

DATA SHARING GUIDELINES

In an effort to promote accountability and transparency while also encouraging best practices to promote data privacy, ensure enterprise data consistency, and reduce the duplication of efforts, the Office of Institutional Research and Decision Support (IRDS) has established the following guidelines pertaining to the release of institutional data. These are not meant to supersede the Institutional Data Management Policy (10.13), but rather to help clarify best practices for ensuring accuracy in source data and principles for proper data management.

Record Level Data

Official record level student data is housed in OPUS as maintained by the university Office of the Registrar. Similarly, HR data is housed in PeopleSoft. Access to unit record data for any source is dependent upon authorization from each data steward. IRDS cannot distribute record level data without authorization from these parties. Similarly, unofficial de-identified data may only be released in accordance within established guidelines (e.g. FERPA) permitting sharing for educational and organizational improvement purposes. Direct access to data through the steward and systems (OPUS, PeopleSoft, Compass, Data Warehouse) is the preferred route to unit records.

Summary Data

IRDS is happy to provide summary data across all topics for the institute. This includes, but is not limited to, areas such as admissions, enrollment, degrees awarded, faculty, and finance. A primary objective of IRDS is to provide custom support to Emory units to promote the transparent sharing of data to enhance business practices and decision support. These projects might include external reporting requirements, internal data consulting, establishing business intelligence dashboards, or building out data structures and warehouses. Yet it is also important to protect the underlying data that is central to these efforts. In order to protect the privacy of Emory student records, cell sizes less than 5 for graduate students or 10 for undergraduate students is subject to redaction. This effort ensures compliance with FERPA and strengthens the privacy rights associated with non-directory level information as specified in the Institute Data Management Policy and the Office of the Registrar's Policies and Procedures Under FERPA. For HR and financial data, similar redaction or rounding may be appropriate depending on the business case and audience. For general access to summary data, public information is available on the IRDS website via the Academic Profile.

External Data

Emory participates in many data exchange agreements with third parties. This includes publicly available data through IPEDS and the Common Data Set. Yet other data are more restricted in their access for rankings and data exchange consortiums. The ability to share this data is subject to the guidelines imposed and agreed upon for Emory's participation with the external party. As an example, *U.S. News and World Report* rankings are stored on their proprietary website and publication. Access to this information is subject to subscription, not via the license provided to IRDS. Other information, such as that shared through the Association of American Universities Data Exchange (AAUDE) is even more restricted with specific personnel authorizations and sharing agreement guidelines. The access and use of data to which IRDS is privileged is subject to review based business needs and intended audience.

DATA SHARING GUIDELINES (CONT.)

Unofficial Data

In addition to official data provided by the data stewards, IRDS maintains repositories of unofficial data that are used for internal business functions. This data is constructed to assist in reporting requirements such as different definitions published from survey to survey. For example, the American Bar Association and IPEDS use different snapshot dates. Other data may have been manipulated to assist with dashboards, redaction techniques, or otherwise summarizing information. These unofficial data files are for internal use only and not to be shared in their raw forms across the institution as the context and operational requirements may lead to misleading outcomes for those untrained in the syntax or variables. Those needing raw data should be pointed to the official records maintained by their respective steward. Those needing summarized information may be granted access to the summary reports upon filing a request with IRDS or accessing one of the publicly available summary statistics websites.

Effective Date: October 4, 2018

DATA SHARING GUIDELINES (CONT.)

Restatement of Important Principles in the Institutional Data Management Policy

<http://policies.emory.edu/10.13>

Shared Resources: Institutional Data are a university resource that may be used and relied upon by many users. Sharing information across academic and administrative units should be facilitated where appropriate.

Integrity and Security: Data integrity and security begin with the person or office creating the data, and are the continuing and shared responsibility of all who access and use them. Institutional Data must be protected and managed at all levels to ensure their integrity. Institutional Data should be safeguarded to maintain the confidentiality and privacy of personally identifiable information and must be protected against systematic errors, loss, and security breaches.

Accessibility: Access to University data should enhance the ability of the University to achieve its mission. Wherever possible, Institutional Data should be made available to all members of the University who have a legitimate business need for the data for academic, research or administrative purposes.

Training: All Data Users must receive training in the structure and definitions of Institutional Data as well as relevant policies prior to accessing data.

Privacy and Confidentiality: Data Users must respect the privacy of individuals whose records they may access. No subsequent disclosure of personal information contained in files or databases may be made. Disclosure is understood to include (but is not limited to) verbal references or inferences, correspondence, memoranda and sharing of electronic files. Institutional Data must be stored in such a way as to ensure that the data are secure, and that access is limited to authorized users. When electronic data are no longer required for administrative, legal or historical reasons, it should be deleted in such a way that recovery is not possible.

Data Extraction, Manipulation, and Reporting: Every data user must recognize that Institutional Data and information derived from it are potentially complex. It is the responsibility of every Data User to understand the data that they use, and to guard against making misinformed or incorrect interpretations of data or misrepresentations of information. Where appropriate, the Data Steward should be consulted when information is used or reported outside of the Data User's functional unit.

Data Integrity: Institutional Data must be protected and managed at all levels to ensure their integrity. Employees who identify inaccurate, inconsistent or unreliable data should notify the appropriate Data Steward within 5 business days. The Data Steward shall within five business days document the error and correct the data and/or refer the problem to the Director of OIR and the appropriate Data Trustee. Problems may also be reported anonymously through the Emory Trust Line 1-888-550-8850 or Emory Trust Line Online at <https://www.mycompliance.com/EmoryTrustLineOnline>.

