

To: Our colleagues at HEDS institutions  
From: Charlie Blaich and Kathy Wise  
RE: Updating the HEDS Statement of Understandings  
Date: 8/21/2020

The Statement of Understandings is a core document for HEDS. Signing the Statement of Understandings is one of the first things that institutions do when they join HEDS. The Statement is supposed 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.

Unfortunately, the Statement of Understandings needs an overhaul. It was developed for the HEDS of the 1990s and 2000s, and our mission, our membership, and the world of higher education has since changed. For these reasons, the HEDS Board has decided to revise the Statement of Understandings this year. The board will begin working on a draft this fall and present it to the membership for discussion and eventually a vote in the spring. Revisions to the Statement of Understandings, like approving the consortium’s annual budget, are one of the actions that require the approval of members. (See Article III, Section 3.10 of the HEDS Bylaws.)

Recently, we’ve received a number of questions from people at member institutions about how they can share and disseminate data that they get from the consortium. However, in its current form, the Statement of Understandings doesn’t address these questions. The revisions we will bring to the membership in the spring will address these questions. In the meantime, we wanted to outline some temporary rules of the road for data sharing that we’d like you to follow for the upcoming year. These rules may or may not end up in the draft of the Statement of Understandings that we’ll bring to the membership in the spring. But until we can provide a complete overhaul of the Statement, we hope these temporary rules allow us to provide clear and consistent answers to some of the questions that we get from member institutions.

We’ve used the following design principles in developing these temporary guidelines:

1. We want to promote the use of HEDS data to help institutions implement their missions, and data, including the ways that we make sense of data, are rarely useful if they aren’t shared. More often than not, sharing data means contextualizing data with comparisons to data from 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 to control how information that may identify their data or practices are shared at or across other HEDS institutions. In essence, we need to promote sharing but also ensure the confidentiality of institutional information.

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 data that HEDS shares in ways that help them advance their missions while at the same time ensuring that institutional data are not identifiable.

## Overall Summary Reports

This spring, we began writing overall summary reports for our COVID-19 surveys that highlighted key findings and provided information on how we analyzed the data.<sup>1</sup> These reports are designed to be public and do not, therefore, include any information that identifies the institutions that participated in the survey. Furthermore, we do not discuss data for individual institutions in the report. We only discuss aggregate data looking across all the institutions that participated in the survey. Therefore, these reports do not fall under the HEDS Statement of Understandings.

## Data Sharing Rules for All Non-Climate Surveys

These include the HEDS Alumni Survey, HEDS First Destination Survey, HEDS New Student Survey, HEDS Research Practices Survey, HEDS Returning Student Survey, HEDS Senior Survey, and the HEDS COVID Surveys.

1. You can share the following from these surveys *without any restrictions*:
  - Summary report: We send all participating institutions (both members and non-members) a summary report comparing your institution to other institutions. The summary report lists all of the HEDS members and non-members 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.
2. You can share the following from these surveys *with restrictions*:
  - Your institution's unit-record data file: We also send all institutions a unit-record data file (typically an MS Excel or SPSS file) that includes data from only your students, alumni, or employees. 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.
  - Unit-record data file with data from all participating HEDS institutions: For many of these surveys, HEDS institutions have the option of downloading a unit-record data file that includes data from all HEDS institutions that participated in the survey. This data does not include personal information from the people who took the survey, but it does include information that identifies the participants' institutions. In using this unit-record data file:
    - o You should treat data that identify institutions 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.
    - o 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 *Rule of Five* for describing your comparison groups. 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 survey liaisons and primary contacts<sup>2</sup> at those institutions. You must also send copies of those permissions to the HEDS Director.
  - Custom reports that consortiums or institutions ask HEDS to produce: The *Rule of Five* applies to any custom reports that HEDS produces. So, you can only identify the institutions in your comparison

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<sup>1</sup> See <https://www.hedsconsortium.org/wp-content/uploads/2020.05.15-HEDS-COVID-Student-Survey-Update-Student-Background.pdf> and <https://www.hedsconsortium.org/wp-content/uploads/2020.07.24-COVID-19-Staff-Memo.pdf> for examples.

<sup>2</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.

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 survey liaisons and primary contacts at those institutions. You must also send copies of those permissions to the Director of HEDS.

### Data Sharing Rules for the HEDS Diversity and Equity Campus Climate Survey

1. You can share the following data from this survey *without any restrictions*:
  - Summary report: 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 HEDS members and non-members that participated in the survey, but it aggregates data from all institutions besides your own into one or more comparison groups.
  - Your institution's unit-record data file: We also send all institutions a unit-record data file that includes data from only your students and employees. However, because of the sensitive nature of this survey, we promise anonymity to everyone (staff, faculty, and students) who takes this survey. *And we take this promise to heart.* This means we will deprecate identifying information in your institution's unit-record data file to ensure that you will not be able to identify the people who took the survey based on their responses. This will limit the kinds of analyses that you can do with your unit-record data file.
2. You can share the following data from this survey *with restrictions*:
  - Your institution's open-ended comment report: We send all participating institutions (both members and non-members) a report with the open-ended comments that your institution's respondents made to the survey. These open-ended comments are not linked to the unit-record data. Even though HEDS has reviewed all comments and removed identifying information from the comments, you should exercise caution in sharing these reports 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 reports may, based on their knowledge of your institution, be able to deduce the identity of respondents who made comments.
3. Given the sensitive nature of the data this survey collects, we do not share a multi-institution unit-record data file from this survey with HEDS institutions.

