

Office of Institutional Research Student Data Policy

Effective December 2024

Purpose:

To strengthen student protection consistent with the mission and values of Lehman College.

Statement of Policy:

Lehman College is committed to "advancing equity, inclusion, and social justice." Social justice, diversity, and inclusion are infused in its longstanding institutional values. This mission and the underlying values are non-negotiable and shall not be compromised.

Student data access and availability impacts the integrity of Lehman's mission and values. The Office of Institutional Research (OIR) adopts this student data policy to protect the access and wellbeing of Lehman's diverse student population.

Policies and Procedures:

Student Data Policy:

Introduction:

The Family Educational Rights and Privacy Act (FERPA) safeguards the privacy of student education records. It grants parents and eligible students the right to access, review, and request amendments to these records, while also restricting unauthorized disclosure of personally identifiable information. FERPA ensures that educational institutions maintain strict controls over data sharing, emphasizing the importance of consent and transparency in handling student information. This law reflects a commitment to protecting individual privacy within the educational environment, fostering trust between students, parents, and educational institutions.

General Policy on Student Data Disclosure:

- Data will be provided in de-identified form to internal and external stakeholders
- Data will be provided on external stakeholders on a "need-to-know" basis
- Disaggregated data will be provided only for categories with 5 or more students to minimize the risk that individual student identity could be compromised
- All data posted on the OIR website, interactive Fact Book, or any other channel by which OIR disseminates data will be in de-identified form

Disclosure of Student Data related to Undocumented Students:

- No data in any form shall be provided to any internal or external stakeholder for any use
- No data in any form shall be posted on the OIR website, interactive Fact Book, or any other channel by which OIR disseminates data

Third-Party Relationships:

- Data will be provided as set forth in the *General Policy on Student Data Disclosure*
- Third Parties will need to disclose their data protection policies and/or data controls, especially for cloud-based services
- OIR would provide data only after OIR has received the relevant documentation expected from third parties
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Data Breaches:

- OIR would notify students of any data breaches, including the nature and extent of the breach, using the Student email list
- OIR would notify key institutional stakeholders of any data breaches, including the nature and extent of the breach and any steps to mitigate the impact, using the Faculty/Staff email list

Definitions:

Data Breach: An incident where protected information is disclosed or accessed.

Data Control: The management of data to ensure its quality, security, and privacy. The control provides policies, procedures, and practices to safeguard sensitive data from leaks or breaches.

Data Protection Policy: A policy used by an organization to protect personal data. The policy outlines how an organization collects, stores, processes, and shares data. The policy explains the rights of people whose data is being handled.

De-identified Data: Data for which personally identifiable information has been removed to protect the privacy of individuals such as students.

Disaggregated Data: Data that has been broken down into smaller or more specific categories to reveal patterns and/or trends.

External Stakeholder: Any person (including parents, alumni, or donors), organization, body, or entity outside of Lehman College

Internal Stakeholder: Any person (faculty, staff, administrator, or student), office, department, academic program, school, or other entity within Lehman College

Need-to-Know Basis: Data for which a party has a legitimate interest in receiving. For example, a grantmaking organization would have a need to know how a targeted student population is faring in an academic program

Protected Information: Refers to data that is safeguarded by law, regulation, CUNY policy, Lehman policy, or OIR policy.

Third Party: Any entity, institution, or organization that has a contract or written agreement with Lehman College to provide services to Lehman College or administer, through either manual or automated processing, any aspect of Lehman's participation in any Title IV, Higher Education Act (HEA) program.