DATA SHARING GUIDELINES (CONT.)

Restatement of Important Principles in the Emory Policies Under FERPA

<http://registrar.emory.edu/Students/FERPA/index.html>

Directory Information

The following categories of information have been designated directory information:

- Name
- Whether or not the student is currently enrolled
- The school or division in which the student is or was enrolled and the class/year
- Dates of enrollment including full-time or part-time status
- Degree or degrees earned, date of degree, major area of concentration and academic honors received
- Awards of merit and participation in officially recognized activities and sports
- Address and telephone number
- Electronic mail address

Directory information may appear in public documents and may otherwise be disclosed without student consent unless the student objects as provided below.

Prior Consent Not Required

Prior consent may not be required for disclosure of education records to the following parties:

- School officials of Emory University who have been determined to have legitimate educational interests. School officials include instructional or administrative personnel who are or may be in a position to use the information in furtherance of a legitimate objective, a person serving on the Board of Trustees, a student serving on an official committee, such as a disciplinary committee, a volunteer or contractor outside of Emory who performs an institutional service or function for which Emory would otherwise use its own employees and who is under the direct control of the institution with respect to the use and maintenance of personally identifiable information from education records. Legitimate educational interests include those interests directly related to the academic environment;
- Officials of other schools in which a student seeks or intends to enroll or is enrolled. Authorized representative of the Comptroller General of the U. S., the Attorney General of the U.S., the U. S. Secretary of Education, and State and local educational authorities, but only in connection with the audit or evaluation of federally supported educational programs, or in connection with the enforcement of or compliance with federal legal requirements relating to these programs. These officials will protect information received so as not to permit personal identification of students to outsiders, and the data shall be destroyed when no longer needed for the purposes above;
- In connection with a student's application for, or receipt of, financial aid, but only to the extent necessary for such purposes as determining eligibility, amount, conditions, and enforcement of terms or conditions;
- Organizations conducting educational studies for the purpose of developing, validating, or administering predictive tests, administering student aid programs, and improving instruction. The studies shall be conducted so as not to permit personal identification of students to outsiders, and the information will be destroyed when no longer needed for these purposes;
- Accrediting organizations for purposes necessary to carry out their functions;

DATA SHARING GUIDELINES (CONT.)

- Parents of a student who is a dependent for income tax purposes;
- Appropriate parties in connection with an emergency, where knowledge of the information is necessary to protect the health or safety of the student or other individuals;
- In response to a court order or subpoena (The University will make reasonable efforts to notify the student before complying with the court order);
- A victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense. This disclosure may only include the final results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding;
- Parents of a student under the age of 21 who has been found with an alcohol-related disciplinary violation.

Prior Consent Required

In all other cases, the University will not release personally identifiable information in education records or allow access to those records without prior consent of the student. Unless disclosure is to the student himself or herself, the consent must be written, signed and dated, and must specify the records to be disclosed and the identity of the recipient.

Confidentiality and Release of Information About Students

The following guidelines relative to student records represent Emory University policy. Emory University, like other institutions of higher education, accumulates and maintains records concerning the characteristics, activities and accomplishments of its students. Because the University recognizes the student's right of privacy, a policy regarding the confidentiality of the information which becomes a part of the student's permanent records and governing the conditions of its disclosure has been formulated and adopted. This policy reflects a reasonable balance between the obligation of the University for the protection of the rights and privacy of the student and its responsibility to society.

Emory University is committed to protecting students from improper disclosure of private information. In order to do so, the University must make every endeavor to keep the student's record confidential. All members of the faculty, administration and clerical staff must respect confidential information about students which they acquire in the course of their work. At the same time the University must be flexible enough in its policies not to hinder the student, the institution or the community in their legitimate pursuits.

Each of the record-keeping administrative units within the University may develop its own additional specific procedures in accordance with the general policy stated here.

- All procedures and policies dealing with records shall be formulated with due regard for the student's rights for privacy, freedom of association and expression and intellectual liberty and freedom to learn.
- Only those records shall be kept which are necessary in order to meet the University's or student's goals.
- Duplication of record keeping shall be minimized.
- All persons who handle student records shall be instructed concerning the confidential nature of such information and their professional and legal responsibilities regarding these records.

DATA SHARING GUIDELINES (CONT.)

- Information from University files, which is not of public record, shall not be available to unauthorized persons without the written consent of the student involved.
- The University will comply with and abide by all federal and state laws which apply directly to the University and the Confidentiality and Release of Information About Students--in particular, the federal Family Educational Rights and Privacy Act of 1974 (FERPA).
- The University Registrar and the Oxford College Registrar are the official custodians of academic records at Emory University and Oxford College respectively and therefore are the only officials who may issue an official transcript of academic record.
- Records shall be released to comply with a subpoena or court order only with the consent and advice of the University's legal counsel.
- A record shall be maintained, kept with the record of each student, of the release of any information contained in a student's files to individuals or agencies outside the University; including the name of the requesting individual or agency, date, and purpose of the request. This record of access shall be available to the student.
- All University policies governing the maintenance and release of student records are public and are available to students, faculty, and administration.