

*Updated January 19, 2018*

# **AAUDE Data Sharing Guidelines and Confidentiality Rules**

## ***General Introduction***

The purpose of the Association of American Universities Data Exchange (AAUDE) is to facilitate and coordinate the exchange of data and information among its members, and to continually enhance efficiency and consistency in collecting and exchanging data. The AAUDE values a free exchange of timely and accurate information while fully appreciating privacy and confidentiality requirements.

While many exchange items are designated public and have very limited restriction regarding their use, other exchange items contain sensitive information that exchange participants consider confidential. For these members, the privacy of individuals and the confidentiality of member institutions needs to be protected.

To encourage maximum participation in data exchanges, AAUDE member institutions must have confidence that shared data are stored in a safe and secure manner, and are used in accordance with established data-sharing rules and guidelines when presented and disseminated. It is also vital that the AAUDE minimize the potential risk of public disclosure of sensitive data. Thus, the overarching goal of data policy is to strike a balance between data access and confidentiality.

## ***Compliance and Enforcement***

Amendments to this policy are anticipated as organizational needs change and as data management and security standards evolve along with technology. The AAUDE Council will review proposed changes and inform membership of approved changes well in advance of their implementation.

The AAUDE Council coordinates the review and resolution of risk management issues related to AAUDE data access, storage, and distribution at participating institutions and among all approved users. Institutions may be notified of the misuse of data as part of the review process, and may take ultimate responsibility for reaching a decision on future disciplinary action.

Failure to comply with specified AAUDE rules and guidelines may result in disciplinary actions. In the most severe cases, noncompliance may result in the loss of access to exchange items and other AAUDE information.

## ***Responsibility for Observing Rules and guidelines***

When participating in AAUDE, each member institution agrees to honor the confidentiality of all data so designated and to abide by all data-sharing rules and guidelines, both those general to AAUDE and those added specifically for individual exchange items.

Responsibility for developing data-sharing guidelines and policies and ensuring their observance is vested in the AAUDE Council, the governing body established to coordinate the association's activities.

The AAUDE Staff, as directed by Council, are responsible for the operational management of central AAUDE data resources. The AAUDE Staff ensure that AAUDE data are safely and securely maintained in a manner that is consistent with industry standards, in order to minimize the risk of accidental release or intentional theft.

In addition, member institutions rely upon their designated representatives to ensure that AAUDE data are used in a safe and appropriate manner. The Primary Representative, designated by each member institution, is responsible for ensuring appropriate use of AAUDE data by his/her institution. The Primary Representative, in collaboration with the Alternate Representatives at his/her institution, must work to ensure that AAUDE data sharing rules and guidelines are observed at their institution and that data confidentiality is protected.

The Primary Representative at each institution plays an essential role by:

- Administering the Memorandum of Understanding (MOU) at their institution and providing on-going support and oversight to individuals having direct access to AAUDE data.
- Serving as an AAUDE liaison at their institution to answer questions regarding use and distribution of AAUDE data locally.
- Familiarizing other users at their institution on the policy details and the level of confidentiality associated with each exchange item.
- Monitoring local users with AAUDE website access.
- Acknowledging special data sharing rules and guidelines associated with data either locally or with AAUDE exchange items.

Any individual requesting direct access to AAUDE data sources, including the website and its data warehouse, shall be required to sign the MOU. The MOU documents that all individuals granted access to AAUDE data have agreed to use said data in an appropriate manner.

## **Data Security**

### **Central AAUDE Resources**

The AAUDE Data Sharing and Confidentiality Rules apply to all AAUDE data resources, including, but not limited to, the AAUDE warehouse, the AAUDE website, and the AAUDE Tableau platform.

### **Local storage of AAUDE data by institutional representatives**

AAUDE representatives must take all appropriate measures, as identified by their institution, to protect AAUDE data from being accidentally disclosed or stolen. While security requirements vary by institution, AAUDE has identified the following practices as a minimum standard for securing AAUDE data during its use by AAUDE representatives and others granted access:

- All transmissions of data from AAUDE servers to institutional computers should be encrypted.
- AAUDE data resources, such as warehouse tables, should not be mirrored to local servers or rebroadcast to local university systems unless those resources are provided as part of an approved institutional account. No AAUDE confidential data is provided as part of an institutional account.
- Computers and media used to store AAUDE data should be protected by a strong password. It is also recommended that all storage media used to store AAUDE data be encrypted. Storage of AAUDE data on laptops, tablets, portable drives, and portable media is discouraged, but if this is necessary the portable media should be encrypted. All storage media should be regularly patched, updated and scanned by security software in accordance with institutional practices.
- Primary representatives are responsible for ensuring that other users (Dean's offices, task forces, etc.) are properly informed about both institutional and AAUDE confidentiality policies and that data sharing across larger audiences is regulated according to these policies. They are also responsible for certifying that other approved users of AAUDE data have read and understood the relevant policy documents and have completed the MOU (available at <http://aaude.org/requesting-access>) on an annual basis.

