

# **Data Policy and Standards for Managing and Using Institutional Data**

## **Purpose**

Institutional data are owned and managed by Tarrant County College District (TCCD) (herein “College”). Data are a valuable asset collected in many offices and departments under operational and academic auspices. Data usage range from transactional purposes for planning, auditing, and managing College operations to reporting purposes for compliance, process improvement, and research. Within these data, elements can contain Personally Identifiable Information (PII) of students, faculty, and staff and proprietary College information pertaining to operations, recruitment, patents, and so forth. The purpose of this policy is to help ensure the College’s institutional data are accessible to authorized and qualified users for appropriate purposes, data are not misused or altered, and the release of data conforms to all pertinent laws and statutes. This policy applies to all institutional data, and all users of these data must comply to its stipulations regardless of affiliation or locations from which resources are accessed.

## **Policy Statement**

As a member of the Association of Institutional Researchers (AIR), the Office of Institutional Research (IR) at TCCD has a responsibility to uphold the integrity of the profession. Thus, the institutional researcher should work towards the maintenance and promotion of high standards of practice by upholding and advancing the values, ethics, knowledge, and mission of the profession.

1. If you work with institutional data at TCCD, you are responsible for meeting the College’s official data management standards to prevent inappropriate disclosures of personal or confidential information.
2. College administration is responsible for identifying authorized users and may limit the distribution of institutional data at its discretion.
3. The permission to access institutional data may be granted to all eligible employees and designated appointees of the College for all legitimate college purposes.
4. TCCD employees and its designated agents must comply with all federal, State of Texas, and all other applicable laws such as HIPAA (Health Insurance Portability and Accountability Act) and TCCD’s Acceptable Use Guidelines.
5. Users of institutional data must access data only in their conduct of college business and in ways consistent with furthering the College’s mission of education, research, and public service.

6. Users of institutional data must not disclose data to others except as required by their job responsibilities, use data for their own or others' personal gain or profit, or access data to satisfy personal curiosity.

### **Requesting Data Process**

1. All requestors shall first review available resources ([IR website](#), Orbit, Colleague, etc.). It is possible answers to questions may be found in these materials.
2. If these sources do not contain the necessary data, requestors can submit a data request using the Data Request System (DRS) located in the [TCC Service Center](#).
3. If a previous data request fulfills the needs of the new request, the requestor will be sent a copy of the previous analysis to expedite the needs of the requestor.
4. If IR is not the data steward of the requested data, the requestor will be directed to the proper department in order to fulfill the request.
5. Based on specific request details, the manner in which data are presented or a data request is structured may need to be altered by IR analysts/directors in order to uphold the standards of integrity in the profession and ensure accuracy in TCCD data reports.
6. While every effort will be made to assist in the fulfillment of the requestor's data needs, instances exist where requested institutional data may not be available or may not be released.

### **Denials of Requests**

The Executive Director of IR, Research Analysts, or other Directors in IR assigned to a data request must provide a written record of the reasons for denial of any request. E-mail records are acceptable. Reasons for denial might include, but are not limited to:

- a. Data are already available in existing reports.
- b. Request pertains to information on individual students, faculty or staff, especially concerning violations of the Family Educational Rights and Privacy Act (FERPA).
- c. If the information is for publication, data on extremely small populations that may reveal student identity will not be released. Coded identifiers will be utilized to conceal student identity.

- d. Data are outside the mandate of IR (e.g., financial statements, Human Resources, Financial Aid).
- e. Data are not available, not collected, or are from an unreliable source.
- f. Data reside with a third party (data on other schools, etc.).
- g. Collection of data would consume an inordinate level of available resources (e.g., major projects for which dedicated resources would normally be required).
- h. Collection of data requested are not of direct benefit to the planning processes of the institution.
- i. Request is from external individuals for their specific research (or other) purposes (e.g. graduate students).
- j. Data requested are the wrong data to address the research question or reporting need.
- k. The statistical analysis requested is inappropriate, or the request is made with the intent to make overreaching statements (i.e., causality, generalizability).
- l. If coding, definitions, or methodology have changed substantially enough to render an exact replica of an old report with new data unusable. Such requests may be fulfilled with recent data that are more applicable.
- m. Questions regarding internal ad-hoc requests completed more than two years prior may be unanswerable.
- n. Release of data would be unethical based on scientific rigor and merit.

### **Data Sharing Agreements, Institutional Review Board, Student Directory Information, Open Records Requests**

Data requests may come from outside of the institution, and various paths and procedures are in effect to address such requests and queries.

## **Data Sharing Agreements**

Data sharing agreements (DSA) allow release of certain Personally Identifiable Information (PII) between TCCD and another institution of higher education or contractual entity within strict legal guidelines and are usually accompanying an executed contract or Memorandums of Understanding (MOU). Details about these agreements may be found in TCCD's *"A Guide to the Proper Execution and Authorization of Memorandums of Understanding, Data Sharing Agreements and Statements of Work"*.

## **Institutional Review Board Requests to Conduct Research at TCCD**

The Institutional Review Board (IRB) is a board set up under the Health and Human Services (HHS) Office of Human Research Protection (OHRP). Federal regulations (45CFR46) give the IRB the authority to review research involving human subjects.

At TCCD, this most often involves a request to engage in research in certain student populations.

The IRB is guided by the limitations of the student directory information, legal guidelines (FERPA, HIPAA), and ethical guidelines (Belmont Report, Common Rule).

Researchers must have IRB approval prior to recruiting study subjects on any and all campuses.

Informed consent forms, requests for student's permission to participate in a study and/or for permission for the release of non-directory information must conform to the Belmont Principle of Respect for Persons. Informed Consent guidelines and checklists may be found on the TCCD [IRB website](#).

The IRB has not only the right but also the responsibility to review the design of the research, its scientific merit, and the qualifications of the researcher to engage in the proposed research.

## **Student Directory Information**

Release of student information is governed by FERPA. Only what is deemed directory information may be released upon request to the Office of Records & Reports under the department of Admissions and Records. Cost to the requestor is \$150 to fulfill each request, if the requestor is not another institution of higher education or an agency with a legitimate educational interest.

Student directory information may only be released if the student has not opted-out of release of directory information. Examples of what is not directory information are GPA, email addresses, enrollment verification, transcripts, and phone numbers.

The official policy on Access to Student Records may be found in the current TCCD [Catalog](#) under “General Regulations.”

Generally, non-directory information is never released without the student’s official authorization.

### **Open Records Requests**

Requests for information under the Texas Public Information Act should be directed to the Office of General Counsel, Tarrant County College District. Attention: Keith Whetstone, 300 Trinity Campus Circle, Fort Worth, Texas 76102. Open Records Request inquiries can also be made by phone (817-515-5444) or email ([records@tccd.edu](mailto:records@tccd.edu)).