PIERPONT
COMMUNITY & TECHNICAL COLLEGE.

External Data Reporting and Approval Policy

Effective: June 2025

PURPOSE

The purpose of this policy is to ensure the accuracy, consistency, and integrity of all data reported to external parties by the College. By requiring review and approval of data by the Office of Institutional Effectiveness (OIE) prior to release, the College can maintain a single source of truth for institutional data. This policy supports compliance with accreditation standards and government regulations and protects the College's reputation by preventing the dissemination of incorrect or conflicting information.

SCOPE

This policy applies to all departments, faculty, staff, and units of the College, without exception unless a specific exemption is granted as described below. It covers any data values or statistical information prepared for audiences outside the College, regardless of the medium of communication. This includes, but is not limited to:

- Official reports to government agencies (federal or state reports, regulatory submissions, IPEDS data, etc.).
- Accreditation materials and reports to accrediting bodies or professional licensing organizations.
- Public relations and marketing content (press releases, brochures, website content, social media posts, presentations) that contain numerical data or institutional statistics.
- Surveys and questionnaires from external organizations (ranking surveys, research studies, media inquiries) where institutional data is provided.

For the purposes of this policy, "external reporting" means any information sharing where the intended audience includes individuals or organizations outside of the College. If there is any uncertainty about whether data will be considered external, employees should err on the side of caution and seek OIE review.

Exemptions: In rare cases, a specific department and the OIE may jointly grant a written exemption for certain data or reports. Such an exemption must be agreed upon by both the Office of Institutional Effectiveness and the relevant department head and must clearly outline the scope of data covered. Exemptions are expected to be minimal and are typically granted only when alternative review processes are in place that satisfy the intent of this policy. Unless an explicit exemption has been approved in writing by both parties, this policy remains applicable.

POLICY

Policy Statement:

All data values intended for external reporting must be reviewed and approved by the Office of Institutional Effectiveness (OIE) prior to release. No faculty member, staff member, or department shall disseminate institutional data externally without obtaining approval from OIE. This requirement covers every instance of sharing quantitative information such as enrollment figures, graduation rates, performance metrics, survey results, or any other statistical data about the College.

Under this policy, the OIE serves as the authoritative source for official institutional data. The OIE is responsible for verifying that data are accurate, up-to-date, and consistent with official records and definitions. Only data that has been vetted and approved by OIE may be considered official and ready for external use. This ensures that the College "speaks with one voice" regarding institutional data, thereby avoiding confusion or misrepresentation that could arise from multiple sources reporting similar information. Any discrepancies identified by OIE during the review process must be resolved before the data can be released outside the College.

Non-numerical information (qualitative descriptions, general statements) typically does not fall under this policy unless it includes or is based on specific data values. However, all members of the College community are encouraged to consult OIE when in doubt about any information planned for external distribution. Adhering to this policy is mandatory and is a condition of employment and departmental operation within the College.

Roles and Responsibilities:

Office of Institutional Effectiveness (OIE): The OIE is charged with overseeing the implementation of this policy. Key responsibilities of OIE include:

- **Data Verification and Approval:** Review all proposed external data submissions for accuracy and consistency with official college records. Approve data for release or provide corrected figures if necessary.
- **Official Data Source Maintenance:** Maintain the official institutional databases and reference documents (e.g., enrollment statistics, retention and graduation rates, faculty/staff data, program outcomes) that serve as the source for external reports.
- **Guidance and Training:** Offer guidance to departments and individuals on data definitions, reporting standards, and proper procedures for requesting data. Provide training or resources as needed to ensure compliance (for example, training on how to request data or common data definitions used in reports).
- **Record-Keeping:** Keep a record of data requests and approvals. Document what data was reviewed and the date of approval. Retain copies of approved datasets or reports for accountability and future reference.
- **Periodic Review:** Periodically review the policy's effectiveness and update procedures in collaboration with college leadership. OIE may also perform audits or spot-checks of externally released information to ensure ongoing compliance.

Department Heads and Supervisors: Leaders of each department or unit are responsible for enforcing this policy within their areas. Their responsibilities include:

- **Communication:** Ensuring that all employees (faculty and staff) in their department are aware of and understand this policy. New employees should be informed of this requirement during onboarding.
- **Internal Oversight:** Establishing internal processes so that any data prepared for external use by members of the department is routed to OIE for review. This may involve creating an internal checkpoint or requiring departmental approval before OIE submission.
- **Coordination with OIE:** Acting as a liaison between their department and OIE when needed. For complex data requests or large reports, department heads should coordinate early with OIE to schedule sufficient review time.
- **Enforcing Compliance:** Addressing any instances of non-compliance within the department. If a staff or faculty member in the department releases data without approval, the department head should take corrective action in line with this policy and in consultation with OIE and Human Resources if necessary.

