

D2L & Moodle Retirement Data Management Plan

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Executive Summary:

- How long will data in Moodle and D2L be available for emergency/critical situations following service retirement?
 - Data in D2L and Moodle will be retained for approximately 6 months following their respective retirement dates. This timeline will allow undergraduate incompletes to be fulfilled prior to the data no longer being accessible.
- Who will have access to Moodle and D2L data for the retention period following a service's retirement date?
 - Following official service retirement dates only campus administrators will have access to Moodle and D2L data.
- What type of content is included in this plan?
 - This plan covers all content that exists within D2L or Moodle for UW Madison, including course content, faculty or student generated content, gradebooks, submitted assignments, etc.
- Who will be responsible for data that is needed longer?
 - This plan maintains the same data stewardship responsibilities as the current policy in that the offices of record for any additional data retention needs would continue to reside with the School/College Programs and Graduate School and Graduate Program Offices Campus-wide

Full D2L & Moodle Retirement Data Management Plan

Data Retention Recommendation:

It is recommended that data stored in the D2L and Moodle learning management systems at the University of Wisconsin - Madison be retained for approximately 6 months following the "retirement dates" of these services. For this purpose the "retirement date" is the date that the system is no longer accessible to general users of the University.

During the 6 month data retention period following a service's retirement date only a small number of system administrators will have access to the system data. Following the 6 month period the retained data will be destroyed.

An example timeline would be the retirement of D2L at the end of the Spring 2018 semester. Data from that service will be retained until approximately December 2018, with only a limited number of administrators (where data access requests can be sent). Only these administrators would have access to the data before it is destroyed.

Reasoning for Recommendation:

The rationale for this recommendation is to balance the possible data needs of campus with the cost of storing and retaining access to the historical LMS data. Due to the large ongoing cost associated with D2L licensing fees, and the minimal benefit to campus to retaining the data in question, the shortest reasonable duration identified was 6 months in order to fulfill the most likely undergraduate incomplete policy (included below) use case.

Policy governing undergraduate incompletes:

“Any subject taken by an undergraduate student in the College of Letters and Science marked Incomplete must be completed by the end of the fourth week of classes of the student's next semester of residence at the University (exclusive of summer sessions) or it will lapse into a Failure. If an instructor grants an extended incomplete, a grade change will need to be filed by the instructor, approved by the chairperson of the department, and forwarded to the Dean's Office. In such cases the grade of I or IN is replaced with the grade of EI. Any subject taken by undergraduates in other colleges must be completed by the end of the student's next semester in residence (exclusive of summer sessions).” (From the Grades and Grading Policy, Registrar's Office: <https://registrar.wisc.edu/incompletes.htm>)

Another main consideration was the potential usefulness of the data in question for future projects. Campus groups, most specifically the Learning Analytics Roadmap Committee (LARC), were consulted in regards to the usefulness of the historical LMS data for future analytics or Big Data projects. All consulted, once they understood the type and contextual nature of the data, agreed that it would not likely be useful moving forward, and it was acceptable for it to be destroyed following the proposed retention period of 6 months.

Lastly, there was the consideration of any School or College specific federal compliance or accreditation needs. The College of Engineering, School of Business, School of Veterinary Medicine, School of Pharmacy, and School of Education were all met with individually and raised no significant concerns to the proposed plan.

Impacted Data Types:

This plan covers all content that exists within D2L or Moodle for UW Madison, including course content, faculty or student generated content, gradebooks, submitted assignments, etc. Nothing will be available from the LMS services past their retention period.

Scope of Data Management Plan:

This data management plan covers all data housed within the Moodle and D2L systems. It does NOT cover data housed within the Canvas system, or in other tools that may have been leveraged through the Moodle and/or D2L systems.

Stakeholders impacted:

Any faculty, staff, or student member involved in using or supporting the the D2L or Moodle services will be impacted by this data plan. People who administer, own, or support courses within D2L and/or Moodle will be impacted the most. Students taking active courses will likely not be impacted at all.

There was a concern that some schools' and colleges' individual accreditation or compliance needs may not be met by this plan so they were met with individually. In addition to the opportunities for feedback listed below the College of Engineering, School of Business, School of Veterinary Medicine, School of Pharmacy, and School of Education were all met with individually and raised no significant concerns to the proposed plan.

In order to address any needs or concerns of the stakeholders the following groups were given opportunity to provide feedback on this plan. None raised any significant objections.

- Data Stewardship Council
- Teaching and Learning Technology Advisory Group (TLTAG)
- Learn@UW Executive Committee
- Graduate Faculty Executive Committee (GFEC)
- University Council on Academic Affairs and Assessment (UCAAA)
- University Committee (UC)
- Instructional Technology Group (ITG)
- Learning Analytics Roadmap Committee (LARC)

Compliance considerations:

According to the [UW-Madison Records Retention and Disposition Schedule for Undergraduate and Career Graduate Student Records and other Student Related Records](#), dated 2015, we are obligated to retain for a period of five years beyond when the record was created the "Examinations, coursework, assignments, etc. as retained by academic departments to serve as source documents for submitted official grades. This series includes course support instructional materials in any format including those found in course management systems, such as Desire2Learn (D2L) and online courses. Does not include Syllabi." The office of record as listed in the Schedule would be the school or college programs themselves and graduate school and graduate program offices campus wide (Record Series ID UWUGS901).

One of the main purposes for retaining such data is to comply with open records law, as stipulated by the Schedule. According to Lisa Hull, the Public Records Custodian in the Office of Compliance, there has only been two requests for D2L data since 2012, both from students. Therefore it would appear that the risk is low if the records in question were not retained for the full five years. Through personal communication with the Office of Legal Affairs, we were also advised that the benefit-to-risk ratio was acceptable if there was no longer access to the D2L and Moodle LMS platforms six months after the last semester taught using either one.

Data Stewards and responsibilities:

Following official service retirement dates only campus administrators will have access to Moodle and D2L data. This means that all known needed data must be removed from the systems PRIOR to the retention period. During the retention period (for D2L from the end of the Spring 17-18 semester until December 2018) only campus administrators will be able to retrieve data.

This plan maintains the same data stewardship responsibilities, as listed in the Records and Disposition Schedule, in that the offices of record for any additional data retention needs would continue to reside with the appropriate "School/College Programs and Graduate School and Graduate Program Offices Campus-wide" ([Record Series ID UWUGS901](#)).

Communication Strategies:

Communicating the data retention plan, and related stewardship responsibilities is a critical component of successfully transitioning the University to a new learning management system; as such it is being considered a sub-project of that endeavor.

The expectations that have been set with campus are that timely email communications will be sent to faculty and SCIDDs that will include steps for recommended ways to download and store any data they feel is needed. In addition to these email communications campus governance groups that were identified as stakeholders will also be informed.