data-contributing partner as well as non-voting representatives from various stakeholder agencies such as Regent universities and Iowa community colleges.

Roles and responsibilities

The Project Team

The Project Team oversees the day-to-day operations of the planning, design, production, and implementation of the SLDS. It combines the talents and expertise of all the data-contributing partners and partner agencies to develop a project vision, plan, and accompanying foundation documents that direct the steps and processes needed to maintain and adapt the SLDS to ever-changing demands. The Project Team is responsible for responding to requests and inquiries, including forwarding to the Steering Committee as needed. In addition, the Project Team is responsible for maintaining data security and quality and communicating about potential opportunities, timelines, and data-related concerns that may impact the SLDS or the work it supports. The Project Team engages the Steering Committee on a regular basis and maintains open lines of communication with leadership at their respective agencies to ensure the SLDS continues to serve the needs of their agency.

The Project Team meets weekly and may meet more frequently on an as-needed basis.

The Steering Committee

The objective of the Steering Committee is to set the strategic direction for the SLDS. The committee oversees the long-term planning for the SLDS in addition to responding to requests for enhancements from the Project Team and approving new projects or data requests. Data requests for new projects require the direction of the leadership from each data-contributing partner, and the SLDS Project Team will call on the Steering Committee to respond to these requests. In addition, these chief decision makers are positioned to consider and resolve internal and external policy issues that go beyond the authority of the Project Team as they surface. The Steering Committee serves to ensure that the SLDS reflects the overall objectives of the organizations involved, considering the unique needs and challenges of individual programs and offices.

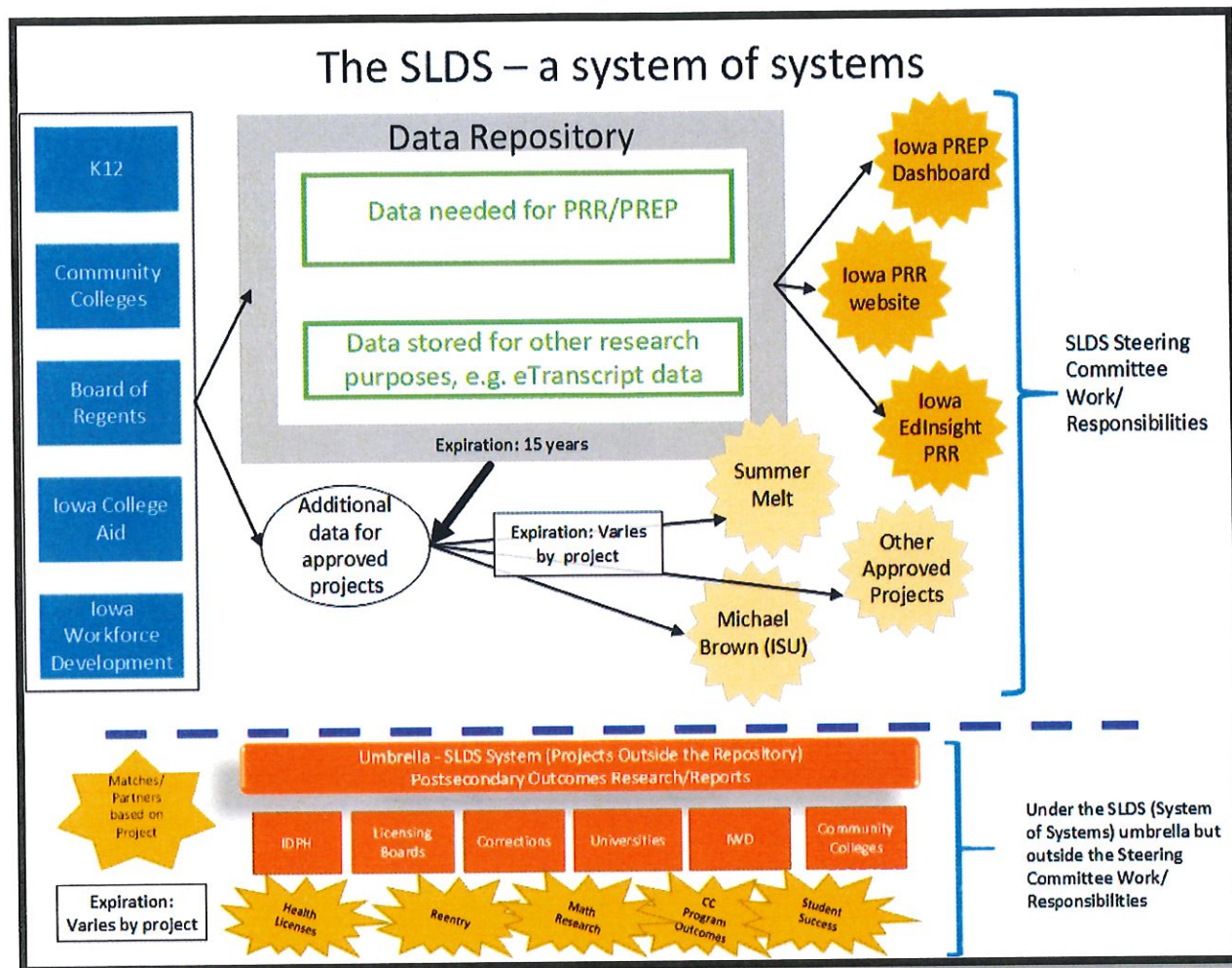
The Steering Committee convenes at regular intervals to monitor SLDS-related progress and address any issues. Quarterly meetings are held to keep partners informed and engaged in SLDS projects, including those approved by the Steering Committee and Project Team and those that fall outside the jurisdiction of these teams, but under the SLDS umbrella. Additional meetings and/or electronic approvals may be needed between regularly-scheduled Steering Committee meetings.

