

## 2023-2024 HEDS Operative Statement for Sharing Information from HEDS Products

(Updated on September 07, 2023)

The Statement of Understandings (SOU) describes important principles for how HEDS works. The SOU is meant to capture the reasons and rules for how we share data, knowledge, and expertise. Sharing is in our name—the Higher Education Data SHARING Consortium—and our mission identifies sharing as the way we work to advance liberal arts education, inclusive excellence, and student success. The SOU has two components: (1) a [Principles & Values Statement](#), which documents the reasons we share data, knowledge, and expertise in the consortium, and (2) this document, the Operative Statement, which outlines rules of the road for sharing. Together, these two documents describe the *why* and *how* of sharing in HEDS.

In the tables on the following pages, we describe how you can share and disseminate information you get from the consortium. In terms of “data, knowledge, and expertise,” this document focuses mostly on data from surveys and institutional data exchanges. However, we have also included rules for sharing information from the HEDS listserv and HEDS events.

For your convenience, we’ve created links to the rules for sharing for the following sources of data and information:

- [HEDS Non-Climate Surveys: HEDS Alumni Surveys; HEDS Graduating Student Survey; HEDS New Student Survey; HEDS Returning Student Survey; HEDS Student Satisfaction Survey](#)
- [HEDS Diversity and Equity Campus Climate Survey](#)
- [HEDS Sexual Assault Campus Climate Surveys](#)
- [HEDS Data Exchanges](#)
- [Baccalaureate Origins of Earned Doctorates](#)
- [HEDS Listserv](#)
- [HEDS Webinars, Workshops, and Conferences](#)
- [Overall summary reports on HEDS survey or institutional data](#)

We will update this document annually to include new rules for sharing HEDS products and services.

We’ve used the following principles to develop these guidelines:

1. We want to promote the use of HEDS data to help institutions implement their missions. HEDS data won’t be useful unless they are shared on our campuses, and more often than not, sharing data means contextualizing data with comparisons to other institutions.
2. We also want to promote the easy exchange of knowledge and expertise within and across member institutions. Once again, it’s hard to learn something from knowledgeable colleagues unless they feel free to share their knowledge, both within and across institutions. But describing the application of knowledge and expertise also requires contextualization, which can mean sharing additional information about our institutions.
3. We want to promote sharing data, knowledge, and expertise, but we also need to value the rights of member institutions, and individuals at member institutions, to control how information that may identify them are shared at or across other HEDS institutions. In essence, we need to promote sharing but also ensure the confidentiality of the information that’s shared.

We try to strike this balance in the practical rules of the road we describe below. We want to give institutions the flexibility to use the information that HEDS shares in ways that help them advance their missions while at the same time ensuring that institutional data, practices, and possible concerns are not identifiable.

***Rule of Five***—We mention the *Rule of Five* several times in the tables below. The *Rule of Five* means that you can only identify the institutions in your comparison group if that group contains at least five institutions. If your comparison group includes less than 5 institutions, you cannot name the institutions without written permission from the primary contacts<sup>1</sup> and, when using data from HEDS surveys, the survey liaisons at those institutions. You must also send copies of those permissions to the HEDS Director.

HEDS collects and shares a lot of different kinds of data. This means that these rules are complex. Please let us know if you have any questions, comments, or concerns about what we've outlined below. We will also be sure to include the relevant rules for sharing with any data that we distribute (e.g., in survey reports or data exchange spreadsheets).

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<sup>1</sup> See <https://www.hedsconsortium.org/heds-college-university-members/> for a list of primary contacts. Please contact us to find out who the survey liaisons are.