### **Categories of Exchange Items by Level of Confidentiality**

The degree of confidentiality required by AAUDE data varies substantially. To balance the need for free, unimpeded use of data with the need for ensuring confidentiality, it makes sense to group exchange items into categories and establish data-sharing rules and guidelines for each category. The four categories of exchange items are:

1. Publicly reported data
2. Ad hoc/special requests
3. Confidential exchange items

4. Confidential exchange items with additional rules

Each existing AAUDE exchange item has been placed in one of these four categories, depending on the level of confidentiality involved. As new exchange items are added, the AAUDE Council will evaluate and assign each to the appropriate category. The level of confidentiality is identified on each exchange item’s web page.

Practices for data sharing are acknowledged to be contingent on the specific audience that reports are distributed to locally and dependent on the exchange item and level of detail associated with each report.

*Table 1. Categories of Exchange Items by Level of Confidentiality (as of 9/23/2013)*

<i>Level of Confidentiality</i>	<i>Exchange Item</i>
<i>Publicly Reported Data</i>	<ul style="list-style-type: none"> <li>- AAUP Faculty Salaries</li> <li>- IPEDS Fall Enrollment</li> <li>- IPEDS Completions</li> <li>- IPEDS Human Resources</li> <li>- IPEDS Institutional Characteristics</li> <li>- IPEDS Finance</li> <li>- Peer Institutions</li> <li>- NSF Graduate Student Support</li> <li>- NSF R&amp;D Expenditures/NSF HERD</li> <li>- Tuition and Required Fees</li> <li>- “Florida Links” to Annual Financial Reports, Organization Charts, and Fact Books</li> </ul>
<i>Ad Hoc and Special Requests</i>	<ul style="list-style-type: none"> <li>- Ad Hoc Requests</li> </ul>
<i>Confidential Exchange Items</i>	<ul style="list-style-type: none"> <li>- Faculty Profile by CIP</li> <li>- CSRDE Graduation and Retention Rates</li> <li>- Administrative Salaries</li> <li>- Current Developments Survey</li> <li>- Delaware Teaching Load and Cost Survey</li> <li>- Doctoral Time-to-degree</li> <li>- Doctoral Completion Rates</li> <li>- Enrollment Detail by CIP and Race/Ethnicity</li> <li>- First-time Freshman Profile</li> <li>- Graduate Assistant Stipends</li> <li>- Undergraduate Time-to-Degree</li> <li>- Roundtable Exchange</li> </ul>
<i>Confidential Exchange Items with Additional Rules</i>	<ul style="list-style-type: none"> <li>- Faculty Salaries by CIP</li> <li>- Doctoral Exit Surveys</li> <li>- Faculty Surveys</li> <li>- Graduating Senior Surveys</li> <li>- National Survey of Student Engagement</li> <li>- Alumni Surveys</li> <li>- AAUDE Survey of Faculty Benefits (discontinued)</li> </ul>

1. Publicly Reported Data

The exchange items in this category are publicly available. They include: periodic surveys conducted by the Department of Education’s National Center for Education Statistics (NCES) through the Integrated Postsecondary Education Data System (IPEDS) system, surveys by the National Science Foundation (NSF) and other data collection agencies.

These exchange items are not subject to AAUDE’s data-sharing guidelines and confidentiality rules. However, users of these data are expected to: (a) observe the collection agency’s confidentiality rules and cautionary notes, and (b) not publish any of these data before they are publicly released by the collection agency.

## 2. Ad Hoc/Special Requests

Member institutions regularly send various inquiries and special requests to exchange participants. Such inquiries and special requests are not deemed confidential unless specified by the inquiring or the responding institution. Specifications of confidentiality should be made explicitly during the exchange of data or information.

An institution that conducts an inquiry or a special request is expected to share appropriate summaries of the results of the inquiry or special request with the exchange group as soon as it compiles the responses. A summary should not be issued with both institution names and their corresponding AAUDE codes in order to restrict distribution of these codes.

## 3. Confidential Exchange Items

This category of exchange items contains sensitive information that exchange participants have defined as confidential. Thus, establishment and observance of data-sharing rules and guidelines for these items are essential. These rules and guidelines are evolving, and adjustments to policy will be necessary in the future to reflect changes in exchange items and levels of privacy. The confidential exchange items are listed in the Table 1.

Users should observe the following guidelines when using data from confidential exchange items:

1. Use aggregated data (e.g., mean, median, range) in reports when appropriate and possible.
2. Identify an institution as a member of a known category of institutions comprising a given set of confidential data in a report (e.g., public research university, private research university, land-grant university, etc.).
3. Use only codes (but not the AAUDE code), and not names of institutions when reporting individual institutional data.
4. An institution may be identified by name or any publicly available and recognizable code (e.g. FICE code) when reporting institution-specific data only if prior approval has been obtained from that institution.
5. A brief statement acknowledging the source of data and any restrictions associated with the data should be incorporated into the prefatory sections of any reports and/or presentations that use AAUDE data.