To ensure that the policies and procedures of the SLDS remain relevant and acceptable to all partners, the Steering Committee shall conduct a full review of all policies and procedures on an annual basis and revise all documents as necessary.

Jurisdiction

The Project Team and Steering Committee are responsible for overseeing data stored within the SLDS, both for ongoing projects and as part of the SLDS Data Repository. The Project Team and Steering Committee also have jurisdiction over any data requests that involve three or more data-contributing partners. This jurisdiction extends to the data set(s) that are created to fulfill an approved data request and/or any reports or products created from either stored data or data that were prepared specifically for a data request. Data use or data requests that involve only two data-contributing partners or do not use data from the SLDS Data Repository are not subject to oversight or approval from the SLDS Project Team or Steering Committee. Although these types of collaborations are made possible by the SLDS, the governance of the SLDS Project Team and Steering Committee does not extend to two-party data exchanges. Similarly, projects involving one or two partner agencies and other agencies also do not fall within the jurisdiction of the SLDS Project Team or Steering Committee but are included under the SLDS umbrella (see Figure 1 for a depiction of these types of projects). However, in the spirit of collaboration and maintaining open communication, notification of the Project Team and the Steering Committee of such initiatives is encouraged and serves as a forum for discussion of data sharing efforts and products produced from the system of systems that could be beneficial for future collaboration.

Figure 1. Structure of Iowa's State Longitudinal Data System.



How are decisions made?

SLDS Vision and Direction Decisions

The Steering Committee is responsible for the overall vision and direction of the SLDS. This includes topics such as adding data-contributing partners, expanding data within the SLDS, considering future uses of and needs for SLDS data, and sustainability planning to ensure the integrity and availability of the SLDS during periods in which it is not supported by a federal grant. These types of decisions are made using a consensus decision-making approach, with voting members of the Steering Committee working to settle on a decision that is agreeable to all parties. Ideally, Steering Committee members discuss various perspectives and viewpoints on an issue until they reach a decision that each voting member can live with. However, although consensus is the ideal, the standard for Steering Committee decisions that do not involve data requests is a simple majority.

Critical Data Issues Decisions

The Critical Data Issues decisionmaking process specifies how SLDS partners make decisions that do not have established processes, unlike those for SLDS Vision and Direction decisions and Data Request decisions. This could include urgent situations, such as a data breach, and non-urgent decisions, such as whether to change a standard calculation or add a data element to an existing report.

