

WTCS Guide to Securing Student Information

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Family Educational Rights and Privacy Act (FERPA)

‘[FERPA](#) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.’ Under FERPA, we are expected to protect any personally identifiable information about our students, which includes both direct and indirect personal identifiers (see the next section) and suppressing information for small subgroups of students when data are reported in aggregate form (see the ‘Protecting Small Subgroups’ section).

Personally Identifiable Information

Personally identifiable information (PII) includes, but is not limited to:

- The student’s name;
- A personal identifier, such as the student’s Client ID, District ID, or Social Security Number
- Other indirect identifiers, such as the student’s date of birth
- Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the college community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty;
- Information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates. (34 CFR § 99.3)

This PII definition is from the National Center for Education Statistics (NCES) Statewide Longitudinal Data Systems (SLDS) Technical Brief on ‘[Statistical Methods for Protecting Personally Identifiable Information in Aggregate Reporting](#)’ (2010).

Protecting Small Subgroups

When sharing information about students with your stakeholders (college groups, national partners, WTCS publications, etc.), care must be taken to suppress information for small subgroups: any group that has fewer than 10 students. Most importantly, **student-level records are never to be shared** in a System-Called Meeting, report, email, etc.

Sharing student information/data in System-Called Meetings and presentations

Often in System-Called Meetings, we share printouts or presentation slides of Tableau dashboards and/or portal reports for each college. If you are interested in sharing this information, please follow the protocol, below.

1. First, before sharing this information with your groups, check in with your AVP to make sure that the information that you plan to share is allowable.
2. If you anticipate that external individuals (e.g., WIDs, external presenters/keynote speakers, etc.) will be present, then you will need to take a more structured and controlled approach in which you provide printouts and/or PowerPoint slides of the dashboards/portal reports that suppresses the small group (fewer than 10 students) information. See an example of both a dashboard and portal report with suppressed small group information in the [appendix](#). There is also step by step instructions for suppressing small groups in excel.
 - a. If you have any questions on how to suppress the small group information – please ask the WTCS Data Team – Hilary Barker (hilary.barker@wtcsystem.edu) or Ben Konruff (ben.konruff@wtcsystem.edu).
3. If you anticipate that only college staff will be in attendance, then you can perform live Tableau demonstrations in which you drill into the data as a group to assess student equity gaps, possible underlying factors, etc. Yet, before launching into the data, share the [WTCS FERPA power point slide](#) that describes that the information in the session may contain small subgroups of students and thus participants in the session cannot take screenshots or photos of the data.

For more information, see our [WTCS FERPA Statement](#) on mywtcs, which is also included in the Tableau dashboard manuals and the Educational Services Manual.

Code of Data Ethics

This code is from National Center for Education Statistics (NCES) report, [The Forum Guide to Data Ethics](#) (2010).

Integrity

- Demonstrate honesty, integrity, and professionalism at all times.
- Appreciate that, while data may represent attributes of real people, they do not describe the whole person.
- Be aware of applicable statutes, regulations, practices, and ethical standards governing data collection and reporting.
- Report information accurately and without bias.
- Be accountable, and hold others accountable, for ethical use of data.

Data Quality

- Promote data quality by adhering to best practices and operating standards.
- Provide all relevant data, definitions, and documentation to promote comprehensive understanding and accurate analysis when releasing information.