Data Source	Share with restrictions	Share without restrictions
<b>HEDS Non-Climate Surveys</b> <ul style="list-style-type: none"> <li>• HEDS Alumni Survey</li> <li>• HEDS Graduating Student Survey</li> <li>• HEDS New Student Survey</li> <li>• HEDS Returning Student Survey</li> <li>• HEDS Student Satisfaction Survey</li> </ul>	<p><b>Your institution's open-ended comment data file</b>  This file contains the open-ended comments that your students made on the survey. It also includes some demographic information about the students who made the comments. Students may identify themselves or other people on campus in their comments. You may share this comment data file with others at your institution as long as you maintain a degree of confidentiality consistent with a) your institution's practices and IRB review (if necessary) and b) the survey's informed consent as outlined in the survey's introduction.</p> <p><b>Your institution's unit-record data file</b>  We send all institutions a unit-record data file (typically an MS Excel and/or SPSS file) that includes data from only your students or alumni. For non-climate surveys, these files typically contain identifying information from people who respond to the survey (e.g., names, emails addresses). You are free to share the results of any analyses from this unit-record data in any way you'd like so long as you maintain the confidentiality of the survey respondents. You may also share the unit-record data file itself, as long as you maintain a degree of confidentiality consistent with a) your institution's practices and IRB review (if necessary), <u>and b) the survey's informed consent as outlined in the survey's introduction.</u></p> <p><b>Custom consortium reports that institutions ask HEDS to produce</b>  A group of institutions may choose to administer a HEDS non-climate survey as part of a consortium and receive custom reports that show data separately for each institution in the consortium. Because these reports show data from individual institutions, you should treat the reports the same way you would treat data that identify students, i.e., allow limited circulation among people at your institution who understand and will follow their obligation to keep these data confidential. You should never circulate data or analyses that link individual institutions and their data beyond this small group.</p>	<p><b>Summary report</b>  We send all participating institutions (both members and non-members) one or more summary reports comparing your institution to other institutions. Summary reports list all participating institutions, and they aggregate data from all institutions besides your own into one or more comparison groups. The summary reports do not identify data from individual institutions. Therefore, you are free to share these reports however you'd like.</p> <p><b>Online real-time data update</b>  When we open your survey, we create a website that shows accumulated aggregated data on select closed-ended questions from your students and alumni. This website updates continuously throughout your institution's survey window. Because this update only includes aggregate data from people in your campus community, you are free to share this information in any way that you'd like. Please note, this website is not permanent and will be available for roughly 60 days.</p>

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<b>HEDS Diversity and Equity Campus Climate Survey</b>	<p><b>Your institution's open-ended comment data file</b>            We send all institutions an MS Excel file with the open-ended comments that your institution's students and employees made on the survey. These open-ended comments are not linked to the unit-record data file, but the comment data file includes some demographic information about the people who made the comments. Even though HEDS has reviewed all comments and removed the names of anyone who identified themselves or was accused of discrimination and/or harassment along with information that could lead to the identification of people who have been accused of discrimination and/or harassment, you should exercise caution in sharing these data files at your institution. When your institution administered this survey, it committed to maintaining the anonymity of respondents. It's possible that people who read the open-ended comments may, based on their knowledge of your institution, be able to deduce the identity of respondents who made comments.</p> <p><b>Your institution's unit-record data file</b>            Because of the sensitive nature of this survey, we promise to protect the identity of everyone (staff, faculty, and students) who takes the survey. We take this promise to heart. We do not include the names, email addresses, student or employee identification numbers, or IP addresses from people who respond to the Diversity and Equity Campus Climate Survey in your unit-record data file. However, in answering the surveys' many demographic questions, people will provide substantial information about their identity, background, and role at your institution. If you add supplemental questions to your survey, these questions may provide even more information about people's identities. Even at large institutions, it may be possible to use a combination of a survey participant's responses to identify them. Given the sensitive nature of what survey participants may report in this survey, we ask institutions to agree to the following conditions to protect participants' privacy and confidentiality before we send you a unit-record survey data file:</p> <ol style="list-style-type: none"> <li>1. No more than 5 people at your institution will have access to the unit-record data file that HEDS sends to you.               <ol style="list-style-type: none"> <li>a. Managers, Deans, Program Directors, Department Chairs, and other supervisors should not be among the 5 people who have access to your institution's unit-record file unless a) their direct reports have not participated in the survey, or b) their access is essential for analyzing your institution's survey data.</li> <li>b. Given their contact with students, faculty should not be among the 5 people who have access to your institution's unit-record file unless their access is essential for analyzing your institution's data.</li> </ol> </li> <li>2. Undergraduate students will not have access to the unit-record data file.</li> <li>3. The people who have access to the unit-record data file from HEDS will be required to follow your institution's rules, policies, and procedures for protecting and maintaining the confidentiality of sensitive, identifiable student and employee information.</li> <li>4. You will ensure that all reports or presentations based on data from the unit-record data file will follow an "n&gt;4" rule, and not include any statistical information or findings based on a group smaller than 5 people.</li> </ol>	<p><b>Comparison report</b>            We send all participating institutions (both members and non-members) a summary report that compares your institution to other institutions. The summary report lists all of the institutions that participated in the survey, but it aggregates data from all institutions besides your own into one or more comparison groups. These summary reports do not identify data from individual institutions. Therefore, you are free to share these reports in any way that you'd like.</p> <p><b>Online real-time data update</b>            When we open your survey, we create a website that shows accumulated aggregated data on select closed-ended questions from your students, faculty, and staff. This website updates continuously throughout your institution's survey window. Because this update only includes aggregate data from people in your campus community, you are free to share this information in any way that you'd like. Please note, this website is not permanent, and will be available for roughly 60 days.</p>