The Project Team is the point of entry for any SLDS-related issues that arise. The team will discuss the issue and determine what information is required, who should be notified, when, and whether the Project Team should make a decision, make a recommendation, or escalate the issue to the Steering Committee without a recommendation. In some cases, work teams may need to be formed to assess the problem and identify potential solutions. Each partner affected by the issue must be notified of any issues and included in the discussions and solution proposal processes before any final decisions are made. The decision to escalate any issues to the Steering Committee is at the discretion of the Project Team.

Any issues escalated to the Steering Committee will be decided by a consensus among voting members, with input and discussion from all Steering Committee members.

The following principles guide decision-making processes for both the Project Team and the Steering Committee.

- Student privacy will be a primary consideration for all decisions.
- Ethics and security will be a part of every decision the group makes.
- Decisions will be consistent with the goals and objectives of the SLDS.

Data Request Decisions

When data are requested for internal or external use for new projects, the Project Team or the Steering Committee must decide whether to approve or decline the request. Requests are handled differently depending on the requestor, the intended use of the data, and the availability and sensitivity of the data being requested, among other factors. The below describes the general decision-making process for various requestors; companion documents describe the process of creating the data request in detail.

Requests for access to SLDS data for new projects are evaluated by the Steering Committee or the Project Team; which team votes on a particular request is based on various factors and is described below. The voting process is the same for both the Steering Committee and the Project Team so this section describes these processes for the “Deciding Team.”

Each request is considered on a case-by-case basis. One representative from each agency on the Deciding Team from which data are being requested (a Project Team member, for requests considered by the Project Team, and a Voting Member, for requests considered by the Steering Committee) must approve in order to grant the request. Agency representatives whose data are not being requested may provide feedback but cannot cast a vote. All data-contributing partners on the Deciding Team must agree to grant the request in order for the request to be approved; if all parties do not agree, the request can be modified to exclude data from “no”-voting members or to make changes to the request that may be amenable to the “no”-voting members, then reconsidered.

Specifically:

1. Deciding Team members are authorized to vote on data requests involving data from their organization, on behalf of their respective member organizations.
2. Data-contributing partners are given equal voting power in the form of a single vote from Deciding Team members on behalf of their agency for all data requests involving their agency's data.
3. Deciding Team members are authorized to delegate voting rights to an alternate.
4. Data request decisions shall be made by unanimous consent, in which a request is approved if all representatives can "live with" the decision.

Iowa SLDS Data Sharing Policies

Internal or external data requests

Record-level data from the SLDS can be used for research and/or evaluation under the following conditions:

1. The SLDS Steering Committee serves as the research/evaluation review board and must review and approve all data requests that involve matched, de-identified, student-level data from the SLDS for research or evaluation purposes, regardless of the source of the data (a new data merge or the SLDS Data Repository) or the requesting party (an external group or a SLDS partner agency).
2. All Steering Committee members who represent an agency involved in a data request must approve the data request; if any Steering Committee member whose agency's data are involved in the request does not approve, the request must be amended to either exclude that partner's data or to settle on agreeable terms, then reviewed. Steering Committee members whose agency's data are not being requested must be provided an opportunity to give their input on the request but cannot block data sharing for data requests that do not involve their agency.
3. Data requestors must fill out a Data Request Form completely before their data request will be considered by the Steering Committee. There are different forms for external and internal requestors; see the Definitions section for information on who qualifies as an internal or external requestor. The data request form serves as documentation of the purpose and length of the project. For projects that will use a data set created for the request, the data request form will also note the location of the stored data and the date of data destruction.
4. SLDS Repository data cannot be shared or used for research or evaluation unless a data request has been submitted to and approved by the Steering Committee.
5. External groups whose data requests are approved are required to show IRB approval for any projects determined to involve research. In the context of this Agreement, program evaluation is not considered research.
6. If a data-sharing agreement (MOU) covering the proposed data usage is not already in place, one must be approved by the data-contributing partners and enacted before any de-identified, matched, record-level data can be shared.
7. SLDS data-contributing partners have veto power over their shared data. At any time during an approved project, SLDS Steering Committee members from data-contributing partners can opt to revoke permission to use their data for a particular approved project, effective immediately. Data requestors must destroy the data and reapply in order to regain access to the data.