### HEDS Sexual Assault Campus Climate Surveys

1. You can share the following data from these surveys *without any restrictions*:
  - Summary report: We send all participating institutions (both members and non-members) a summary report that compares your institution to other institutions. The summary report aggregates data from all institutions besides your own into one or more comparison groups. Because of the extreme sensitivity of the data we collect in this survey, participating institutions have *complete* control over whether or not they acknowledge that they've participated in this survey. That means that, unlike our other summary reports, we do not list the institutions that participated in the survey. 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.
  - Your institution's unit-record data file: We also send all institutions a unit-record data file that includes data from only your students or employees. However, as we do with the unit-record data file

from the HEDS Diversity and Equity Campus Climate Survey, we promise anonymity to everyone who takes this survey. This means that we will also deprecate identifying information in your institution's unit-record data file(s) to ensure that you will not be able to use the data to identify individual participants. This will limit the kinds of analyses that you can do with your unit-record data file(s).

2. You can share the following data from these surveys with restrictions:

- Your institution's open-ended comment report: As we do with the HEDS Diversity and Equity Campus Climate Survey, we send all participating institutions (both members and non-members) a report with the open-ended comments that your institution's respondents made to the survey. These open-ended comments are not linked to the unit-record data. Once again, even though HEDS has reviewed all comments and removed identifying information from the comments, you should exercise caution in sharing these reports at your institution. It's possible that people who read the reports may, based on their "insider knowledge," be able to deduce the identity of respondents who made comments.
- Comparison tool: We send all HEDS institutions that participate in the undergraduate version of the survey a spreadsheet with institution-level data for key questions and indicators. The spreadsheet is set up so that you can quickly choose institutions to include in a custom comparison group. This spreadsheet should be treated with the same care and commitment to confidentiality as data that include identifiable information about students or employees. You should not identify the institutions in your custom comparison groups in any reports or materials that you disseminate, whether within your institution or publicly, without receiving written permission from the institutions' survey liaisons and primary contacts. You must also send copies of those permissions to the Director of HEDS.

### HEDS Data Exchanges

These include the AAUP Faculty Compensation Data, Common Data Set, Deposits, NACUBO Tuition Discounting Study, NSSE, Student Success (starting this fall), and Starting Salaries Data.

1. You can share these data with restrictions:

- Once again, you should treat data that identify institutions the same way you would treat data that include information that identify 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.
- 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.
- 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 *Rule of Five* for describing your comparison groups. 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 of those institutions. You must also send copies of those permissions to the HEDS Director.

## Listserv

1. You can share information from the listserv *with restrictions*:

- You should treat the listserv as a closed and private community resource. 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.
- When you post a question to the listserv, please summarize the responses you receive and send them back to the whole listserv. This summary is how you contribute to the knowledge and expertise of the HEDS community and thank the people who took time to respond to your query. Since the HEDS listserv is private and inside our community, you should feel free to identify institutions in your summaries.
- If you respond to a question on the listserv, 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.
- You should treat all summaries or responses to questions on the listserv as you treat other HEDS data. That is, you should feel free to analyze any data you receive for reports or other work on your campus, but in any documents where you disseminate your findings, you should not identify the institutions who provided data or information unless you have permission from the primary contacts at those institutions. You must also send copies of those permissions to the HEDS Director.

## Webinars

We're starting to host more webinars, so we thought we'd give some guidance for sharing data in webinars.

1. When giving a presentation using quantitative data, follow the *Rule of Five* with comparison groups.
2. Begin your presentation with a slide describing how audience members can share the data. We'll create categories for presenters to use (e.g., "tell anyone," "what goes on here stays here," "this is only to be shared among HEDS institutions").
3. Please assume that 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 webinar.

## Baccalaureate Origins of PhDs

1. The data file should not be shared outside of the consortium.<sup>3</sup>
2. Follow the guidance for sharing data that we issued on 5/18/2020.<sup>4</sup>

As you can see, 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 above. We will be sure to review the relevant rules for sharing with any data that we distribute.

Thanks,

Charlie Blaich and Kathy Wise

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<sup>3</sup> See <https://www.hedsconsortium.org/heds-college-university-members/> for a list of consortium members.

<sup>4</sup> See <https://hedsconsortium.box.com/s/8xdw09xvc52qqa1es5pk2r1qs2x8d513> for a copy of the message we sent to the listserv.