Data Source	Share with restrictions	Share without restrictions
<b>HEDS Sexual Assault Campus Climate Surveys</b>	<p><b>Your institution's open-ended comment data file</b>            We send all institutions an MS Excel file with the open-ended comments that your institution's students or employees made on the survey. These open-ended comments are not linked to the unit-record data file, but the comment data files include some demographic information about the people who made the comments. Even though HEDS has reviewed all comments and removed the names of anyone who identified themselves or was accused of sexually harassing and/or assaulting someone along with information that could lead to the identification of people who have been accused of sexual harassment and/or assault, you should be very careful with how you share these data files at your institution. It's possible that people who read the open-ended comments may, based on their knowledge of your institution be able to deduce the identity of respondents who made comments.</p> <p><b>Your institution's unit-record data file</b>            We send all institutions a unit-record data file that includes data from only your students or employees. Because of the sensitive nature of this survey, we promise to protect the identity of everyone (staff, faculty, and students) who takes one of these surveys. We take this promise to heart. We do not include the names, email addresses, student or employee identification numbers, or IP addresses from people who respond to the Sexual Assault Campus Climate Surveys in your unit-record data files. We also remove some variables and/or combine response options into broader categories. Given the sensitive nature of what survey participants may report in this survey, we ask institutions to agree to the following conditions to protect participants' privacy and confidentiality before we send you unit-record survey data files:</p> <ol style="list-style-type: none"> <li>No more than 5 people at your institution will have access to the unit-record data file that HEDS sends to you.               <ol style="list-style-type: none"> <li>Given their contact with students, faculty should not be among the 5 people who have access to your institution's unit-record file for the undergraduate or advanced degree surveys unless their access is essential for analyzing your institution's data.</li> <li>Managers, Deans, Program Directors, Department Chairs, and other supervisors should not be among the 5 people who have access to your institution's unit-record file unless a) their direct reports have not participated in the survey, or b) their access is essential for analyzing your institution's survey data.</li> </ol> </li> <li>Undergraduate students will not have access to the unit-record data file.</li> <li>The people who have access to the unit-record data file from HEDS will be required to follow your institution's rules, policies, and procedures for protecting and maintaining the confidentiality of sensitive, identifiable student and employee information.</li> <li>You will ensure that all reports or presentations based on data from the unit-record data file follow an "n&gt;4" rule, and not include any statistical information or findings based on a group smaller than 5 people.</li> </ol>	<p><b>Summary report</b>            We send all participating institutions (both members and non-members) one or more summary reports that compare your institution to other institutions. Summary reports aggregate data from all institutions besides your own into one or more comparison groups. These summary reports do not identify data from individual institutions. Therefore, you are free to share these reports in any way that you'd like.</p> <p>Because of the extreme sensitivity of the data we collect in these surveys, participating institutions have <i>complete</i> control over whether or not they acknowledge that they've participated in the surveys. That means that, unlike our other summary reports, we do not list the institutions that participated in these surveys. We will never publicly identify institutions that have participated in these surveys, and even if you know the identity of other HEDS institutions that participated in the surveys, you are obligated to keep their identity confidential unless you have explicit permission from the institutions' survey liaisons and primary contacts. You must also send copies of those permissions to the Director of HEDS.</p>