8. SLDS Project Team members will, if needed to fulfill the approved data request, match data from outside groups to data shared within the SLDS, which could include the SLDS Data Repository. Any data elements added to the Repository for the purposes of fulfilling an external data request may not remain in the Repository after the data set is delivered to the external requestor unless adding the data to the Repository is approved by the Steering Committee.
9. Personally Identifiable Information (PII) will be removed prior to sharing data with external groups. Data matches will be performed by SLDS data partners.
10. Data requestors must follow all established business rules related to redaction.
11. Requestors must submit all reports, tables, graphs, and figures to the SLDS Steering Committee for review and approval prior to publication. This review will focus on errors in analysis or methodology and disclosure risk. This review is not intended to include editing suggestions (except to correct errors) or feedback on substantive content or conclusions.

Aggregate data requests

Aggregate data from the SLDS can be provided to requestors under the following conditions:

1. The Project Team evaluates these requests on a case-by-case basis and determines whether they should be approved, denied, or forwarded to the Steering Committee for consideration. Requests for aggregate data which are only slight variations from existing SLDS reports originally approved of by the Steering Committee can be approved/denied at the Project Team level. The team that will decide on a particular data request is called the “Deciding Team” in the remainder of this section.
2. All Deciding Team members who represent an agency contributing data to a request must approve the request; if any member of the Deciding Team whose agency’s data are involved in the request does not approve, the request must be amended to either exclude that partner’s data or to settle on agreeable terms, then reviewed. Deciding Team members whose agency’s data are not being requested must be provided an opportunity to give their input on the request but cannot block data sharing for data requests that do not involve their agency.
3. All requests must be documented and the Deciding Team’s decision must be recorded, but there is no formal, standardized request process for aggregate data (i.e. there is no required form).
4. If a data-sharing agreement (MOU) covering the proposed data usage is not already in place and is needed, one must be approved by the data-contributing partners and enacted before any de-identified, matched, record-level data can be shared.
5. Personally Identifiable Information (PII) is not provided with aggregate data. Data matches will be performed by SLDS data partners.
6. All established business rules related to redaction must be applied.
7. All output (findings, graphics, reports, etc.) using the data must be provided to data-contributing partners on the Deciding Team for review and approval prior to sharing with outside groups. This review will focus on errors in analysis or methodology and disclosure risk. This review is not intended to include editing suggestions (except to correct errors) or feedback on substantive content or conclusions.
8. In order to maintain trust, communication about the use of SLDS data should be ongoing as aggregate data are used or requests are approved. Therefore, the Steering Committee should be

notified of all incoming data requests and the Project Team's decision, if the request is not forwarded to the Steering Committee.

Exploratory research

Record-level or aggregate data available in the SLDS Data Repository can be used by data-contributing partners on the Project Team for exploratory research under the following conditions:

1. The exploratory research option is available only to data-contributing Project Team members who have access to the SLDS Data Repository.
2. Before beginning any exploratory work, Project Team members must notify the Project Team of their intent to explore the data, including the following information:
 - a. A brief summary of the direction of exploration and/or hypotheses to be explored; and
 - b. Intended next steps upon completion of the exploration (e.g., planning a new report, preparing a data request, reporting back to the Project Team, etc.).
3. Exploratory work must be intended to inform a research- or evaluation-related question or idea and should never involve attempting to identify a student or group of students.
4. Findings from this exploratory work may not be released to anyone outside the Project Team or Steering Committee. To release or publish findings, Project Team members must submit a formal record-level or aggregate data request.
5. Raw data used for exploratory analyses must remain in the SLDS Data Repository and cannot be copied or saved to another location. Summary or aggregate data that cannot identify any individual can be saved outside the Repository for the exploratory researcher's use and/or sharing with the Project Team or Steering Committee only.

Who has access to the SLDS Data Repository?

IDOE staff that maintain the system and **SLDS Project Team** members from data-contributing partners, after signing the SLDS Project Team Data Access Confidentiality Agreement.

How is system access controlled?

System access is controlled by secure login and authentication protocols. Data sharing agreements, such as MOUs or data licenses, must be in place for any data sets involving multiple agency data.

What keeps the system and the stored data secure?

- The SLDS Project Team and Steering Committee focus on policies and procedures.
- IDOE's cybersecurity protocols (see Cybersecurity section).

