

CSS Confidentiality and Privacy

The College Senior Survey (CSS) collects information on a wide range of cognitive and affective measures, providing comprehensive institutional and comparative data for analyses of college experiences to measure the impact of college. In order to be able to conduct research at the national level regarding the experience of specific subgroups of students of interest we ask questions that allow us to understand who students are; what they do; and whether, how, and why they are changing. Because we ask these questions, we take the confidentiality and privacy of our data very seriously. This document is intended to help facilitate conversations with students regarding why they are being asked to complete the survey and how the information they provide will be used by HERI and on your campus.

An important step in talking with students about the CSS is to underscore why they are being asked to complete the instrument. At the national level, HERI uses the results to advance the national discussion about issues critical to higher education. At the local level, the information students provide will help your campus to measure the impact of college by understanding the academic, civic, and diversity outcomes for students. Results are frequently used to gauge the status of campus priorities; encourage discussions about best practices in teaching and learning; develop and enhance policies and practices for students; and improve curricula, instruction, and services. At both the national and campus levels, the results are confidential and will only be used to report aggregate findings.

The Instrument

The CSS does ask respondents for permission to retain their email address, name, student ID number, and date of birth for potential follow-up surveys. This information is in a separate file from responses to the CSS and is stored at HERI with restricted access.

UCLA's IRB has determined that all of the items on the CSS are of minimal risk, however there may be items that students would prefer not to answer. Respondents can choose to leave blank any item they are uncomfortable answering.

At HERI

When the data are returned to HERI, they are split in two separate files. The first file contains the names and addresses of respondents who have given their permission to have their names and emails retained. The second file contains the responses to the survey instrument. The files are linked by a key system consisting of a random 6-digit sequence number (subject ID) which is stored in both files. Students' responses to the questions therefore cannot be directly linked to those students' identifiers without possession of the key. The data stored in the second file is available for statistical analysis only to HERI staff, or to HERI-approved researchers, and contains no identifying information other than the subject ID mentioned above. More detailed data security information is available upon request.

The Results

The institutional reports that we prepare for you summarize the responses to survey items for your institution and comparison groups in several ways. Results (broken out by sex) are provided for: Full-time undergraduate students; transfer students; and all students.

Any reporting with fewer than five respondents will be suppressed in order to protect confidentiality. For example, if an institution had four female part-time student respondents and 30 male part-time respondents, the

female column in the part-time students report would be suppressed, while the male column would be returned, and 34 responses would be included in "all" part-time students.

HERI Data File

The HERI data file is an important resource for conducting additional meaningful analysis about your students. Many items on the survey can define potentially interesting sub-populations for investigation. It is for this reason that we return the unit record data to participating campuses. The data file you receive will not contain names or email addresses. If a respondent gives permission to HERI to retain their name and email address for follow-up surveys, that information is retained in a file separate from survey responses at HERI. It is not returned to campuses.

In order to receive the institutional data file, the appropriate campus representative must certify compliance with HERI's confidentiality agreement. It states that data will be used solely for statistical analysis and reporting of aggregate information, and not for the investigation of specific individuals. While it might be possible to identify an individual based on their answers to the CSS, the confidentiality agreement protects against this possibility. No one at your institution can have access to institutional data or results until this agreement has been signed, and they cannot investigate individual responses.

On Your Campus

You may also want to reassure students regarding how the data and results are treated on campus. Relevant information might include the security of your data storage systems, who has access to the data, and how you will handle reporting on small subpopulations. This is also an additional opportunity to underscore that the results of the survey will be used to better understand the student experience.

Confidentiality

The CSS collects personal identifiers and potentially sensitive demographic data. Student responses to these survey items make it possible to link CSS data with data from several sources such as other CIRP surveys (e.g., the CIRP Freshman Survey, DLE and YFCY), your campus registrar's office, other nationwide assessment instruments, and local assessment efforts.

Obligation to Report to a Third Party and Break Participant Confidentiality

In some states, the law requires researchers to disclose information they have concerning suicidal ideation, child abuse and elder abuse to appropriate third parties. Thus, questions surrounding these areas are not just sensitive but require institutions to break subject confidentiality in order to protect the participant, or others, from harm. If you ask such additional questions, you must provide an addendum to the Survey Information Sheet that you provide to participants to inform them of the researcher's obligation to disclose any respondent's intent to harm him or herself (suicide ideation) or others (elder or child abuse). These modifications to the Survey Information Sheet must be reviewed and approved by the UCLA IRB.

Students' right to confidentiality as human research subjects must remain a priority throughout the administration of the CSS. Please inform your students that the questionnaires are handled in a confidential and professional manner. Following are some specific points to consider with respect to the confidentiality of CSS data:

- Your survey collection procedures and data storage systems must be secured (e.g., locked storage, official representatives as proctors, etc.).
- Viewing student responses to questions on the CSS (other than the names of respondents for tracking purposes) prior to data processing is considered a breach of confidentiality. Assure students that no one at your institution will examine individual responses to survey questions.
- Your data file will not include personal identifiers such as name, and address, , but will include student ID.
- HERI does not release identifiable data to other researchers or to other agencies.
- The Research Approval Form states that the data will be used solely for statistical analyses and reporting of aggregated information, and not for the investigation of specific individuals.