

Policies related to Confidentiality, Data Sharing and Data Use for Non-AAUDE Users

Overview

To encourage maximal and continued participation in AAUDE data exchanges, institutions that contribute data must have confidence that all who have access the data follow the policies and procedures that govern the presentation and dissemination of confidential data. This document describes the basic restrictions on use and sharing of AAUDE data, whether in raw or summarized form.

Policies on the use of AAUDE data need to be clearly understood by all individuals who have access to AAUDE data. Thus, AAUDE requires that users (1) have access approval from the primary AAUDE representative at their institution (alternative arrangements will be made for those at non-AAUDE institutions) and (2) return the attached signature sheet prior to receiving access or using the data.

Users of AAUDE data are expected to follow confidentiality and data sharing policies and make their best efforts to ensure that these policies are followed on their campuses. Should an AAUDE data user determine that AAUDE data has been misused or released in manner that is inconsistent with AAUDE policy, the data user must immediately report the policy breach to their institution's primary representative as well as the AAUDE Coordinator.

Confidentiality

The data available are considered to be very sensitive and must be treated with extraordinary care. All AAUDE participants and data users agree to keep confidential all data so designated. The only data to which these confidentiality requirements do not apply are those available from National Center for Education Statistics (i.e., IPEDS) and the National Science Foundation.

Because the legal and cultural frameworks vary dramatically among member institutions (especially, but not exclusively, between public and private institutions), audiences are defined primarily in terms of their “willingness and ability to understand and honor AAUDE confidentiality and data sharing policies.” Thus, if Freedom of Information laws governing a particular institution require that data in the possession of a given official is subject to public disclosure, then that official, though able to understand AAUDE sharing policies, is not able to honor them, and sharing of confidential data must be more limited. To be clear, this situation could require a user of AAUDE data to tell a high-ranking university official “I’m sorry. I have access to that data, but according to AAUDE sharing rules I can’t provide you with the detail you’ve requested.”

Data users may seek bilateral permission from a particular university or universities to use their data more freely. This permission may be provided only by the primary AAUDE representative at the institution. Contact the AAUDE Coordinator or check the AAUDE website to obtain necessary contact information.

Data Use

The following are general statements about appropriate uses of AAUDE data.

- The primary purpose of data is to facilitate analyses that support institutional decision-making.
- AAUDE data are **not** to be used for recruitment.
- AAUDE data are **not** to be used to rank participating institutions or other similar public purposes unless there is written agreement of participating institutions.
- 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. This is often referred to as the “no submission, no access” or “don’t give, don’t get” principle.

Data Sharing

Data sharing rules are designed to minimize the potential risk of public disclosure of sensitive data. These rules manage this risk by defining the ways in which data may be presented according to the composition of the audience (see Table 1). Data may be shared at a finer level of detail with the highest ranks of university administration because 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 disclosure of confidential information increases, the rules on permissible data presentation are tightened (e.g., requiring the aggregation of data from a minimum number of peer schools).

It is **not** acceptable to distribute AAUDE data or reports using AAUDE data to audiences outside your own institution without review by and approval of the primary AAUDE representative. For individuals at system offices, "institution" refers to the system office only and does not extend to institutions that are part of the system. This restriction is in place to ensure that AAUDE representatives at campuses in the system are informed about data being distributed on their campus.

Even internal distribution of reports and analyses using AAUDE data must be done with sensitivity to possible repercussions to other participating institutions. Table 1 provides a visual illustration on how summary and analyses of AAUDE data can be used.

General guidelines in preparing reports and analyses of confidential data are listed below. More stringent data sharing rules apply for some exchange items, please check with the primary AAUDE representative at your institution for any item-specific data sharing rules. In the absence of item-specific rules, users should follow these guidelines in preparing reports and analyses of confidential data:

- Use aggregated data (such as mean, median, range) with groups of three or more institutions in reports when appropriate and possible;
- Use only codes when reporting individual institutional data;
- Identify an institution as a member of a known category of institutions comprising a given set of confidential data in a report (e.g., Big Ten or Ivy League);
- When reporting institution-specific data, obtain prior approval from the primary AAUDE representative at an institution before that institution may be identified by name or by any publicly available code (e.g., FICE code);
- Consult the primary AAUDE representative when preparing data or reports for audiences with any risk of public disclosure.

A brief statement acknowledging the source of the data and any restrictions associated with the data should be incorporated into the forward materials of any report and/or presentation that use AAUDE data. The following statement should be used on each page of written reports or presentation materials: "*Confidential – Not for general distribution. Subject to AAUDE sharing policies*".

Table 1. 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.		<i>Not acceptable without review by and approval of primary AAUDE rep</i>
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>

Questions about the appropriate and permissible use of specific data should be directed to the primary AAUDE representative at your institution and/or the National Coordinator.

Consequences of misuse of data

Data users who fail to abide by the AAUDE's confidentiality and data sharing policies may lose access to some or all AAUDE data for a specified period of time deemed proportional to the violation by a review committee and may be referred to their own institution for additional sanctions. AAUDE also reserves the right to limit institutional access to AAUDE as it deems appropriate in cases of data misuse.

Non-AAUDE Data Warehouse Signature and Approval Page

Signature Section: To be completed by the person seeking warehouse access.

Please **initial** each box to indicate you understand the statement.

- I have read and understand AAUDE's confidentiality and data sharing policies.
- I agree to abide by all confidentiality and data sharing rules described in the 'Confidentiality and Data Sharing Policies' and specific to individual exchange items concerning how AAUDE data may be reported and disseminated.
- I agree not to share my login information with anyone.
- I understand that failure to abide by these rules could result in loss of access to these data either for me or for my institution and that my institution may be notified of any inappropriate use.

Please **fill-in** this section legibly and return the form to the primary AAUDE representative at your institution.

Institution _____
Name (printed) _____
Title _____
Mailing address _____

City, State, Zip _____
Phone number _____
Email address _____

Date

Signature

Approval Section: To be completed by the primary AAUDE Representative at the institution.

I approve _____ to receive a login to access the AAUDE warehouse. Please establish an account that provides him/her with access to the following warehouse role (*check only one*).

- ____ **Faculty Profile** (includes Faculty Profile by CIP and IPEDS HR)
- ____ **Grad School** (includes Delaware Study, Faculty Profile by CIP, Graduate Stipends, IPEDS Completions, and NSF R&D)
- ____ **Basic** (includes all data in warehouse except faculty salary and survey data)

Date

Signature (Primary AAUDE Representative)

When both sections are complete, send this page to Rebecca Carr at 208 Canfield Administration Bldg, Lincoln, NE 68588-0420 or fax it to her attention at 402-472-4929. The login information will be sent through US Mail after this signature/approval page has been received and processed.