Security

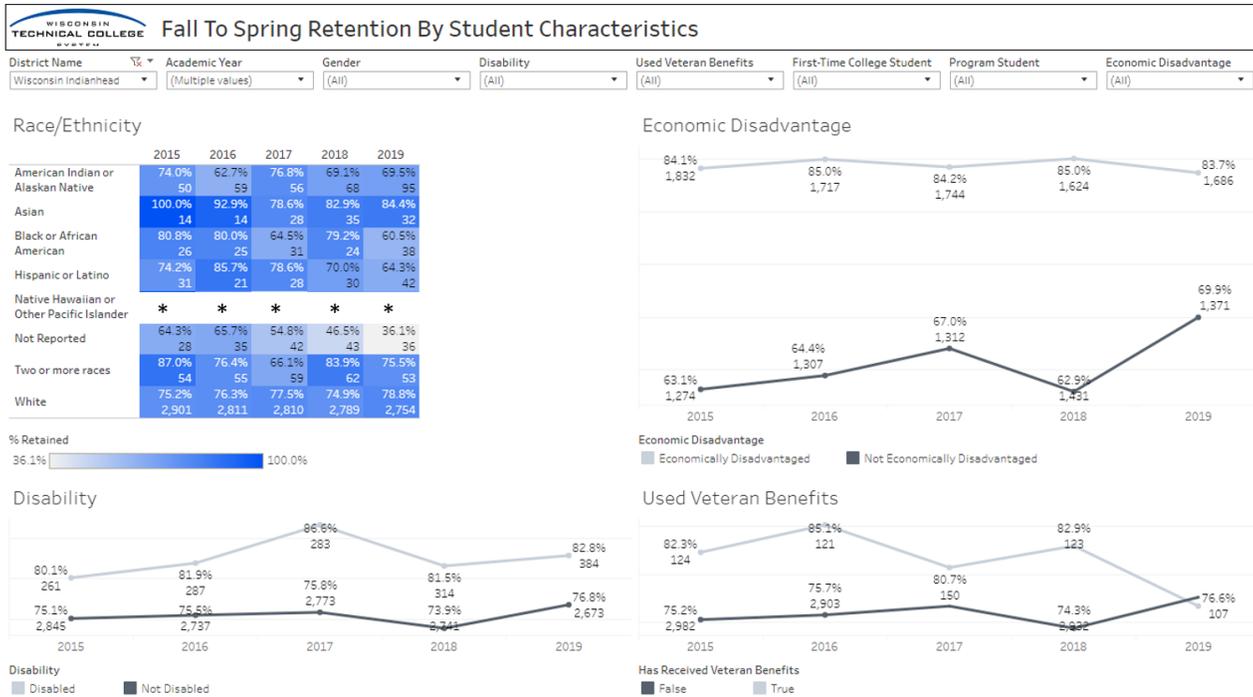
- Treat data systems as valuable organizational assets.
- Safeguard sensitive data to guarantee privacy and confidentiality.

Student Information Requests from External Groups

Often external groups (researchers, outside agencies) and WTCS college staff who are working on their dissertation will ask for student data. When you receive these requests, notify your Associate Vice President and our Director of Strategic Advancement (Conor Smyth, conor.smyth@wtcsystem.edu) before responding to the request.

Appendix

Example dashboard printout:



* Not reported to protect subgroups with fewer than 10 students.

Example portal report printout:



Client Reporting System Public High School Graduates Enrolling at WTCS by High School and District

Run On: 6/16/2020 9:56:31 AM

District: Nicolet Area Technical College
High School Graduation Year: 2018
WTCS Enrollment Through Academic Year: 2018-2019
Program Aid Codes: 10, 30, 31, 32, 50, 20

High School	BTC	CVTC	FVTC	GTC	LTC	MDSN	MILW	MPTC	MSTC	NATC	NTC	NWTC	SWTC	WCTC	WITC	WTC	Enrolled Total	Total Grads*	Percent Enrolled
CRANDON HIGH SCHOOL	0	0	*	0	0	0	0	0	*	20	0	0	0	0	0	0	24	62	38.71%
NORTHLAND PINES HIGH SCHOOL	0	0	*	0	0	*	0	0	0	18	*	*	0	0	0	*	24	99	24.24%
ELCHO HIGH SCHOOL	0	0	*	0	0	0	0	0	0	*	*	*	0	0	0	0	10	*	1000.00%
LAONA HIGH SCHOOL	0	0	0	0	0	0	0	0	0	*	*	0	0	0	0	0	*	*	42.86%
MERCER HIGH SCHOOL	0	0	0	0	0	0	0	0	0	0	*	*	0	0	0	0	*	*	28.57%
LAKELAND UNION HIGH SCHOOL	0	0	*	0	0	*	0	0	*	28	*	0	0	0	0	0	37	153	24.18%
PHELPS HIGH SCHOOL	0	0	0	0	0	0	0	0	0	*	0	0	0	0	0	0	*	14	28.57%
RHINELANDER HIGH SCHOOL	0	0	*	0	0	*	*	0	0	46	*	0	0	0	*	*	55	195	28.21%
THREE LAKES HIGH SCHOOL	0	0	0	0	0	*	0	0	0	*	0	*	0	0	0	0	*	35	22.86%
TOMAHAWK HIGH SCHOOL	0	*	*	0	0	*	0	0	0	11	18	0	0	0	0	0	33	107	30.84%
WABENO HIGH SCHOOL	0	0	0	0	0	0	0	0	0	*	0	*	0	0	0	0	*	25	24.00%
DHSS: LINCOLN HILLS SCHOOL	0	0	0	0	0	0	0	0	0	0	0	*	0	0	0	0	*	0	0.00%
Total	0	*	14	0	0	*	*	0	*	148	30	*	0	0	*	*	213	719	29.62%

