

BOARD OF REGENTS
BRIEFING PAPER
Handbook Revision: Data Confidentiality and the Universal ID

BACKGROUND & POLICY CONTEXT OF ISSUE:

Through the iNtegrate project, Peoplesoft implementation across NSHE provides an opportunity to improve services to students and improve reporting capabilities. The implementation also requires institutional collaboration to make common business practices and data elements that were previously institution-specific. As a result of new and changing business practices and opportunities for service and reporting improvements staff recommends the adoption of a policy concerning data confidentiality and the use and maintenance of a universal student/employee ID.

SPECIFIC ACTIONS BEING RECOMMENDED OR REQUESTED:

1. Amend Board policy to provide that access to student and employee data for the purpose of conducting NSHE business is authorized while maintaining confidentiality of that data (*Title 4, Chapter 21, new Section 3*). Through all aspects of the Peoplesoft implementation it is important to stress the confidentiality and privacy of student and employee data that are necessary to conduct NSHE business.
2. Amend Board policy to establish the universal identification number (UID) (*Title 4, Chapter 21, new Section 4*). The UID supports the ability to track and report on students as they progress through multiple institutions as well as provide them with one identification number that will follow them through all institutions. The policy includes the data elements that will be maintained as part of the UID. The UID will allow for data such as student contact information to be updated at all institutions when updated at one institution.
3. Adopt procedures regarding the specific documentation required for changing data elements included in the UID (*Procedures and Guidelines Manual, Chapter 6, Section 7*) (See the attached Policy Proposals.)

IMPETUS (WHY NOW?):

As the Peoplesoft implementation progresses business practices and procedures are being reviewed to ensure project success, efficiency for the institutions, improved services for the students, and improved capabilities to conduct research across the system that will lead to improved policies and student success. The policies and procedures included in this request will help to accomplish these goals.

BULLET POINTS TO SUPPORT REQUEST/RECOMMENDATION:

- The UID will allow students to have ONE identification number at all institutions. It will also allow for improved reporting on students who attend multiple NSHE institutions.
- Access to student and employee data is necessary to facilitate the Peoplesoft implementation effectively, but must be done in a confidential manner to protect students and employees.

POTENTIAL ARGUMENTS AGAINST THE REQUEST/RECOMMENDATION:

- The individual institutions cannot change student data included in the UID without following defined procedures.
- Student and employee data should not be shared across NSHE institutions (sharing of student and employee data is necessary for the UID as currently structured).
- Employees should not have access to student or employee records of NSHE institutions other than their own.

ALTERNATIVE(S) TO WHAT IS BEING REQUESTED/RECOMMENDED:

- Do not issue a universal identification number to students and employees of NSHE.
- Abide by existing policy that ensures privacy of student and employee records but does not facilitate implementation of Peoplesoft and functionality such as the UID.

COMPLIANCE WITH BOARD POLICY:

- Consistent With Current Board Policy: Title #____ Chapter #____ Section #____
- X Amends Current Board Policy: *Title 4, Chapter 21, new Section 3-4*
- X Amends Current Procedures & Guidelines Manual: *Chapter 6, new Sections 7 and 8*
- Other:_____
- X Fiscal Impact: Yes____ No__X__
Explain:_____

POLICY PROPOSAL
TITLE 4, CHAPTER 21, *new* SECTION 3
Confidentiality of Data

Additions appear in *boldface italics*; deletions are [~~stricken~~ and bracketed]

Section 3. Confidentiality of Student and Employee Data

Limited access to student and employee specific data by staff of NSHE institutions solely for the purpose of conducting official NSHE business is permitted. The confidentiality of non-directory information included in the data regarding students and employees must be maintained.

POLICY PROPOSAL
TITLE 4, CHAPTER 21, *new* SECTION 4
Universal Identification (UID)

Additions appear in *boldface italics*; deletions are [~~stricken~~ and bracketed]

INSERT THE FOLLOWING NEW SECTION IN TITLE 4, CHAPTER 21:

Section 4. Universal Identification (UID)

- 1. Each NSHE student and employee will be assigned a single universal identification number (UID) that will be used at all NSHE institutions. UID-specific bio-demographic data will be synchronized across all institutions and changes to such data within a student or employee record will be made in accordance with procedures developed by the Chancellor.***

- 2. The UID will include the following data:***
 - a. Birthdate;***
 - b. Birthplace (city, state, and country);***
 - c. Social security number;***
 - d. Name (primary, preferred, diploma, Human Resources);***
 - e. Address (Home, Mailing, Billing, Diploma);***
 - f. Phone (Mobile, Home, Fax);***
 - g. FERPA directory release;***
 - h. Gender;***
 - i. Race/Ethnicity; and***
 - j. Date of death.***

- 3. Application Statement. Each institution must include on its student application form and employee personal data form a question regarding whether the student and/or employee attended (currently or previously) or is employed at another NSHE institution and, if so, request their NSHE issued UID. The Chancellor shall develop a common NSHE statement that will appear on all institutional student application and employee personal data forms.***

PROPOSED REVISIONS
PROCEDURES AND GUIDELINES MANUAL
CHAPTER 6, new SECTIONS 7 and 8

Additions appear in *boldface italics*; deletions are [~~stricken~~ and bracketed]

Section 7. Universal Identification (UID) – Procedures for Updating Student Information

- 1. All requests to change student data related to the UID must be accompanied by the NSHE Personal Identification Data change form. Documentation may be submitted in person, by mail or fax, or electronically. Documentation submitted by mail, fax, or electronically must be accompanied by a copy of a government issued photo ID.*
- 2. Any change of student data related to the UID must be appropriately documented by the institution initiating the change. All such documentation must be stored by the initiating institution.*
 - a. An institution may update a student's birth date with at least one of the following documents:
 - i. State or government issued photo ID;*
 - ii. Birth certificate; or*
 - iii. Valid Passport.**
 - b. An institution may update a student's social security number with each of the following documents:
 - i. Social security card; and*
 - ii. Government issued photo identification.**
 - c. An institution may update a student's name with at least one of the following documents:
 - i. Marriage license;*
 - ii. Divorce decree;*
 - iii. Court order;*
 - iv. Valid Nevada driver's license; or*
 - v. Military identification card.**
 - d. An institution may update student information related to date of death with a certified death certificate.*
 - e. An institution may update a student's gender information with at least one of the following:
 - i. Valid driver's license; or*
 - ii. Government issued identification card.**

3. *Electronic (scanned) documents used in verifying student data changes will be retained permanently at the initiating institution and will be available to any NSHE institution at which the student enrolls.*
4. *For current employees, the Human Resources Management System (HRMS) is the system of record for both their employee and student records.*
5. *The Chancellor's Office will oversee and maintain UID fields for the purpose of determining which data fields may be synchronized across the System.*

Section 8. *Universal Identification – Required Application Statement for Students and Employees*

The following statement must appear on all student application forms and employee personal data forms:

You are applying to an institution that is a member of the Nevada System of Higher Education (NSHE) and will be issued one identification number to be used at all NSHE institutions. Limited personal information is shared among NSHE institutions in accordance with NSHE policies governing the security and privacy of student and employee information.

RENUMBER SECTIONS 7 thru 13 AS SECTIONS 9 thru 15.