UNIVERSITY OF SOUTH FLORIDA SYSTEM

☑ **USF System**   ☐ **USF**   ☐ **USFSP**   ☐ **USFSM**

Number:	**11-007**
Title:	**Data Submission to External Entities**
Responsible Office:	**Academic Affairs**

Date of Origin: 8-24-18   **Date Last Amended:**   **Date Last Reviewed:**

I.   PURPOSE & INTENT

Institutional data are a strategic asset of the University of South Florida System (USF System) and the appropriate management and use of data is critical to the University's operations. Inappropriate use of data can result in inefficiencies and exposes the University to unwanted risk, including risk to its brand and reputation. The purpose of this policy is to communicate to the USF System, the roles and responsibilities for responding to requests from External Entities that involve provision of institutional data. This policy specifies the coordinating role of the USF System Office of Decision Support (ODS) and reserves the title Office of Decision Support and/or "ODS" for this University administrative office and restricts any other USF administrative office from using the title or acronym.

Related Policies:

1. USF System Policy 0-507, Data Management defines institutional data and describes the University's data management policy and states that all USF System employees must recognize that the proper management of institutional data is critical to the success of the organization.
2. USF System Policy 0-508, Information Security Structure, defines the University's Information Security Structure.
3. USF System Policy 0-106, Public Records Law Compliance and Record Confidentiality, defines the procedure for maintaining and responding to requests for Public Records.
4. USF System Policy 0-023, Internal Control, sets forth the internal control objectives and establishes standards in the design and implementation of the system of internal controls for the USF System.

II.   **STATEMENT OF POLICY**

Institutional data requested by external entities will be considered and furnished pursuant to University policies and protocols to ensure legitimacy of the request and accuracy of any data submitted. Upon approval by the Accountable Officer, the Unit Data Coordinator will engage with the USF System Office of Decision Support for review and processing of the request adhering to the highest standards of data integrity. Prior to external submission and in compliance with the relevant University Policies, ODS will approve data sources and definitions and ensure rigorous documentation and verification standards are upheld.

III.   **APPLICABILITY & AUTHORITY**

The Policy applies to all units/offices across the USF System and provides guidelines for processing data requests by External Entities with the following limitations and exceptions:

A. *Requests from the Florida Board of Governors* (see BOG Regulation 3.007), including official information requests, routine annual requests, and adhoc special requests, which will be managed by the USF System Office of Data Administration & State Reporting. As an additional data integrity control, the Data Administrator will collaborate with ODS for review before submission to the Florida BOG.
B. *Financial-Related data* which will be processed as specified by USF Business & Finance.
C. *Data Generated from Faculty Research* which will be processed under the Research Protocols (see USF Use of Human Subjects in Research Policy 0-305 and Research Integrity & Compliance)
D. *Patient-Related data* which will be processed as specified by USF Health (see USF Use of Human Subjects in Research Policy 0-305 and Research Integrity & Compliance)
E. *Public Record Requests for documents* will be processed under the USF Public Records Policy 0-106 and required submission of the Public Records Request Form and payment of any related costs including ODS costs.
F. *Routine and mandated reporting* if the Unit or Office has requested and received written approval from ODS for an exemption from review or for appropriate redirection to an alternate office of the USF System (i.e., a USF System designated office, or an office within USF Tampa, USF Health, USF St. Petersburg or USF Sarasota-Manatee).

IV.   **DEFINITIONS**

A. **Accountable Officer:** The Accountable Officer is the person who is at the leadership level in the Unit or Office (ordinarily a University Vice President or Dean). The

Accountable Officer holds the responsibility of identifying the Unit Data Coordinator and certifying the submission before final submission to the External Entity.

B. **External Data Requests:** Data requests from an External Entity (i.e., outside agencies or offices or persons). External data requests to whom this policy applies, generally include, but are not limited to:

- Guidebooks for prospective students (College Board, Princeton, etc.)
- Publications by external entities (NSF, CUPA, ACT, etc.)
- Ranking publications – international and domestic (U.S. News and World Report, Times Higher Education, etc.)
- Surveys administered by or on behalf of external entities (NSSE, THE-WSJ, Princeton Review, etc.)
- Other external reports available to the general public.
- Mandated reports (IPEDS, etc.)
- Research grants that require University data
- Contractual reporting (AAUP, etc.)
- Accrediting Bodies (SACSCOC, specialized accrediting agencies)

C. **External Data Submission**: The release or production of documents in response to a request to an External Entity.

D. **External Entity:** External Entity is defined as an outside agency, organization, company, office or persons.

E. **Institutional Data**: Institutional data are defined as all data elements created, maintained, received, or transmitted as a result of business, educational or research activities of a USF System unit or office and may include one more of the following characteristics:

- Relevant to the operations, planning, controlling or auditing of business functions of both administrative and academic units.
- Generally referenced or required between more than one administrative and academic unit.
- Included in an officially published USF System report.
- Generated or derived by any entity of the USF System or employee, or an affiliate or agent of the USF System.
- Classified and constrained in accordance with USF System, state, and federal laws and policies.

F. **Quality Assurance**: The maintenance of a desired level of quality in a service or product, especially by means of attention to every stage of the process of delivery or production.

G. **Unit Data Coordinator:** University employee identified by the unit's Accountable Officer as the liaison/coordinator between the External Entity and the USF System and the USF System Office of Decision Support.

H. **Unit or Office:** Any unit or office within the USF System.

V. GENERAL GUIDELINES

External Data Requests not exempted in Section III above, must go through the USF System's Office of Decision Support (ODS) which has established procedures for processing those requests details of which may be accessed on the <u>ODS Data Request site.</u> General guidelines for Unit Data Coordinator and ODS are outlined below.

General Guidelines:

1. Unit Data Coordinator Responsibilities:
    a. Notify ODS of an external data request (new or recurring) within three (3) business days of receipt using the USF System ODS <u>External Data Request form.</u> Exceptions will be considered with appropriate justification.
    b. Ensure extensions are secured and/or timely submission of an external request.
    c. Serve as the liaison with the External Entity, as needed.
    d. Adhere to data integrity standards.
    e. Maintain proper documentation of the data submission.
    f. Ensure completeness of the data submission.
    g. Secure certification by the Accountable Officer before final approval by ODS for submission to the External Entity.
    h. Retain a completed copy of the data submission for archival purposes.
2. ODS responsibilities:
    a. Developing and implementing the Quality Assurance protocols to be followed by Unit Data Coordinators.
    b. Conduct a thorough assessment of the external data request.
    c. Ensure completeness of the data submission.
    d. Review and approve before release of the data submission to the External Entity. Review considers purview of data collected/reported, ensure face validity, review documentation is in place, assess trends and/or impact to the university brand/reputation.
    e. Ensure certification by the Accountable Officer before submission to the External Entity.

Current Responsible Office*: Academic Affairs
*Refer to the appropriate Responsible Office website for a current name of the Vice President or other Responsible Officer.

History: New 8-24-18