Faculty and Staff (All Employees): Every employee of the College has a responsibility to uphold this policy. Specific duties for individuals include:

- **Prior Approval:** Before sharing any institutional data externally (even informally, such as in response to an email inquiry from outside, or a presentation at a conference that will be publicly available), employees must ensure the data has been approved by OIE. If the data or report is new, it is the employee's responsibility to submit it to OIE for review **well in advance** of the intended release date.
- **Use of Official Data:** Wherever possible, use data provided directly by OIE or data from official publications released by OIE (such as an annual fact book or official statistics on the College website) for external reporting. Do not rely on personal compilations or unofficial sources for official reporting.
- **Complete and Accurate Submission:** When requesting OIE review, provide all relevant information about the data, including context, definitions, and sources used. For example, clarify the time period covered, population definitions (e.g., "first-time full-time students entering Fall 2024"), and any calculations or methodology. This helps OIE verify the data correctly.
- **External Requests Handling:** If an employee is directly approached by an external entity (e.g. a survey firm, news reporter, or government agency) requesting data, the employee should **not** provide the data immediately. Instead, they should either redirect the inquiry to OIE or gather the requested information and submit it to OIE for approval before responding. It is acceptable to tell the requester that "I will confirm these figures with our Office of Institutional Effectiveness and get back to you."
- **Confidentiality and Data Security:** While this policy is about accuracy in external reporting, employees must also maintain confidentiality and data privacy as required by other policies (e.g., FERPA for student data). Only non-confidential aggregate data should ever be considered for external release, and OIE will also ensure that no sensitive personal data is being inappropriately disclosed.

Executive Leadership: The college's executive leaders (President, Vice Presidents) support this policy by reinforcing its importance and ensuring adequate resources for OIE to fulfill its role. They are also involved in enforcement actions if policy violations need escalation. For instance, a Vice President or the President may issue formal communications or directives in cases of serious non-compliance to underline the institutional commitment to data integrity.

Procedures:

All College personnel must follow these procedures when preparing data for external release:

1. **Identify Need for External Data:** When a department or individual determines that data needs to be shared outside the College (for example, completing an external survey, drafting a grant proposal with institutional data, or creating a marketing brochure with statistics), they should plan for OIE review as early as possible. Ideally, notify OIE of the need as soon as it is identified, especially if there are deadlines imposed by the external party.
2. **Submit Data or Request to OIE:** The responsible employee (or department) compiles the data intended for external use and submits it to OIE for review. If the data is not already compiled, the employee should submit a **data request** to OIE outlining what information is needed. Submissions to OIE should include:
   o A clear description of each data element (e.g., "total fall 2025 enrollment, including full-time and part-time students").
   o The source of any preliminary data the department has (e.g., internal database, survey results).
   o The context or purpose of the data use (who will receive it and how it will be used externally).
   o The deadline by which the approved data is needed to meet external requirements.
3. **OIE Review Process:** Upon receiving the data or request, OIE will verify the accuracy and consistency of the information:
   o OIE will cross-check figures against official records (student information systems, HR records, finance systems, or other authoritative data sources as appropriate).
   o If data definitions or calculations are involved, OIE will ensure they align with standard institutional definitions or, if it's for a specific survey, align with the definitions provided by that survey.
   o OIE may contact the requester for clarification or additional information during this review to resolve any discrepancies or questions.
4. **Revision and Clarification (if needed):** If OIE finds that the submitted data contains errors, is outdated, or uses non-standard definitions, OIE will correct the data or advise on necessary revisions. OIE will communicate any changes to the requester and explain the reasons (for instance, "updated graduation rate to 55% to include the latest fall cohort, which differs from the 50% initially provided").
5. **Approval:** Once OIE is satisfied that the data is accurate and compliant with official definitions, OIE will formally approve the data for external release. Approval may be communicated via an official email, a signed form, or a documented note on the request. The approval will explicitly list the data values that are approved, and if appropriate,

attach the finalized dataset or report. **Only after receiving this approval may the data be released externally.**

6. **Release of Data to External Party:** The department or individual may then proceed to transmit or publish the data to the external party or platform, using the OIE-approved figures exactly as provided. No substitutions or modifications should be made to the data post-approval without further consultation with OIE. If the external party has follow-up questions or requests for additional data not covered in the original approval, those additional data points must also undergo review (return to step 2 for new data).

7. **Documentation and Archiving:** The OIE will record that the data was reviewed and approved, including what was approved and when. The requesting department is encouraged to keep a copy of the OIE approval (such as saving the approval email or form) and the final data submitted externally. This documentation can be important for future reference, especially if questions arise later about what was reported.

8. **Timeline Considerations:** Employees should allow sufficient time for the OIE review process. Typically, a minimum of **5–7 business days** advance notice is recommended for standard data requests. Larger or more complex data reports (such as major accreditation self-study data or comprehensive surveys) may require more lead time (several weeks). OIE will make efforts to accommodate urgent requests, but last-minute submissions risk being delayed or not approved in time, which could jeopardize the external reporting deadline. It is the responsibility of the requester to plan accordingly and engage OIE early in the process.

