



Institutional Data Policy

Scope and Responsibility

Colorado State University – Pueblo and the university community require access to institutional data. The university’s institutional data is a valuable asset and must be maintained and protected as such. Furthermore, the privacy of individual information contained in data extracts must be protected by law and by practice to the greatest extent possible. And, it is critical that data be reported consistently in order to ensure a high confidence level in the reliability of the data. Therefore, the purpose of this policy is to help ensure the protection of the university’s institutional data from unauthorized access, damage, alteration or disclosure while preserving the ability of authorized users to access and use institutional data for appropriate university purposes.

Institutional data is defined as all data created, collected, maintained, recorded or managed by the university. It includes data used for planning, managing, operating, controlling, or auditing university functions. It especially includes data used for university reporting. And, for the purposes of this policy, institutional data also includes research data that contains personally-identifiable information but does not include data maintained by the University’s Finance and Administration division.

This policy applies to all individuals and systems that may access institutional data, whether directly or through data feeds.

Members of the university working with or using institutional data in any manner must comply with extant federal, state and local laws; all applicable university policies, procedures and standards; and all applicable contracts and licenses. In particular, users of institutional data must be cognizant of and adhere to federal Family Education Rights and Privacy Act (FERPA) guidelines. All users of institutional data and their supervisors are responsible for complying with the aforementioned laws, policies, and guidelines.

For the purposes of this policy the following roles are defined: The Provost will act as the **Data Trustee** and is responsible for the institutional data management and policy; the Director of Institutional Research will act as the **Data Steward** and has direct operational responsibility for institutional data; heads of operational units that collect and manage various types of institutional data will act as **Data Custodians**; and, any authorized university member who uses institutional data in the conduct of university business is a **Data User**. The Data Steward may delegate or share certain duties pursuant to use of institutional data but maintains ultimate responsibility for its use. CSU – Pueblo has a **Data Advisory Committee** for this purpose comprised of the Director of Institutional Research, the Assistant Vice President for Enrollment Management, and the Chief Information Officer.



All institutional data will be classified as one of the following types: **Public** data intended for broad distribution in support of the university mission and is freely available to any person or organization without restriction; **Limited Access** data which is available without restriction but whose integrity must be carefully maintained; and, **Restricted** data that is protected or regulated by law and may include sensitive personal information. The **Data Steward** will recommend to the **Data Trustee** classifications for all institutional data.

Individuals who violate this policy may be denied access to institutional data and may be subject to other penalties and disciplinary actions.

Policy Statement

Requests for institutional data will generally fall into two categories: (1) routine requests and (2) non-routine requests. Routine requests are those that may be satisfied with report form summaries and are regularly produced by Institutional Research or from pre-written report queries maintained in various university departments such as Admissions, Records, and Student Financial Services. These requests may be approved by the **Data Custodians** from each respective area. Non-routine requests take the form of complex reports or data extracts that cannot be satisfied from pre-written report queries. Non-routine requests may result in raw data, data that spans two or more operational units and data that contains potentially sensitive information. All non-routine requests for institutional data must be reviewed by the **Data Advisory Committee** and be accompanied by a written request clearly defining the data requested, the intended usage of the data, a description of how the data will be stored and protected while it is being used, a description of how the data will be destroyed upon completion, and a description of the time frame the data will be maintained. The request must include an approval of the user's supervisor. The Data Steward will develop appropriate data request forms for the university that includes a statement acknowledging an understanding of extant laws, policies, and guidelines for appropriate data usage.

Requests for non-routine institutional data that do not include the aforementioned descriptions or supervisor approval will be denied. Appeals of requests denied by the **Data Advisory Committee** must be addressed to the **Data Trustee** (Provost), and include a statement of why a required element of the request was not provided or why this policy does not apply.



Institutional Data Request Form

Name: _____ Date: _____

Institution/Department: _____

Specific Information Requested: _____

Reason for Request: _____

Intended usage of the data: _____

Please describe how data will be stored and protected: _____

Please describe how long will the data be maintained: _____

Please describe how data will be destroyed after completion: _____

(Signature) Applicant

(Signature) Directors/Deans

(Office Use Only)

Data Classification: Public data Limited Access data Restricted data

Request Category: Routine request Non-Routine request

Recommended

Not recommended

Dir. Institutional Research/Data Advisory Committee

Data request approved

Data request disapproved

(Signature) Provost

Denied reasons: _____