

TO: Kate Shaw, Deputy Secretary for Postsecondary Education, PDE

FROM: Don Francis, President, AICUP

DATE: October 2, 2008

SUBJECT: Pennsylvania Information Management System (PIMS)

Thank you for providing the AICUP Board with a memo describing PDE's PIMS initiative, the benefits for independent colleges and universities to participate in the PIMS program, and your request for a continuing dialogue with AICUP and its members to resolve any concerns that may exist regarding the privacy of students and the costs incurred by institutions. As you requested, I am providing you with this memo to identify the most pressing issues facing AICUP members (as identified by the AICUP Board of Directors) regarding this new initiative.

1) The major concern regards the privacy of students and the security of the data. Although FERPA, by itself, does not appear to serve as a barrier to providing student-level data to PDE, colleges and universities still maintain the primary responsibility of ensuring that student records are maintained in accord with the privacy protections of FERPA. Therefore, the AICUP Board thinks it prudent and appropriate to seek specific safeguards from PDE. These safeguards include:

- Request that PDE include representatives from AICUP on any policy-making committee relating to the higher education component of PIMS.
- Request that PDE provide a detailed report on how student-level data collected from colleges and universities will be utilized for educational assessment and evaluation activities and a schedule for such activities.
- Request that PDE provide clarification regarding the procedures and timeline for the destruction of personally identifiable student information contained in PIMS as required by FERPA.
- Request that PDE develop and issue regulations that clearly articulate what access will be provided to aggregate student data and to personally identifiable student data on the request of other educational or state agencies in Pennsylvania, outside researchers, or other interested parties.
- Request that PDE provide assurance that no college or university will be liable for a data breach once student-level data is transferred to PIMS.

2) Another concern regards the cost of implementing this system. Providing this data will require extensive staff time and may present a financial burden to many institutions. While the presidents on the AICUP Board recognized the potential for student unit record data eliminating the need for the PDE to collect other reports during the year, no specifics

were presented as to what particular surveys, reports or other data collection activities could be eliminated if PIMS were in place. Furthermore, presidents did not understand why this information needs to be collected three or four times a year instead of simply once a year. The repetition of the data submission would clearly increase the cost of the program.

3) AICUP Board members had several other questions regarding the information, how it could benefit the institutions as described in your September 10 memo and how policymakers will use this data. Specifically, they want to know exactly what information will be collected and what level of access will individual institutions have to data in PIMS? What will the PDE or other state agencies or policymakers use this data for? We recognize you cannot answer for future administrations or legislatures, but you can provide more specificity about the plans of the current Administration for this data system.

I hope this helps you identify the future work needed to be done in order to provide the necessary confidence that will allow for many of Pennsylvania's private colleges and universities to join this program. I look forward to discussing this with you in the future.