



Operating Protocol & Procedure

Details:

Number: 111

Title: External Requests for College Data

Category: Governance, Organization, and Institutional Effectiveness

Office of Primary Responsibility: Institutional Research

Approval Date: 3/13/17

Effective Date: 3/13/17

Revised:

Purpose:

To prevent any external data requests resulting in FERPA (Family Educational Rights and Privacy Act) violations, each request must be carefully examined before being resolved. Ultimate responsibility for the approval of these data requests must reside with the President of Pueblo Community College.

Applicability:

All external parties requesting student data, excluding governmental, state, and consortial agencies requiring aggregate data as part of an annual survey process including but not limited to IPEDS, NCES, and Colorado Department of Higher Education (CDHE).

Definitions:

Data request – Any request to the Institutional Research office (IR) or another reporting entity within the college that must be resolved using data sourced through the Colorado Community College System (CCCS) Banner system or that pertains to PCC students, employees, and other stakeholders, as well as PCC facilities or operations.

External party – Any person, persons, or agency not affiliated with PCC through current employment.

Reporting party – The designated PCC person or office already empowered to process data requests for PCC. This will vary depending on the nature of the requested data. Student records (including but not limited to enrollment, demographics, and unit-level records) must be processed by Institutional Research, student financial aid records must be processed by Financial Aid, employee records must be processed by Human Resources, and fiscal and operational records must be processed by the Business Office. Persons capable of accessing the records in question but not specifically and officially designated and responsible for doing so are not reporting parties for PCC.

Report – Final format of the data requested by the external party.

Non-reporting party – Any person or office at PCC not designated as an official reporting party.

IPEDS – The Federal Integrated Postsecondary Education Data System, to which all colleges and universities are required to report annually as a requirement of Title IV eligibility.

NCES – The Federal National Center for Education Statistics, which is responsible for maintaining IPEDS, College Navigator, College Scorecard, and other resources for public data retrieval, and to which all colleges and universities are required to report annually as a requirement of Title IV eligibility.

References:

Family Educational Rights and Privacy Act ([FERPA](#)) (20 U.S.C. § 1232g; 34 CFR Part 99)

Attachments/Related Forms or Documents:

None

Operating Protocol:

All data requests from external parties must have the approval of the President of Pueblo Community College before being processed by the relevant reporting party or office.

Procedure:

If an external party submits a data request to a non-reporting party, that request must be relayed to the relevant reporting party based on the type of data requested. If the non-reporting party is unsure of the official reporting party for the data in question, the request must be relayed to Institutional Research.

If the data request is relayed to the reporting party through the President’s Office, it is to be processed normally, as defined in PCC Operating Protocol 110.

If the data request is relayed to the reporting party through another PCC employee or office, or is directly sent to reporting party staff, the following procedure must be observed:

- 1) Reporting party logs the details of the request using the appropriate procedure for that office, with the status of the request entered as “Waiting for President Approval.”
- 2) Reporting party forwards all details of the request to the President’s Office using the [“pres@pueblocc.edu”](mailto:pres@pueblocc.edu) address.
- 3) Upon receipt of approval from the President, the reporting party change the status of the data request to “Open” and process the request.
 - a. Any limitations or modifications to the request made by the President will be observed by the reporting party.
 - b. The President may, but is not required to, request that the resulting report be reviewed before being sent to the external party.

- c. If this review is requested, the status of the data request will be changed to “Waiting for President Approval” pending review by the President.

After the report has been sent to the external party, the status of the request will be updated to “Closed.”