Where are the data system and data tables stored within the SLDS located?

- On a dedicated server within the IDOE system architecture.
- At a secure backup location maintained by the IDOE.

SLDS SOURCE DATA

Each data-contributing partner collects data to serve a wide variety of needs and satisfy federal and state reporting requirements. Data are not collected for sharing to the SLDS; data collected are for other purposes. When data are requested from the SLDS, data-contributing partners determine which data elements to share on a case-by-case basis.

Examples of why data are collected

- Program Administration.
- Accountability and compliance with state and federal laws.
- Transparency.
- Inform education policies and practices, leading to improved student outcomes.

What data we collect

Examples are:

- Student demographic, enrollment, program participation and outcomes.
- Student courses enrolled and course completion data.
- Student assessment/test results.
- Personnel and staffing information.
- School directory information.
- School expenditures and revenues.
- College enrollments out of state and in-state.
- College remedial course-taking data.
- College degree/award completion data.
- FAFSA filing status.

How we collect data

Each agency collects data within its own established data collection mechanisms, and then a subset of those data is added to the SLDS to meet specific approved projects or research and evaluation purposes. Examples of these data collections are:

IDOE-K12

- [Basic Educational Data Survey](#) (BEDS)
- [Student Reporting in Iowa](#) (SRI)

IDOE-Iowa College Aid

- FAFSA
- ICAPS

IDOE-CC

- MIS Fall collection
- MIS Annual collection

Iowa Workforce Development

- Unemployment Insurance Tax Records
- U.S. Department of Labor Registered Apprenticeship
- Workforce Services Programs

BOR

- Regents collections

How data are stored

Each data-contributing partner collects data via their own reporting systems and stores the data in these applications. SLDS data are a small subset of data collected by each partner to meet a specific purpose.

Data are extracted and merged from agency application source systems as needed to prepare reports or address research needs. The SLDS securely joins data from multiple sources and permits connections between unit records data across agencies and longitudinally across time. The SLDS creates a new unique identifier to protect personal, confidential information. The data tables stored in the SLDS Repository, such as to support the PRR and PREP, are stored on a secure server within the IDOE architecture. Data used for reporting or analyses have been de-identified in order to ensure privacy and confidentiality is maintained.

PRIVACY

How is the SLDS protected?

The sensitive nature of the data in the system necessitates that data privacy and security are paramount concerns, particularly when working with personally identifiable information. Student information must be protected above all.

The SLDS is governed by its data owners; see the Data Governance section for more information. Each agency's data are maintained according to that agency's privacy and data security laws and guidelines, as well as all applicable state and federal laws (such as the [Family Educational Rights and Privacy Act](#) (FERPA) and Iowa Code Sections 96.11(6) and 20 C.F.R. 603.9, and the proper handling of confidential Workforce data). As a State of Iowa Executive Branch Agency, Iowa Department of Education data must adhere to the enterprise information technology security standards; the other data partners also fall under these standards with the exception of the Board of Regents, which complies with its own set of standards. Because the SLDS is housed at the IDOE, the security policies of the IDOE apply to the data in the SLDS. [Iowa's Enterprise Information Technology standards](#) include:

- Authentication Security
- Data Classification
- Data Stewardship
- Email Security
- Malware Protection
- Confidential Security and
Emergency Preparedness Data
- Information Security
- Information Security
Compliance
- Interconnectivity
- Laptop Data Protection
- Logging
- Mobile Device Security
- Removable Storage Encryption
- Social Networking Security
- Telework Security
- Vulnerability Management
- Web Application Security
- Wireless LAN Security

Data sharing from each agency to the SLDS is governed by Memoranda of Understanding (MOU) between each contributing agency and the IDOE, which houses the SLDS.

CYBERSECURITY

Cybersecurity can be defined as “the protection of technology systems and networks—including all devices and tools connected to them—against intentional or unintentional attacks or exposure,” (National Forum on Education Statistics 2020). In order to maintain privacy and confidentiality, agencies

must prepare for and guard against cybersecurity attacks. This requires a comprehensive plan that covers the prevention of, response to, and recovery from cyberattacks. The IDOE cybersecurity plan includes the components listed below.

