



CEBP

State Legal Perspectives

Illinois

9 September 2016

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Illinois Perspectives

1. Public vs. Private Universities - access to UI data - 20 C.F.R. § 603.

2. Data sharing agreements

- **the Illinois Enterprise Memorandum of Understanding**

1. Public vs. Private Universities: access to UI data

Code of Federal Regulations on Employee Benefits (Title 20 of the CFR)

20 C.F.R. § 603.4 requires us to keep UI data confidential

20 CFR § 603.5(e) permits us to share UI data with a “public official”

20 CFR § 604.2(d) says that a “public official” can include:

(5) A State educational authority, agency, or institution as those terms are used in the Family Educational Rights and Privacy Act, **to the extent they are public entities.**

2. Data Sharing Agreements

The Illinois Enterprise Memorandum of Understanding (eMOU) on data sharing

- Internal (but externals are in the works)
- Establishes common agreed to framework and terms
- Employs active management by an Operational Committee
- Contemplates, but does not require, a technological platform across which the data would be shared
- Rapid, compliant, flexible

2. Data Sharing Agreements

The Illinois Enterprise Memorandum of Understanding (eMOU) on data sharing

- Educational institutions at all levels (public and private)
- Local units of government
- Business workforce groups
- Criminal justices groups



Thank you