Student-Level Data Reporting Guidelines
Indiana University-Purdue University Indianapolis (IUPUI) Campus

BACKGROUND AND PURPOSE OF GUIDELINES

As IUPUI continues to engage in data-driven decision making at all levels of the campus, effective data governance is essential to providing trusted, secure, timely, high-quality data consistently to all users. Over the years we have witnessed an increase in demand for student-level data to be used for program evaluation, assessment, institutional research, strategic planning and more. Moreover, there has been a growth in the amount of individual student-level data collected and stored electronically in various systems (e.g., survey data, institutional data, advising notes, etc.).

CURRENT MEMBERS OF THE STUDENT-LEVEL DATA ADVSORY COUNCIL IUPUI INDIANAPOLIS

The purpose of the *Student-Level Data Advisory Council* from this day forward is to advise the IUPUI campus community on how we might ensure data availability and quality, while also carefully preserving individual student privacy and reducing response burden associated with student surveys.

1. (Chair) Executive Director, Institutional Research and Decision Support (IRDS)
   o Current Member: Michele Hansen, Ph.D., Executive Director, , Institutional Research and Decision Support (IRDS)
2. Director of Institutional Research and Assessment, IRDS
   o Current Member: Steve Graunke, Director of Institutional Research and Assessment, (IRDS)
3. Director of Survey Research and Evaluation, IRDS
   o Current Member: Anne Mitchell, Director of Survey Research and Evaluation, IRDS
4. Registrar
   o Current Member, Mary Beth Myers, Registrar, Division of Enrollment Management, Office of the Registrar
5. Director of Student Financial Services
   o Current Member: Marvin Smith, Director of Student Financial Services, Division of Enrollment Management
6. Associate Dean for Student Affairs, University College; Executive Director of Student Success Initiatives, Division of Undergraduate Education
   o Current Member, Cathy Buyarski, Ph.D., Associate Dean for Student Affairs, University College; Executive Director of Student Success Initiatives, Division of Undergraduate Education
7. Director of Career and Advising Services
   o Current Member: Matt Rust, Director of Career and Advising Services
8. Director of Assessment and Planning, IUPUI Division of Student Affairs
   o Current Member: Vacant

RECOMMENDED PROCEDURES FOR REQUESTING AND PROVIDING STUDENT-LEVEL DATA

1. General Procedures

These proposed procedures relate to IU employees, faculty, and administrators requesting student-level data and information. Articulating one policy that applies to all types of requests for student-level data is met with challenges due to the wide-range of requests as well as existing formal policies and procedures guided by Institutional Research Board (IRB), Family Educational Rights and Privacy Act (FERPA), the IU Committee of Data Stewards, etc. As such, this document articulates some general procedures related to the release of student-level data.

The taskforce members will serve as an advisory council and ad hoc review of student-level data requests for the office of Institutional Research and Decision Support, Office of Student Financial Assistance, Office of the Registrar, Director of Career and Advising Services, etc. at IUPUI Indianapolis and other groups and individuals on campus. As such, the existence of the advisory group will help ensure greater scrutiny of data management and protection practices.

2. Definition of Student-Level Data

Student-level data refers to data and information provided at the individual level of analysis (where individual records can be linked to a student and the student is identifiable) rather than aggregate or summary-level information. Student-level data refers to any information that IUPUI (or IU) collects on individual students, including data such as:

- demographics and personal information (e.g., a student's age, gender, race, place of residence),
- enrollment information (e.g., campus, school, course level, credit hours, student's current academic level, years of enrollment),
- academic information (e.g., the courses a student completed, the test scores and grades a students earned, the academic requirements a student has fulfilled),
- other forms of students data collected and used for decision making.

Student-level data denote information about students, either contributed by the individuals themselves in surveys or as part of institutional records. Requested information may be part of the Student Information Systems (SIS), Indiana University Information Environment (IUIE), Advising Records (AdRx), Simplicity, Human Resource Records related to the individual's status as a student, and more.

3. IUPUI Release of Student-Level Data Review Process and Procedures

Information Requester

For individuals who already have access to student-level data, other university access policies and procedures continue to apply. If student-level data is requested of various of offices including such as the Office of Institutional Research and Decision Support, Office of Student Financial Assistance, Office of the Registrar, Director of Career and Advising Services, etc., the requester will be asked to complete an IUPUI *Student-Level Information Request Form* which may vary by office and at the minimum will ask the requester to provide:

- name, title, contact information;
- what information is requested;
- whether or not individual-level or identifiable information is requested;
- intended use of the information;
- who the information will be shared with and how (e.g., in summary or individual-level);
- clear explanation of a data management and security plan (e.g., how the data will be stored; password protected, secure environment);
- clear explanation of how plan the requester plans to maintain accuracy and integrity of information (e.g., data analyses, presentation formats, research methods and approaches)

The requester will also be asked read the following:

- By completing this form, you agree that you will not transfer the information provided to other individuals or parties not listed in the original request and reflected in the description of the use of the information.

