Proposal for data management of BIO/Demographic applicant & student data

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Summary / Background

UW-Madison collects general demographic information about the applicants that apply for admission and the students that do enroll at our institution. However, today we currently collect that information in a variety of methods and not all of those methods are consistent with good data management principles. Several recent incidences have highlighted the degree to which UW-Madison is out of compliance with expected data practices. Since we have an institutional responsibility to report on some of the demographics of our applicants and students, and a need for this information for key operations, a small sub-team of cross-institutional staff sponsored by the Vice Provost for Enrollment Management and the University Registrar has undertaken an effort to create a management plan to better manage specific pieces of information of our applicants and students.

In addition to the reporting requirements we have certain pieces of demographic information, we also collect information that hopefully would both provide applicants with a feeling of inclusivity as well as indicate to us a need for various campus student services. These pieces of information were also included as part of this data management plan.

The following pieces of demographic information are included within the overall scope of this management plan:

- Race / Ethnicity
- Sex assigned at birth
- Citizenship status
- Country of citizenship
- Veteran status
- Visa type
- Gender Identify
- Pronoun
- Preferred Name
While the plan details the overall strategy of managing these data elements, there are three key requirements to be made clear as we implement the vision laid out in this document:

1. UW-Madison is federally required to report on Race/Ethnicity information of our students. In order to meet this requirement, we may choose to implement an immediate solution for race/ethnicity information prior to implementing the rest of the plan for the other elements within its scope.

2. These pieces of information, while collected in a distributed fashion across departments, must be transmitted to some central location so they are all combined and stored in one place. This central location may be the Student Information System in the short term until a master data repository is operational.

3. While this plan is focused on elements of applicant / student data, the overall architecture does take into account a longer term vision for the management of identities of people associated with UW-Madison. The goal is that for those that are both students and employees (as an example) we collect and manage these (and potentially others) pieces of information consistently, not in separate silos (student vs hr.)

If this plan is approved by the Data Governance Steering Committee, resources will need to be allocated in order to implement parts of the solution outlined by this plan.
Plan

The following diagram depicts the data management lifecycle we think about when managing institutional data. We used this diagram as a basis for determining how we would go through the analysis of and formulate the recommendation contained below.

Collect/Create

*Gender Identity, Pronoun and Preferred Name*

Because we currently collect Gender ID information on multiple admissions applications, and because we think having this information institutionally would greatly benefit and enhance the services we can provide our students, we believe this information should be collected at the time of application. It should not be required that a student provides information, but students should be given the opportunity to identify if they so choose.

Collecting the information in a consistent manner is paramount. The UW-System undergraduate application for admissions asks for Gender Identity information and the group believed the manner in
which that data is collected would be sufficient. We should also allow the applicants the opportunity to provide a preferred name and pronoun at the same time.

Students should be allowed to change this information whenever they so choose. Students should be able to log into MyUW and provide this information or change this information.

There are other places / departments at UW-Madison that potentially collect this information. University Housing, University Health Services, Rec Sports are some of those. Over time, we would expect that those departments consume the institutionally collected information and not collect it separately. Separate IT systems, budgets and resources may prohibit this from happening in the short term. However, we would suggest that communication between those departments that do collect similar information and the students with whom they interact include the notion that just because that department is collecting the information does not mean UW-Madison the institution is collecting that information. In order for the institution to collect it in a consistent manner, the student must submit the information through the above channels.

While we should collect this information consistently across campus, not all of campus needs to have access to all of this information. If a student choose to submit a preferred name or a pronoun, we believe there is an expectation that UW-Madison uses that information when communicating with the student. However, knowing whether or not a student identified gender other than ‘sex assigned at birth’ is not information that all people across campus need to / should know. With all 3 of these pieces of information about a student, we should be educating UW-Madison faculty, staff and administrators on why we are collecting this information, what it means to have access to this information and how we might use the information in order to better make students feel welcomed / accepted by our institution.

**BIO Demographic Information**

The work-team discussing this topic first had to decide what elements / pieces of information should be included as part of the scope of this effort. We decided to limit the scope to those pieces of information that we need to report out to external institutions / agencies (i.e. UW-System, State of Wisconsin, Federal Department of Education, etc.) Those elements include:

- Race / Ethnicity
- Sex assigned at birth
- Citizenship status
- Country of citizenship
- Veteran status
- Visa type

UW-Madison should collect this information at the time of application for admission to the university. The first four elements are mandatory to collect for ALL UW-Madison applicants. If a student’s country of citizenship is not the United States, we need to document that information as we further need to collect Permanent Residency status or visa type for non-US citizens. Some individuals will report visa types that do not require the university to issue documentation for the purposes of study. Others will need to request F-1 or J-1 visa sponsorship to study; country of citizenship is required to issue student
visa documentation. Knowing whether an applicant has served or is currently serving in the military not only needs to be reported externally but also would help us provide services to that student.

All of the values for these data elements, at the time they are collected, should override any other values that may have already been collected previously. We do not intend to store history of these pieces of information, only the most recent known values.