Key to technical colleges: BTC - Blackhawk Technical College; CVTC - Chippewa Valley Technical College; FVTC - Fox Valley Technical College; GTC - Gateway Technical College; LTC - Lakeshore Technical College; MDSN - Madison Area Technical College; MILW - Milwaukee Area Technical College; MPTC - Moraine Park Technical College; MSTC - Mid-State Technical College; NATC - Nicolet Area Technical College; NTC - Northcentral Technical College; NWTC - Northeast Wisconsin Technical College; SWTC - Southwest Wisconsin Technical College; WCTC - Waukesha County Technical College; WITC - Wisconsin Indianhead Technical College; WTC - Western Technical College

* Not reported to protect subgroups with fewer than 10 students.

Suppressing small subgroups in Excel

To readily find and replace values in excel that are between 0 and 10 with an asterisk (*), follow these steps:

1. Highlight the cells with the student numbers that you would like to assess
2. Select 'Conditional Formatting', 'Highlight cell rules', 'Between'
3. Enter '1' into the first value box and '9' in the second value box
4. In the third value box, use the drop-down arrow to select a 'Custom format' in the 'with' value box
5. For the custom format, choose 'Number', 'Custom' and in the 'Type' value box insert: "*"
6. Select 'OK'

The screenshot displays the Microsoft Excel interface. The 'Format Cells' dialog box is open, showing the 'Number' tab. The 'Type' field is set to 'Custom' and contains the format code '*'. The 'Between' conditional formatting rule is also visible, showing the range '1' to '9' with the custom format '*'. The background shows a spreadsheet with a list of high schools and their enrollment data.

High School	BTC
ALBANY HIGH SCHOOL	*
BELOIT MEMORIAL HIGH SCHOOL	46
BELOIT F. J. TURNER HIGH SCHOOL	12
BRODHEAD HIGH SCHOOL	14
CLINTON HIGH SCHOOL	15
EDGERTON HIGH SCHOOL	11
EVANSVILLE HIGH SCHOOL	*
JANESVILLE GRAPES DRIVE WOOD	43
SCHENCKLE PARKER DENVER MOUNT	52
JUDA HIGH SCHOOL	*
MILTON HIGH SCHOOL	17
MONROE HIGH SCHOOL	16
MONTECELLO HIGH SCHOOL	*
PARKVIEW HIGH SCHOOL	*
BELOIT KAPLAN VIRTUAL SCHOOL	0
JANESVILLE PARKS LEADERSHIP	*
ADAMS	*
ROCK UNIVERSITY HIGH SCHOOL	*
JANESVILLE VIRTUAL ACADEMY	*
JANESVILLE ROCK COUNTY	*
WATERLOO	*

0	0	22	125	17.60%
0	*	59	406	14.53%
0	0	53	305	17.38%
0	*	*	33	24.24%
0	*	25	271	9.23%
0	0	39	161	24.22%
0	0	*	25	32.00%
0	0	*	51	7.84%
0	0	0	*	0.00%
0	0	*	13	7.69%
0	0	*	23	4.35%
0	0	*	0	0.00%
0	0	*	0	0.00%