Data Source	Share with restrictions	Share without restrictions
<b>HEDS Data Exchanges</b> <ul style="list-style-type: none"> <li>Common Data Set</li> <li>Faculty Compensation</li> <li>First Destinations</li> <li>NACUBO Tuition Discounting</li> <li>National Survey of Student Engagement (NSSE)</li> <li>Number of Deposits</li> <li>Retention and Graduation Rates</li> <li>Starting Salaries</li> </ul>	<p><b>All data exchange spreadsheets, reports, and files may be shared with restrictions.</b></p> <p>You should treat data that identify institutions the same way you would treat data that include information that identifies students or employees, i.e., allow limited circulation among people at your institution who understand and will follow their obligation to keep these data confidential. You should never circulate data or analyses that link individual institutions and their data beyond this small group.</p> <p>You should only develop reports from these data for your institution if your institution has contributed to the data set. Your data is the “fee” you pay for using the data for analyses and reports.</p> <p>You should feel free to analyze these data for reports or other work on your campus, but in any documents where you disseminate your findings, you should follow the <a href="#">Rule of Five</a> for describing your comparison groups.</p>	
<b>Baccalaureate Origins of Earned Doctorates</b>	<p><b>This data file should not be shared outside of the consortium.<sup>2</sup></b></p> <p>When using the Baccalaureate Origins of Earned Doctorates data to describe the performance of your institution on this outcome, please adhere to the following guidelines:</p> <ol style="list-style-type: none"> <li>1. Use descriptions of your institution that highlight percentile ranks or comparisons to broad groups of institutions. For example, “[HEDS Institution name] is in the top 10% of institutions whose students go on to earn doctorates,” or “[HEDS Institution name] is in the top 10 of institutions whose students go on to earn doctorates,” or “A higher percentage of students from [HEDS Institution name] go on to earn doctorates than any other institution in the Midwest.”</li> <li>2. Be cautious in using explicit ranks in statements or analyses. For example, we suggest avoiding, “[Institution name] is ranked 8th among liberal arts colleges in the number of students who go on to earn doctorates, compared to [Competitor institution name] which is ranked 9th, and [Comparison institution name] which is ranked 10th.” The gaps between adjacently ranked institutions are so small that such statements could be misleading.</li> <li>3. Avoid publicly listing HEDS institutions that you are using as your comparison group with these data. Once again, saying “ranked first among top private institutions in the South” is fine, but saying, “We are ranked higher than [HEDS Institution 1], [HEDS Institution 2], and [HEDS Institution 3],” violates the spirit of the HEDS Statement of Understandings.</li> </ol> <p>See the memo we issued on 5/18/2020 for more information.<sup>3</sup></p>	

<sup>2</sup> See <https://www.hedsconsortium.org/heds-college-university-members/> for a list of consortium members.

<sup>3</sup> See <https://hedsconsortium.box.com/s/8xdw09xvc52qqa1es5pk2r1qs2x8d513> for a copy of the message we sent to the listserv.

Data Source	Share with restrictions	Share without restrictions
<b>HEDS Listserv</b>	<p><b>All information from the listserv may be shared with restrictions.</b></p> <p>You should treat the listserv as a private, HEDS-only community. We encourage people at HEDS institutions to post questions to the listserv. One of the benefits of the HEDS listserv is that it is populated by hundreds of people with diverse backgrounds, expertise, and knowledge, so the listserv community can address a wide range of questions.</p> <p>When you post a request for specific data or information, it's helpful to mention in your request that responses should be sent only to you. In the spirit of collaboration, we ask that you share a summary of the responses you receive with the entire listserv. This summary is how you contribute to the knowledge and expertise of the HEDS community and thank the people who took the time to respond to your query. Since the HEDS listserv is a HEDS-only community, you should feel free to identify institutions in your summaries.</p> <p>Some listserv posts prompt broad discussion about a topic, and it's appropriate to respond to the entire listserv. If you respond to a listserv post requesting specific data or information, please send your response directly to the person who posted the question rather than to the whole listserv. Everyone on the listserv will receive a summary of all the responses compiled by the person who posted the question.</p> <p>You should treat all summaries or responses to questions on the listserv that identify institutions the same way you would treat information that identifies students or employees – that is, allow limited circulation among people at your institution who understand and will follow their obligation to keep these data confidential. You should never circulate data or analyses that link individual institutions and their data beyond this small group. You should also feel free to analyze these data for reports or other work on your campus, but in any documents where you disseminate your findings, you should follow the <a href="#">Rule of Five</a> for describing your comparison groups.</p> <p>For full instructions on using the listserv, please refer to the <a href="#">HEDS Listserv Guide</a>.</p>	



Data Source	Share with restrictions	Share without restrictions
<b>HEDS Webinars, Workshops, and Conferences</b>	<p><b>Presenters</b></p> <ul style="list-style-type: none"> <li>• When giving a presentation using quantitative data, follow the <a href="#">Rule of Five</a> with comparison groups.</li> <li>• Begin your presentation with a slide describing how audience members can share the data or the information you intend to present. If you don't say anything, people will assume that the data or information can be shared freely, with no restrictions. Otherwise, please let audience members know what restrictions you'd like, e.g., "What's said here stays here," or "This is only to be shared among HEDS institutions."</li> </ul> <p><b>Participants</b></p> <ul style="list-style-type: none"> <li>• Please abide by the rules of sharing as specified by the presenters.</li> <li>• Any comments you make in the webinar will follow the rules of the road that the presenters or webinar organizers lay out at the beginning of the presentation/webinar. Please note, HEDS webinars are recorded.</li> </ul>	
<b>Overall summary reports on HEDS survey or institutional data</b>		<p>These reports discuss aggregate data and do not identify the institutions that participated or discuss data for individual institutions. They are designed to be public, and they do not fall under the HEDS Statement of Understandings. You may share them without restrictions.</p>