9. **Emergency or Expedited Cases:** In exceptional situations where data must be released immediately (e.g., an urgent request from a government agency with a 24-hour turnaround), the requester must still notify OIE. OIE will attempt to expedite the review. If OIE is unable to formally approve due to time constraints, at minimum an **verbal or email clearance** should be obtained from the Director of OIE or a designated representative before releasing the data. Such cases should be followed up with a full review after the fact to ensure the data released was indeed accurate.

10. **Exemption Procedure:** For any instance in which a department believes an exemption to this policy is justified (for example, a specialized research unit that regularly reports data to a federal research body under its own quality controls), the department head should submit a written request to the OIE outlining the rationale for exemption. The OIE will evaluate the request and, if it agrees, will document the terms of the exemption jointly with the department. Even with an exemption, the department might still be required to provide periodic reports to OIE to ensure consistency. All exemptions must be reviewed at least annually to determine if they remain warranted.

11. **External Data Requests Routing:** The College may establish a standard point-of-contact for external data requests (for example, instructing external parties on the College website to direct data inquiries to the OIE's email). Employees who often receive external questions can refer requesters to that contact. This helps streamline the process and ensures OIE is aware of all outgoing data. OIE will coordinate with relevant departments to fulfill such requests.

By following these procedures, the College ensures that data released to external audiences is accurate, consistent, and approved, thereby upholding the integrity and credibility of the institution's communications.

Enforcement:

Ensuring compliance with this policy is critical. All employees and units are expected to adhere to the requirements outlined above. **Non-compliance** with the External Data Reporting and Approval Policy will be taken seriously and may result in corrective actions or disciplinary measures. Enforcement of this policy will be carried out as follows:

- **Monitoring and Audit:** The OIE, in collaboration with College leadership, may monitor external communications and reports for compliance. This can include reviewing copies of reports submitted to external agencies or scanning public releases for data that should have been approved. If unapproved data releases are discovered, the responsible department or individual will be contacted for an explanation.
- **Correction and Retraction:** If data is released externally without OIE approval or if incorrect data is released, the first priority is to correct the information. The responsible individual or department, in coordination with OIE, must **immediately notify the external entity** that received the data and issue a correction or retraction. For example, if an incorrect statistic was published in a press release or report, a corrected version must be sent out as soon as possible. The College may also post corrections on its own platforms if needed (such as issuing an updated press release or footnote on the website).
- **Formal Warning:** The employee(s) and their supervisor may receive a **formal written warning** for failing to follow this policy. This warning will be documented in the individual's personnel file. The warning will outline the nature of the violation (e.g., "Released enrollment figures to media without OIE approval on [date]") and reiterate the expectations moving forward. In the case of faculty, such warnings may also be copied to the academic dean or relevant vice president.
- **Mandatory Training:** In some cases, the College may require the person or department in violation to undergo additional training. This might involve a refresher session with OIE on data reporting procedures or an online training module on data governance. The goal is to prevent future incidents by ensuring a full understanding of the policy.
- **Restrictions on Future Communication:** An individual or department that violates the policy may be subject to **heightened oversight** for future external communications. For instance, a department could be required to route *all* external communications (even those without data) through a supervisor or the Public Relations office for a certain period. An individual might lose the privilege of responding to external data requests directly; instead, any inquiry they receive must be forwarded to OIE or their supervisor. These restrictions would typically be temporary and reviewed after a period (e.g., after one year of compliance, the restrictions might be lifted).
- **Repeated or Egregious Violations:** If a person or department repeatedly fails to comply with this policy, or if a single violation is deemed especially serious (for example, willfully providing false data externally, or causing significant reputational or legal harm to the College), the matter will be escalated. Consequences can include:
  - Reporting the issue to the appropriate Vice President or the President's Office.
  - Disciplinary action in accordance with the College's human resources policies, which could range from additional reprimands up to and including termination of employment in severe cases.

- o Removal of certain responsibilities from a staff member (e.g., they may be barred from handling data or participating in external reporting projects).
  - o If the violation involves academic departments, it may affect considerations in performance evaluations or leadership appointments.
- **Accountability and Review:** All enforcement actions taken will be documented by OIE and, where applicable, by Human Resources. The College's Policy Committee or similar governing body may review cases of non-compliance to determine if further changes to procedures or additional safeguards are needed. On an annual or biennial basis, OIE will report summary information (without personal identifiers) to senior leadership on the number of approvals processed and any compliance issues encountered, to ensure transparency and improvement of the process.

The College is committed to a culture of data integrity and accountability. Enforcement of this policy is not intended to be punitive, but rather to underscore the importance of accurate data reporting and to remedy issues before they can compromise the College's obligations or reputation. By following this policy and cooperating with OIE for all external data reporting, employees help protect both themselves and the College from the consequences of misinformation. All members of the College community share in the responsibility to uphold these standards and will be held accountable for their role in maintaining the integrity of external data communications.