- A comprehensive inventory of all technology assets (including systems, devices, data, and network-connected facility technologies)
- Staff training to reduce cybersecurity risk
- Network security and monitoring plans
- A cybersecurity incident response and recovery plan
- Regular, ongoing reviews of all cybersecurity documentation, plans, and procedures

DATA DISCLOSURE

Data privacy and confidentiality must be maintained in order for the SLDS to continue to be an asset for Iowa. The SLDS provides a framework for sharing data in a secure manner while at the same time, ensuring sensitive data are kept confidential. The SLDS systems leverage the power of data combined from multiple source systems and agency owners to inform and transform education in Iowa. The SLDS provides or reports on sensitive data in a legal, secure and confidential manner. Data disclosure occurs in accordance with all laws and guidelines governing the various data sources, must be agreed to by all agencies contributing data to a particular request, and is limited to the least information necessary for the use case. For information about how data disclosure decisions are made, see the Data Governance section.

How data are shared with the public

- A variety of reports, updated regularly and available online, including:
 - [Postsecondary Readiness Reports \(PRR\)](#)
 - [Iowa School Performance Profiles](#)
 - [Iowa Student Outcomes](#)
 - [Iowa Condition of Education](#)
 - The [Education Statistics](#) page on the Iowa Department of Education website
- Responses to ad hoc requests. Requests for information from the public, media, legislators, etc. are fulfilled using aggregate data and/or summary statistics only.
- Cell suppression is used to limit data for small groups. The SLDS suppression rules are:
 - Suppress cell if numerator or denominator is five or less.
 - If the sum of individuals across all suppressed subgroups is five or less, suppress the smallest and next smallest subgroups to ensure the number of suppressed individuals is six or greater.

How data are shared with educators

PREP Dashboard, which is housed within the [Iowa Education Portal](#) (EdInsight) and available to authorized users only. Authorized access to EdInsight is role-, location-, and user-specific and is limited to Iowa school, district, area education agency, and IDOE personnel. School administrators may grant secure login access to that school's aggregate, non-suppressed data.

How data are shared with external requestors

External requestors are those who are members of the SLDS Project Team from agencies that do not contribute data to the SLDS; non-voting members of the Steering Committee; and anyone that is not part of the SLDS Project Team or Steering Committee. Upon completion of the formal protocol for requesting data, applications are reviewed by the SLDS Steering Committee. If approved, a data set containing the necessary data elements and cohorts is created and securely delivered to the requestor. All approved projects are bound by strict storage, usage, reporting, and disposal rules and monitored by the SLDS Project Team and Steering Committee.

How data are shared with data-contributing Project Team members (internal requestors)

Project Team members from data-contributing partners are considered internal requestors and may request access to the SLDS Data Repository. Prior to receiving access to the Repository, Project Team members must sign a SLDS Project Team Data Access Confidentiality Agreement and any other forms required by data-contributing partners. Data-contributing Project Team members who want to access the data to do exploratory research must follow approved protocols for this type of data access (see the *Exploratory Research* section of the Iowa SLDS Data Sharing Policies, above, for appropriate protocols).

Project Team members from data-contributing agencies who wish to use SLDS data (within or outside the SLDS Data Repository) for research or evaluation purposes and who wish to share findings outside the Project Team or Steering Committee or who wish to publish their work must follow a pre-established protocol for making the data request and receive advance approval from all Project Team partners whose data will be used. See the *INTERNAL Protocol for requesting SLDS data* for more information.

Project Team members from partner agencies that do not contribute data to the SLDS cannot access data directly or via an internal data request. All Project Team members must sign all Confidentiality and Nondisclosure forms appropriate to their level of data access.

ADDITIONAL RESOURCES

The [Privacy Technical Assistance Center \(PTAC\)](#) explains, in plain language, FERPA rights for families as well as responsibilities of institutions that hold student records (U.S. Department of Education).

The [Family Policy Compliance Office \(FPCO\)](#) provides guidance and resources for parents, students, and school officials on FERPA and the Protection of Pupil Rights Amendment (U.S. Department of Education).

[Data: The Missing Piece to Improving Student Achievement](#) is a short interactive guide that illustrates the importance of education data and the efforts underway to make data more actionable (Data Quality Campaign).