Data may be shared at a finer level of detail with the highest ranks of university administration, as these officials are presumed to understand confidentiality policies and be able to honor AAUDE restrictions. As the composition of the audience becomes less secure and/or the risk of inappropriate disclosure of confidential information increases, the rules on permissible data presentation adjust accordingly in terms of minimum level of aggregation and level of institutional identification (e.g., requiring the aggregation of data from a minimum number of peer institutions). Table 2 shows guidelines for acceptable use by audience.

**Table 2. Guidelines for Acceptable Use of Analysis and Summaries of AAUDE Data by Audience**

<i>Use of Analysis and Summary Data</i>		<i>A. Board of Trustees and Senior Campus Officers</i>	<i>B. Governance Groups and Other Campus Officers</i>	<i>C. Campus-at-large or Public</i>
I	Institution's own data	Institutional decision		
II	Data aggregated within groupings of at least three institutions and institutions are not identified in the analysis/presentation	Agreement that presentation use is acceptable.		Generally unacceptable. Consult caretaker or Director
III	Data aggregated within a peer grouping of at least three institutions and the institutions are identified in the analysis			
IV	Data from specific institutions that are either not identified or their identities are masked in the analysis-specific data from unidentified or masked institutions	Agreement that presentation use is acceptable, but distribution of hard copy should be done with <i>extreme caution</i>		
V	Data from institutions that are identified in the analysis/presentation	Use with <i>extreme caution</i>		<b><i>Not acceptable in any circumstances</i></b>

#### 4. Confidential Exchange Items with Additional Rules

Some AAUDE exchange items contain data that are considered highly confidential and/or sensitive by contributing institutions. These data are shared with the understanding that additional rules are needed to govern their dissemination and that users of these data will abide by these rules. Additional rules serve as add-ons to ensure an additional appropriate level of data security. Failure of data users to abide by these additional rules could jeopardize the continued participation of some institutions in the exchange item.

The confidential exchange items with additional rules are listed in the Table 1. The web page for each of these exchange items should be consulted for the specific rules and guidelines that govern the use and dissemination of data from that exchange item.

Additional rules are proposed by the caretaker of an exchange item, assisted by a working group established to develop those rules. The AAUDE Council, upon approval of the special rules, posts them on the webpage of the exchange item.

*The rules and guidelines listed under Category 3 above also apply to the exchange items in Category 4.*

## **General Data Sharing Rules and guidelines**

**“No Submission, No Access” Principle:** Access to exchange items is intended for those member institutions who [regularly] submit data for that exchange item. Institutions that do not [regularly] contribute data to an exchange item should refrain from using its data except to inform decisions about whether to submit data in the future. Given the differences in the submission cycles, the definition of whether an institution [regularly] contributes will vary by exchange item; this information is not on item web pages. Non-participants in an exchange item may be denied access.

**Institutional Legal and Cultural Difference:** The legal and cultural framework under which each member institution operates varies considerably. While data sharing among public universities tends to be less restrictive than among private universities, public institutions are also subject to public records laws that do not apply to private institutions. Users of AAUDE data should be cognizant of such differences and use the data accordingly.

**Use of Data with Small Number of Cases:** Re-identification of individual persons may be possible when a small number of individuals share a single characteristic such as gender, race/ethnicity, disability status, etc. In order to minimize the risk of re-identifying individuals, AAUDE data users should not report summaries pertaining to a cell size of fewer than five individuals. Some exchange items may have more stringent requirements and require larger cell sizes.

**Combining data from two or more exchange items:** Data products derived from two or more exchange items should be used in a manner that is consistent with the item having the most stringent data use rules. For example, a report on degrees conferred per faculty member may be based upon IPEDS Completions (a public item) and Faculty Profile by CIP (a confidential item). This report should follow the stricter Faculty Profile by CIP data use rules. This should be treated as a general rule for confidential data. More detailed protocols required by specific exchange items should be outlined within the AAUDE guidelines.

Additionally, AAUDE submissions should follow the higher level of security when they combine two or more data sources (i.e., Faculty Profile by CIP and IPEDS Completions).

**Data Quality:** To ensure data quality, AAUDE data users are expected to perform required validity, consistency, and reasonability checks before further use of the data. To ensure data quality, both primary representatives and other approved users are obligated to report any data improprieties with AAUDE caretakers and/or staff in a timely manner.

**Exchange Items with External Rules:** If an exchange item is governed by external rules (e.g., National Survey of Student Engagement), those rules should be explicitly referenced on the exchange item webpage and should be followed in precise detail.

**Purpose of Data and Intended Audiences:** The purpose of confidential data exchanged by AAUDE is to assist in internal decision making at our universities. Some presentations of data may be shared with the campus at large or even on public websites, but confidential data should never be reported to a third party external requester (i.e. newspaper or other periodical) even in summary form.