The requester must also:

- *Complete a Student-Level Data Request Form* (including completion of the Acceptable Use Agreement and FERPA tutorial if not already completed) https://ferpa.iu.edu/;
  https://www.iu.edu/~asqa/page/enterprise_app_compliance.php

- Provide Institutional Research Board (IRB) approval as necessary and formal proof of approval.

Information Provider

Similar to the expectations at the University level, individuals providing access to student data based on campus needs want to assure there is legitimate need to know/have access to that information, that the receiver of the data understands their obligations in the protection and use of that data, etc. These requests are from various sources and submitted to various

offices including the office of Institutional Research and Decision Support, Office of Student Financial Assistance, Office of the Registrar, Director of Career and Advising Services, etc.   As a result, the Student Data Policy Taskforce makes the following recommendations for campus ad hoc requests and access to student data.

> *Require the completion of a Student-Level Data Request Form* (including completion of the Acceptable Use Agreement and FERPA tutorial if not already completed)

> *Obtain counsel from the Student-Level Data Advisory Council* (for cases where the data coordinator seeks counsel/advise on a specific request)

- **If the procedures above are followed and the Information Provider considers the request reasonable and legitimate, the request for information will be granted.**

- **If the Information Provider is not comfortable with the request, the Information Provider may ask for consultation with the Student Level Data Advisory Council.**

- **In cases where the requested information is denied, the Information Requestor may appeal to the Executive Vice Chancellor.**

APPENDIX A: Additional Information About Student Level Data Access

SENSITIVE DATA

In the course of its academic mission and its day-to-day administration, Indiana University collects large amounts of personal data on its students. Much of this data is not sensitive, and is in fact publicly available (e.g., names and telephone numbers). However, some of it is sensitive, including personal, financial, and legal information. Sensitive data include information protected by Indiana or federal law as well as that protected by university policy. For details, see Management of Institutional Data (DM-01).

BACKGROUND ON UNIVERSITY SYSTEM ACCESS

Committee of Data Stewards
The Committee of Data Stewards are responsible for establishing policies, procedures, and guidelines for management of institutional data across Indiana University. Individually, each of the Data Stewards have management and policy-making responsibilities for specific data subject areas, as part of the virtual institutional data base.
http://datamgmt.iu.edu/

IUPUI Access Coordinators
There is an online lookup to determine who the Access Coordinator is for a unit:
https://apps.usss.iu.edu/datamgmt/aboutus.cfm

For a complete list of IUPUI Access Coordinators, contact the IUPUI Office of the Registrar.

Access Coordinators assess and submit requests for system access. For units that do not have an established Access Coordinator, they submit their requests for access through the Office of the Registrar where the assessment takes place.

IUPUI Data Managers
For IUPUI Student Records, three individuals in the Office of the Registrar and two UITS security staff process requests for student system and data warehouse (IUIE) requests. This role comes into play primarily with IUIE requests as there is need for scrutiny on what data can be accessed via reports.

Student System Access Process
1. To request access to any student data system, employees must contact the **Access Coordinator** within their area. If they don't have an approved Access Coordinator, requests are sent to the Data Managers in the Office of the Registrar. Individuals requesting access must complete the following compliance requirements:
    ● Sign the Acceptable Use Agreement
    ● Complete the FERPA Tutorial
    Full details are available at this website: https://usss.iu.edu/Pages/Security%20Resources.aspx.
    Exceptions. In the case of the Advising Records (AdRx) system, not all data access coordinators have the ability to grant access to AdRx. In some cases, employees requesting access will need to contact the Director of Campus Career and Advising Services. In the case of the Symplicity system—which contains information imported from SIS such as GPA, school of major, career courses completed, transfer status, class standing, degrees earned, etc.—access procedures are defined in the Symplicity MOU. Career services professionals should consult with their Career Services Director in their school or with the Director of Campus Career and Advising Services in order to obtain access.

2. The Access Request Management System (ARMS) is used as the IU "portal" for requesting and assigning access to these systems. ARMS does store information as to whether or not someone has completed the Acceptable Use Agreement and the FERPA Tutorial.

3. Information on whether an individual has completed the Acceptable Use Agreement and/or FERPA tutorial can be found here: https://www.iu.edu/~asqa/page/enterprise_app_compliance.php