Introduction
The Guidelines for Institutional Research (GIR) provides information on the proper access, protection, use, and dissemination of data at Grossmont-Cuyamaca Community College District. Four principles of data sensitivity are identified: Data Access, Data Security, Use of Data, and Dissemination of Data. Three levels of data sensitivity, Level I, Level II, and Level III, are defined for each principle. The magnitude of data sensitivity is directly related to the scale used for the levels. Moving from one level up to another denotes a significant increase in the data’s sensitivity as described in the “Terms and Definitions” section.

Terms and Definitions
The following terms and definitions are provided in order to establish a shared understanding of the underlying concepts concerning data sensitivity.

Data Sensitivity: the extent to which data should be protected, based on the nature and content of the data
  Level I: public information which is highly aggregated, or broadly categorized, such as enrollment figures, transfer rates, or any other institution-wide data
  Level II: General requests for research reports, survey data, and data that are disaggregated, or broken out by categories, to some extent, such as success rates or student progress at the program level
  Level III: Special requests for research reports and sensitive information that is highly disaggregated, such as student contact information, data at the course number level, student records, and all personally identifiable information

Data Specificity: a continuum along which data may be generalized to broad groups or specified to smaller units

Aggregate Data: data expressed as total summaries that encompass multiple groups or units within broad categories, i.e., Level I data

Disaggregated Data: data that are broken out by categories or units, i.e. Level II data or Level III data if the unit of division are individual students, staff, or faculty members such that the information is personally identifiable

Family Educational Rights Privacy Act (FERPA): a Federal law that prohibits the release of student records (verbally, in writing, or by any other means) without the written consent of the student or a court order or a lawfully issued subpoena, unless there is a specific statutory authorization or a legitimate educational interest or need to know, a need to know as part of fulfilling their job duties, or an emergency

Internet: a world-wide network of computer networks

Intranet: an internal, private network that can only be accessed within the confines of an enterprise, e.g., the Grossmont-Cuyamaca Community College Intranet

Research Data and Project Request Form: GCCCD for used to request data and/or research

http://www.gcccd.edu/research/IR_Project_Request_Form.pdf

Level III Guidelines for Institutional Research (GIR) Statement of Responsibility

I, _______________________________ have read the Guidelines for Institutional Research (GIR), pages 1 and 2 of this document, in its entirety. I accept the responsibility of protecting the security of data to which I am granted access. I hereby agree to comply with all of the principles, instructions, and regulations related to data access, confidentiality and security, use, and dissemination that are set forth in this document.

[Signature] __________________________ District E-mail] __________________________ [Date] _____________
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<td><strong>LEVEL I</strong>: In order to provide access to all, these data are posted on the District (GCCCD) web site [<a href="http://www.gcccd.edu/research/">http://www.gcccd.edu/research/</a>]. If a requestor of research would like access to Level I data that are not already available, the requestor should complete a Research Data and Project Request Form and follow the protocol delineated in the section below under Level II data. <strong>LEVEL II</strong>: These data are posted on two password-protected sites. Colleague Reports can be accessed from on-campus computers and require a GCCCD login. Cal-PASS SMART Tool data can be accessed from any computer with internet access and requires a MyCalPASS login. For access to data that is not already available, individuals must complete a Research Data and Project Request Form available on the Research, Planning and Institutional Effectiveness (RPIE) website at <a href="http://www.gcccd.edu/research/IR_Project_Request_Form.pdf">http://www.gcccd.edu/research/IR_Project_Request_Form.pdf</a>. Requests will be processed upon the signed approval by the requestor's Dean and Vice President. Deans and Vice Presidents are responsible for ensuring that data are being requested on a legitimate need-to-know basis. Requestors who are new to the process may meet with an RPIE representative. Although the requestor may specify a project timeline, prioritization of research requests shall be left to the discretion of the RPIE Office. <strong>LEVEL III</strong>: Requesters must complete a Research Data and Project Request Form. Access will be granted on a need to know basis. Individuals who wish to gain access are required to read, print, and sign the GIR Statement of Responsibility. Individuals who are granted access to Level III data shall be ethically bound to the GIR. In the event that the data requested are not deemed “need-to-know”, the data request shall be fulfilled at a more aggregated and appropriate level of data sensitivity.</td>
<td><strong>LEVEL I</strong>: Data reports will be available in multiple formats. <strong>LEVEL II</strong>: Access shall be password protected. <strong>LEVEL III</strong>: Access shall be password protected. Passwords will be given to individuals on a need-to-know basis. Data users shall take all precautions necessary to prevent disclosure of highly sensitive data to individuals who have not been granted access. Individuals who do not have or have been denied access shall under no circumstances seek to procure or view sensitive data. Failure to comply with these precautions and restrictions shall result in temporary suspension of access rights and disciplinary action as defined by Federal and State laws. Data users shall take care to: (1) Protect the confidentiality of usernames and passwords (2) Log off or sign out after visiting a password-protected Intranet or Internet site (3) Avoid creating databases or applications that use SSN as identifiers (4) Protect printed sensitive data by storing in a locked desk, drawer, or cabinet and never leaving unattended on desk, copier, FAX or printer (5) Dispose of sensitive data by shredding or returning to the Research, Planning, and Institutional Effectiveness Office (6) Physically protect devices that can be easily moved, such as PDAs, laptops, and portable storage devices, e.g., memory sticks.</td>
<td><strong>LEVELS I, II, and III</strong>: Data will be: (1) fairly and lawfully processed (2) processed for limited purposes (3) adequate, relevant and not excessive (4) accurate (5) not kept for longer than is necessary (6) processed in line with the data subject's rights (7) handled with utmost concern for data security. All aspects of research, including formulation of the research question, sample selection, choice of variables, and methodology, should be carefully thought out and planned by data users. Data users should ensure data integrity, execute analyses with precision, and interpret findings accurately in a clear, understandable manner. Special attention should be given to data definitions and interpretations of findings.</td>
<td><strong>LEVEL I</strong>: Data reports will be available in multiple formats. <strong>LEVELS II and III</strong>: The designated researcher in Research, Planning, and Institutional Effectiveness Office shall disseminate data as deemed appropriate to approved requestors who follow the protocol for submitting a Research Data and Project Request Form. Data will be disseminated in an appropriate context. Proprietary data shall be disseminated only with permission from the stewards of those data. Individuals are obligated to respect all copyright laws. Reproductions of data reports should have all original titles, footnotes, and supplemental information intact and unaltered. <strong>LEVEL III</strong>: Data will be disseminated by the RPIE Office on a need-to-know basis only to approved requestors who print and sign the GIR Statement of Responsibility and have an approved Research Data and Project Request Form on file in the RPIE Office. All Level III data that are disseminated by the RPIE Office will be considered confidential, and issues related to confidentiality will be discussed with requestors. Reproductions and unauthorized dissemination of Level III data are prohibited.</td>
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