Describe/Document

Gender Identity, Pronoun and Preferred Name
Because of the personal and possibly sensitive nature of the information being collected, and because we want to be inclusive to all of our students, how we phrase the questions to collect these pieces of information is important.

Gender Identity: “Choose any that apply”

- Man
- Woman
- Trans or Transgender
- A gender ID not listed
- Prefer not to answer

Pronoun
We are proposing that we collect pronouns from our applicants/students if they so choose to provide them.

Please indicate what pronouns you use (optional)
He/him/his
She/her/hers
They/them/their
Ze/ hir
Other (fill in the blank)

BIO Demographic Information

Race / Ethnicity
The federal government has mandated the format of the two questions about race/ethnicity as well as allowable values. UW System and the Board of Regents has further defined required subcategories of Hispanic ethnicity and Asian race that we must collect and report. Therefore, we will ask the question in the same manner that the UW-System application asks the question. The idea to make sure we get across to the applicants is that we are collecting this information because of federal & state reporting
requirements and that we are not collecting this information to aid at all in the admissions process. The question(s) are asked in the following manner:

Racial/Ethnic Heritage: You are not required to disclose your racial/ethnic heritage. However, you are strongly encouraged to do so. Your response to this question will help the UW System meet federal reporting requirements. Your response may also assist in identifying opportunities and awarding scholarships and financial aid.

Are you of Hispanic or Latino origin? (Y/N) If yes, choose one or more from the following list:
- Cuban
- Mexican, Mexican American or Chicano
- Puerto Rican
- Other Hispanic or Latino

Choose one or more from the list below:
- African American or Black
- American Indian or Alaskan Native (specify tribal affiliation ______________)
- Native Hawaiian / Pacific Islander
- Asian
  - Cambodian
  - Hmong
  - Laotian
  - Vietnamese
  - Other Asian
- White

Sex Assigned at Birth
Applicants must answer this and their choices are Male/Female. The question reads: “For state and federal reporting purposes, please provide:”

Citizenship Status
The values we need for reporting and the delivery of student services and residency information are:

Are you a US Citizen? Y/N. If not please check one:
- Refugee / Granted Political Asylum
- Permanent Resident (Provide Permanent Resident Number __________)
- Visa Holder: Give Visa Type (F1, J1, other)
  - I intend to request a Student Visa (F1, J1)
  - None of the above
**Country of Citizenship**
Today, the UW-System application allows an applicant to free-form enter any value they wish onto the application. Long-term, we would want to provide the applicant with a list of countries from which he/she could select. This list should come from the ISS/RO offices.

We will need to develop a process to map the value an applicant enters into the application to one of our standard values.

**Veteran Status**
Have you and/or a parent/spouse served in the US military?

Y/N
If Yes – check all that apply
   Self
   Parent
   Spouse

**Analyze / Process**

In order to take the data from multiple admissions applications and combine all the data for the institution to manage and utilize efficiently, we will need to either modify or develop integration routines. Our long term architectural diagram looks like something similar to the below:
Achieving this long term vision may not be able to happen immediately due to resource constraints. However, what will need to happen immediately is that data from the various admissions applications needs to be transmitted to some central location so it is all combined and stored in one place. The requirements for the format of how that data is transmitted and the integration standards are to be developed as part of this process.

Publish / Share

We are recommending that the University Registrar and the Director of International Student Services are the Stewards & Custodians of the following:

- Citizenship Status
- Country of Citizenship
- Veteran Status

The University Registrar should be the Steward & Custodian of the other pieces of information included within the scope of this document.

As Stewards of these pieces of information, the University Registrar and the Director of International Student Services are responsible for monitoring the quality of the data. Any integration routines that are developed should be fully tested by the Stewards or their designees. The Stewards and Custodians are responsible for ensuring that business processes that transact with or manipulate these data elements are defined and followed accordingly.
The Stewards of these pieces of information will report, on a yearly basis, back to the Data Stewardship Council the following:

- #,% of applicants / students that have / have not identified a Gender other than sex assigned at birth
- #,% of applicants / students that have submitted a preferred name
- #, % of applicants / students that have NOT identified a race / ethnicity
- # of data quality issues that have been either technically or manually resolved (on a monthly basis)

The group is recommending that for the pieces of information that have been described as BIO/Demographic information within this document, there shouldn’t be any additional restrictions beyond existing University policy as to who should have access.

For Preferred Name and Pronoun, the group recommends that if Faculty and Advisors have access to the information under existing University Policy, they should also have training around what their individual responsibilities are by having access and how they should or should not use these pieces of information.

For Gender Identity, the following groups / roles only the following groups / roles should have access.

- LGBT Center
- Housing
- Rec Sports
- Athletics
- UHS
- CFYE
- RO
- McBurney Center
- UWPD
- Dean of Students

We are also recommending that an educational component is included within the overall data management plan related to both why we collect the pieces of information we are collecting and maybe more importantly how one would appropriately use or not use certain pieces of the information contained within the scope of this plan.

**Retain / Destroy**

These pieces of information about an applicant (and then possibly a student) would follow existing record retention schedules for applicants and students. There is no need for additional requirements around the retention / destruction of these elements separately.