



PROCEDURE FOR ACCESS TO INSTITUTIONAL DATA

1. PURPOSE

- 1.1 Data are valuable assets of the West Virginia School of Osteopathic Medicine (“WVSOM”) and processes are needed to ensure that these resources are carefully managed, maintained, protected, and used appropriately. This procedure provides guidance to individuals interested in using institutional data, as defined herein, to support a project, initiative, or presentation.
- 1.2 This document addresses the protection of institutional data from accidental or intentional unauthorized disclosure while preserving the ability to access and use institutional data for appropriate purposes and setting guidelines for requesting, reporting, and/or publishing findings emanating from the use of institutional data.

2. APPLICABILITY

- 2.1 This procedure applies to:
 - 2.1.1 requests by researchers for scholarly work; and
 - 2.1.2 faculty representatives of standing or ad-hoc committees, academic departments for decision-support, departmental assessment, academic planning, or WVSOM institutional planning.
- 2.2 This procedure does not apply to data or records that are personal property of WVSOM employees, students, volunteers, or vendors, or data created and/or kept by such individuals for their own use. This includes data generated for the purposes of individual academic research.
- 2.3 WVSOM reserves the right to amend this procedure at any time, as necessary or appropriate.

3. GENERAL PROVISIONS

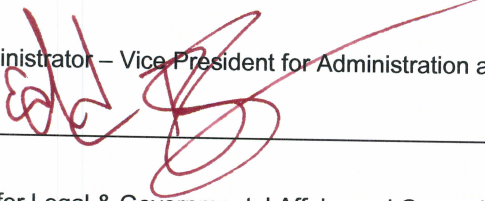
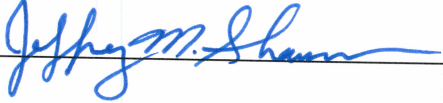
- 3.1 “Institutional data” means information created, collected, maintained, transmitted, or recorded by or for WVSOM to conduct institutional business. It includes the following:
 - 3.1.1 Data used for planning, managing, operating, controlling, documenting, staffing, or auditing WVSOM institutional functions, operations, and/or mission.
 - 3.1.2 Data created, received, maintained, or transmitted as a result of educational activities.
 - 3.1.3 Data in any format or medium including, but not limited to, information in paper, electronic, audio, and visual formats.
- 3.2 Some forms of data are highly confidential and fall under federal regulations (e.g., Family Educational Rights and Privacy Act (FERPA)) and may not be released in a public manner. Most of the data available is aggregate in nature i.e., there are no individual identifying factors that can be tied back to specific students or employees. Normally, all identifiers (personally identifiable information) will be stripped, thereby maintaining the confidentiality of the personal information.
- 3.3 Data that is moved, copied, extended or propagated is still considered institutional data.
- 3.4 WVSOM may limit access and distribution of institutional data at its sole discretion.
- 3.5 Data provided to individuals pursuant to this procedure shall:
 - 3.5.1 be used only for the purpose for which access was granted;

- 3.5.2 be protected from deliberate, unintentional, or unauthorized alteration, destruction and/or inappropriate disclosure or use;
 - 3.5.3 never be stored on a personally-owned computer or storage device; and
 - 3.5.4 be managed and maintained in accordance with Institutional Policy GA-31: Acceptable Use of Information Technology Resources.
- 3.6 Individual(s) requesting institutional data and any co-investigator(s) have the responsibility to ensure that appropriate methodologies are used for data analysis and that any results and conclusions are accurately reported to the target audience (e.g., a WVSOM committee) or the scientific and academic community, as well as selection of the vehicle for publication or presentation of research data and results.
- 3.7 Access to institutional data for academic research and inquiry may be approved subject to privacy rules and regulations, and appropriate WVSOM institutional review.
- 3.8 At the conclusion of the proposed project, the individual submitting the request must provide, as appropriate, a summary of how the results were used for WVSOM institutional improvement or provide articles, reports, presentations etc. that show the data were used.
- 3.9 Unless the Vice President for Academic Affairs and Dean gives advanced written consent, individuals involved in research projects may not take copies of institutional data for projects on which they have worked when they leave WVSOM.

4. PROPOSAL REVIEW

- 4.1 Requests for access to institutional data will be submitted for approval in writing to the appropriate Vice President overseeing the area where the information was created, collected, or recorded by or for WVSOM to conduct institutional business. For example, the Vice President for Academic Affairs and Dean would approve requests for access to academic/educational related data and the Vice President for Finance and Facilities would approve requests for access to finance and facility related data.
- 4.2 If WVSOM Institutional Review Board (IRB) clearance for the project is required, the request will not be processed until IRB approval documentation is provided.
- 4.3 The Office of Assessment and Educational Development (OAED) will coordinate the review of proposals for academic/educational data access only. In order to execute a transparent decision, OAED will utilize an ad hoc committee to review the data request. Membership of the ad hoc committee will include the Associate Dean for Assessment and Educational Development (Committee Chair), Coordinator for Institutional Research, Assistant Dean for Curricular Affairs, Chair of Osteopathic Principles and Practices or designee, Vice Chair of Biomedical Sciences, Vice Chair of Clinical Sciences, and the Registrar.
- 4.4 A request for data must include the reason for research, intended audience, and plans for dissemination and/or publication. When reviewing proposals, the ad hoc committee will evaluate the purpose, merits and design of the proposed project and recommend to the Vice President for Academic Affairs and Dean one of the following:
- 4.4.1 Approval for access to academic/educational data as outlined in the proposal;
 - 4.4.2 Conditional approval to academic/educational data access with revision to the proposal (with rationale for and details of suggested revisions provided); or
 - 4.4.3 Deny the request for access to academic/educational data and provide the rationale for the denial decision.

- 4.5 Approval of a request for access to academic/educational data by the Vice President for Academic Affairs and Dean will be based on the following criteria:
- 4.5.1 The purpose of the proposed project;
 - 4.5.2 The requested data adequately matches the proposed project;
 - 4.5.3 Theoretical grounding of the study design is evident;
 - 4.5.4 The importance and impact of the proposed project in advancing scholarship or programmatic improvement within WVSOM;
 - 4.5.5 The proposed project is consistent with and advances WVSOM's mission and priorities;
 - 4.5.6 The proposed project is conducted in a manner that minimizes conflicts with other research conducted by WVSOM or other investigators under previously approved projects;
 - 4.5.7 Plans for who will have access to the study outcomes including but not limited to internal institutional audiences, public disclosure (e.g., WVSOM committee meetings or meetings/presentations outside WVSOM) and publications; and
 - 4.5.8 The recommendation of the ad hoc committee.

Procedure Title: <u>Procedure for Access to Institutional Data</u>	
Effective Date: <u>November 3, 2021</u>	Time: <u>12:01 a.m.</u>
APPROVED BY:	
Approving Administrator – Vice President for Administration and External Relations: 	Date: <u>02 Nov 2021</u>
Vice President for Legal & Governmental Affairs and General Counsel: 	Date: <u>11-02-2021</u>