[Who Uses Student Data? Infographic](#) and [Video](#) describe the important reasons data are collected, and how student data are—and are not—accessed and used. (Data Quality Campaign)

[A Stoplight for Student Data Use](#) summarizes the main provisions of FERPA and related regulations, including when a student's personally identifiable information may be securely shared under the law (Data Quality Campaign).

DEFINITIONS

1. **SLDS**

A “system of systems” that allows the linkage of data from multiple participating agencies and over time to support student growth and learning at all levels of education and into the workforce. The system allows for secure data sharing for a multitude of uses, including program evaluation, reporting, and identifying trends, gaps, and successes at all educational levels. The system is a mechanism for data sharing between established partners to support a variety of needs.

2. **SLDS data**

Encompasses all data that are shared within the system and then fed into data sets/data products for specific needs or projects, including the SLDS Data Repository when applicable.

3. **SLDS Data Repository**

Data tables containing matched, merged student-level and aggregate data from all data-contributing partners that are stored to support approved research and evaluation projects and enable rapid responses to data inquiries.

4. **SLDS Project Team**

The team charged with the day-to-day operation, maintenance, and progress of the SLDS. Responsible for elevating issues to the Steering Committee as needed. SLDS Project Team members are employees of an SLDS data-contributing agency or partner agency with expertise regarding the data and its uses who have completed the Project Team Confidentiality Agreement appropriate to their level of data access.

5. **SLDS Steering Committee**

The group charged with governance and establishing the overall direction of the SLDS.

6. **SLDS data partner**

An organization or representative thereof that is a member of the SLDS Project Team, whether the organization contributes data or not.

7. **SLDS data-contributing partner**

An organization or representative thereof that is a member of the SLDS Project Team and that contributes data to the SLDS.

8. **External requestor**

An individual or part of a group who requests access to SLDS data who does not meet the definition of an internal requestor. Specifically, this includes members of the SLDS Project Team from agencies that do not contribute data to the SLDS; non-voting members of the Steering Committee; and anyone that is not part of the SLDS Project Team or Steering Committee.

9. **Internal requestor**

An individual or part of a group who requests access to SLDS data who is a member of the SLDS Project Team from a data-contributing agency or is a voting member of the SLDS Steering Committee.

FORMS AND FILES

02_Protocol for requesting SLDS data	Guide for external data requests. Companion document to 03_Data_Request_Application.
03_Data_Request_Application	Application for external data requests. Companion document to 02_Protocol for requesting SLDS data.
04_INTERNAL_Protocol for Requesting SLDS data	Guide for internal data requests. Companion document to 05_INTERNAL_Data_Request_Application.
05_INTERNAL_Data_Request_Application	Application for internal data requests. Companion document to 04_INTERNAL_Protocol for requesting SLDS data.
06_SLDS Project Team Data Access Confidentiality Agreement	Confidentiality form to be signed before Project Team members from data-requesting agencies receive access to the Data Repository.
07_SLDS Project Team Confidentiality Agreement	Confidentiality form to be signed upon joining the Project Team.
Adding Data to the SLDS	Process for SLDS data-contributing partners to add data to the SLDS.
SLDS Data Request Log	File containing all SLDS data requests, including aggregate and record-level requests.
SLDS_Repository_Data_Dictionary	Data dictionary for all data elements in the SLDS Repository.

COMMITMENT

As voting members of Iowa's SLDS Steering Committee, we acknowledge our respective agencies' commitment, as data-contributing partners, to the importance and value of Iowa's SLDS. Our signatures below affirm our unanimous agreement with the policies and procedures set forth in this document.

Rachel Boon

Rachel Boon (Jun 24, 2024 07:39 CDT)

Rachel Boon
Board of Regents

DF

David Ford
Iowa Department of Education (Iowa College Aid)

A Gieseke

Amy Gieseke (Jun 26, 2024 12:06 CDT)

Amy Gieseke
Iowa Department of Education (CC)

Jay Pennington

Jay Pennington
Iowa Department of Education (K12)

RM

Ryan Murphy
Iowa Workforce Development












Data Governance Manual061924

Final Audit Report

2024-07-02


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