

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 gathering and exchange of data and information primarily for and among its members, and to continually enhance efficiency and data consistency in collecting and exchanging data. AAUDE values free exchange of timely and accurate information while fully appreciating the privacy and confidentiality requirements involved.

Certain data exchange items are clearly public in nature for which unimpeded use and display of their data are appropriate and should be encouraged. Other exchange items contain sensitive information that exchange participants consider as confidential, in which case the privacy of individuals and the confidentiality of member institutions need to be protected.

To encourage maximum participation in AAUDE data exchanges among member institutions, participants must have confidence that they can rely on AAUDE representatives to follow established data-sharing guidelines and rules during presentation and dissemination of confidential data.

Thus, the overarching goal of this policy is to strike a balance between data access and confidentiality.

Responsibility for Observing Guidelines and Rules

By participating in AAUDE, each member institution agrees to observe confidentiality of all data so designated and to abide by all data-sharing guidelines and rules, including special rules for individual exchange items.

Responsibility for developing and ensuring observance of data-sharing guidelines and policies is vested with the AAUDE Council, the governing body established to develop and implement a strategic plan and coordinate the association's activities.

Primary responsibility for adhering to data-sharing guidelines and rules, and observance of data confidentiality at the institutional membership level is vested with the institutional representatives, especially the primary representative. Stated differently, the primary representative of a member institution is ultimately responsible for ensuring appropriate use and release of information by all people who access AAUDE data at his/her institution.

Further, each representative, whether primary or alternate, and each data user seeking permission to access AAUDE data sources, including its data warehouse, shall be required to sign a Memorandum of Understanding (MOU).

General Data Sharing Guidelines and Rules

“No Submission, No Access” Principle. Access to an exchange item is intended for those member institutions that participate in exchanging data for that item. Institutions that do not provide their own data shall refrain from using any such data. Non-participants in an exchange item may be denied access.

Institutional Legal and Cultural Difference. The legal and cultural frameworks that affect confidentiality of information vary by type of institution. For example, data sharing among public universities tends to be less restrictive than among private universities. Users of AAUDE data sources should be cognizant of such differences and use data accordingly.

Use of Data with Small Number of Cases. Individual identification is possible when a small number of individuals share a single characteristic such as gender, race/ethnicity, disability status, etc., thus breaching confidentiality. In order to prevent tracing of the identity of individuals, AAUDE data users should not report any variable in which there are fewer than **five** individuals in a cell.

Data Quality. To ensure data quality, AAUDE data users are expected to perform the professionally required validity, consistency, and reasonability checks before using information.

Exchange Items with External Rules. If an exchange item is governed by external rules (e.g., NSSE), those rules should be explicitly referenced on the exchange item webpage.

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 not be reported to an external requester even if adequately summarized.

Categories of Exchange Items by Level of Confidentiality

The degree of confidentiality of the many kinds of data shared by AAUDE varies substantially. To balance the need for free, unimpeded use of data with the need for observing confidentiality of data, it makes sense to group exchange items into categories and establish data-sharing guidelines and rules appropriate for each category. The data-sharing guidelines and rules are designed to minimize the potential risk of public disclosure of sensitive data. The four categories of exchange items are:

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

Each existing AAUDE exchange item is placed in one of these four categories depending on the level of confidentiality involved. As a new exchange item is added, the AAUDE Council will evaluate and assign it to the appropriate category.

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 IPEDS system, surveys by the National Science Foundation (NSF) and other data collection agencies such as the AAUP. The publicly reported exchange items are listed in the attachment to this report.*

These exchange items are not subject to AAUDE's specific data-sharing guidelines and confidentiality rules. However, data users 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.

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.

Such 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 guidelines and rules are essential. The confidential exchange items are listed in the attachment to this report.*

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

- a) Use aggregated data (such as mean, median, range) in reports when appropriate and possible.
- b) Use only codes (but not the AAUDE code), and not names of institutions when reporting individual institutional data.
- c) Identify an institution as a member of a known category of institutions comprising a given set of confidential data in a report (for example, public research university, private research university, land-grant university, etc.).
- d) 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.

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.

Note: 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 confidential information increases, the rules on permissible data presentation should be tightened (e.g., requiring the aggregation of data from a minimum number of peer institutions). The following table shows guidelines for acceptable use by audience.

Guidelines for Acceptable Uses 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>
1. Institution's own data	Institutional decision		
2. 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 Coordinator
3. Data aggregated within a peer grouping of at least three institutions and the institutions are identified in the analysis			
4. 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>		
5. Data from institutions that are identified in the analysis/presentation	Use with <i>extreme caution</i>		<i>Not acceptable in any circumstances</i>

4. Confidential Exchange Items with Special Rules

Some AAUDE exchange items contain such sensitive and/or confidential data that they require special rules to govern their dissemination. The confidential exchange items with special rules are listed in the attachment to this report.*

The guidelines and rules listed under Category 3 above also apply to the exchange items in this category (i.e., Category 4). In addition, each exchange item in this category has special rules that must be observed. The webpage of each of these exchange items should be consulted for the specific guidelines and rules that govern the use and dissemination of data from that exchange item.

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

** This statement will eventually be replaced by the web address of the page where the exchange items are listed.*

GT
03/30/2009

ATTACHMENT

Categories of Exchange Items by Level of Confidentiality

1. Publicly Reported Data

- AAUP Faculty Salaries
- IPEDS Fall Enrollment
- IPEDS Completions
- IPEDS Human Resources
- IPEDS Institutional Characteristics
- IPEDS Finance
- NSF R&D Expenditures
- NSF Obligations
- Tuition and Required Fees
- NSF Graduate Student Support
- Honors and Awards
- Annual Financial Report, Organization Charts, and Fact Books

2. Ad Hoc/Special Requests

3. Confidential Exchange Items

- Faculty Profile by CIP
- CUPA Administrative Salaries
- AAUDE Enrollment by Program
- Delaware Teaching Load and Cost Survey
- Graduate Assistant Stipends
- First-time Freshman Profile
- Undergraduate Time-to-Degree
- CSRDE Graduation and Retention Rates
- Current Developments Survey

4. Confidential Exchange Items with Special Rules

- Faculty Salaries by CIP Code
- AAUDE Survey of Faculty Benefits
- Faculty Surveys
- Graduating Senior Survey
- Graduate Student Surveys
- National Survey of Student Engagement
- Alumni Surveys