

# MICHIGAN STATE UNIVERSITY

## Name, Gender, Sexual Identity and Pronoun MSU System Inventory Guidelines

July 2021

### Background

MSU is committed to increasing diversity, ensuring equity, and promoting inclusion. We want to provide data for our campus community that is both accurate and inclusive. Language is shifting and changing all of the time, as is our understanding of sexuality and gender. We are committed to collecting data that supports inclusion and success of all campus community members while maintaining privacy.

Data is one way to shift culture to promote and practice inclusion. MSU system modifications will be required in support of prefix, name, gender, sexual identity, and pronoun policy recommendations. System inventory guidelines will define the system impacted and inform the requirements for modifications to those systems.

### Definitions

**CORE SYSTEM:** Directly collects, manages changes, and stores demographic personally identifiable (PII) data. It is commonly referred to as “the system of record” for the data types.

**AUXILIARY SYSTEM:** Pulls data directly from core systems, but does not directly collect or manage changes to the data.

**PRIORITY SYSTEM:** A system that collects, manages, and/or impacts the most users and/or facilitates interaction with campus stakeholders (i.e., students, employees, alumni, donors, etc.) that should be included in a first phase update cycle.

**PERSONALLY IDENTIFIABLE INFORMATION (PII):** The term “PII,” as defined in OMB Memorandum M-07-1616 refers to information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. In performing this assessment, it is important for an agency to recognize that non-PII can become PII whenever additional information is made publicly available - in any medium and from any source - that, when combined with other available information, could be used to identify an individual.

Demographic personally identifiable (PII) data:

- **LEGAL NAME:** The name that appears on an individual’s legal documents (i.e. passport, drivers license, Social Security card)
- **LEGAL SEX:** This is the gender marker on a person’s government issued ID (i.e. driver’s license or passport) - female, male, X
- **NAME:** The name used by an individual for daily self-identification, and should be used at all times to refer to that individual unless legality requires otherwise.
- **GENDER:** A person’s deep-seated, internal sense of who they are as a gendered-being, specifically, the gender which they identify themselves - woman, man, cisgender, transgender, non-binary, genderqueer, gender non-conforming, agender, two-spirit, prefer not to specify, enter your own: \_\_\_\_\_

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- **SEXUAL IDENTITY:** Identities related to a person's feelings of attraction towards other people - asexual, bisexual, demisexual, gay, lesbian, queer, questioning or unsure, same-gender loving, straight, prefer not to specify, enter your own: \_\_\_\_\_
- **PRONOUNS:** Linguistic tools we use to refer to ourselves or others - she/her/hers, he/him/his, they/them/theirs, enter your own: \_\_\_\_\_
- **PREFIX:** a title used before a person's name (i.e. Mr., Ms., Mx., Dr.) - Ms, Mr, Mx, Mrs, Dr, Rev, enter your own: \_\_\_\_\_

## **Implementation Guidelines**

**Collection:** Only the following CORE systems will collect data

- SIS & Admissions (prefix, legal name, name, legal gender, gender, sexual identity/orientation, pronouns)
- HR (prefix, legal name, name, legal gender, gender, sexual identity/orientation, pronouns)
- Advancement (prefix, legal name, name, legal gender, gender, sexual identity/orientation, pronouns)

**Management:** Only the following CORE systems will manage changes to data

- SIS & Admissions (prefix, legal name, name, legal gender, gender, sexual identity/orientation, pronouns)
- HR (prefix, legal name, name, legal gender, gender, sexual identity/orientation, pronouns)
- Advancement (prefix, legal name, name, legal gender, gender, sexual identity/orientation, pronouns)
- Identity Management (student, employee, prefix, legal name, name, legal gender, gender, sexual identity/orientation, pronouns)

**Storage & Access:** Each of these data types will be stored in the student, admissions, HR, advancement, and identity management transaction databases to support collection and data management.

Additionally, the data will be made available for auxiliary system and reporting use through data warehouse and real-time Application Program Interface (API). The following data management and access solutions should be followed:

- A combined “name” view can be made available to auxiliary systems and users of the data warehouse and be populated with the name value if one exists OR the legal name if one does not.
- A combined “gender” view can be made available to auxiliary systems and users of the data warehouse and be populated with the gender value if one exists OR the legal gender if one does not.
- A secured view can be made available to auxiliary systems and users with a need to display or report for each of the following data types:
  - Sexual Identity/Orientation
  - Pronouns
- Prefix, legal name, and legal gender currently exist in data structures available to any user of the data warehouse.

**Name display policy:** The previous MSU policy for preferred first name indicated displaying the legal name followed by the preferred first name in parenthesis. This policy has been updated to display the appropriate name, legal name or name, per the table below. All instances of those displays “(preferred first name)” are to be updated.

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Access controls: All data created by the new policy (legal name, name, legal sex, gender, sexual identity, pronouns, prefix) are classified as Personally Identifiable Information (PII) and will be protected as such per University policies and practices.

## Family Educational Rights and Privacy Act (FERPA):

Michigan State University ("the University") maintains student education records and is responsible for their access to and release in accordance with the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g ("FERPA"). It is the policy of the University to comply with FERPA.

## Required Fields:

- Name
- Pronouns

Note: If the system includes a "legal sex" field, then a "gender" field is required.

## **Priority MSU Systems**

The following systems have been identified as priority systems to be modified in support of the new policy:

- CORE - Admissions (Slate)
- CORE - Financial Aid (Student Financial Planning)
- CORE - Student Information System (Slate, Student Financial Planning, Campus Solutions)
- CORE - Employee Application System (PageUp)
- CORE - Human Resources System (SAP)
- CORE - University Advancement System (Salesforce)
- CORE/AUXILIARY - Identity Management System (SailPoint)
- AUXILIARY- Academic System (Desire2Learn)
- AUXILIARY - Instructional Rating Systems (SIRS and SOCT)

## **RESOURCES**

[Name, Gender, Sexual Identity and Pronoun Data Policy](#)

[Statement of Expectations for Staff and Faculty](#)

[Diversity, Equity and Inclusion Plan](#)

[MSU Mission Statement](#)

[MSU RO: Academic Programs - General Procedures and Regulations Student Name](#)

[Office of the Registrar Data Request Form](#)

[Family Educational Rights and Privacy Act \(FERPA\)](#)

[MSU Strategic Focus Areas/Goals: increase diversity, ensure equity, promote inclusion, enhance outreach and engagement](#)

## **SYSTEM IMPLEMENTATION QUESTIONS/CONSIDERATIONS**

Auxiliary vended applications don't tend to be as configurable as core vended applications & MSU may have limited ability or influence over functionality change. How do we scope "best attempt" expectations for these situations? Consider the practice implemented for compliance with the accessibility policy (e.g., best attempt in near term ... required support during contract renewal times).

For priority systems identified, what should be the timeline to complete changes needed to collect, store, and make the data available to auxiliary systems? How will MSU stakeholders (students, employees, alumni) be notified that they can change data currently in systems?

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For remaining systems (e.g., systems of collection, display, report, communication), what should be the timeline to ensure display, usage of the new/appropriate data types?

How do we manage collisions between systems of collection (SIS/Admissions and HR and Advancement)? Today we have issues identifying a "winner" with legal name. For name, if a person's record is in both SIS & HR systems, the HR system name wins.

What are the rules for when to use legal name, gender (government reports, financial aid, communications to home, note there is some guest access to some systems)?

The University should outline what happens if this policy/expectations are not met. It would be useful to have an explicit statement that faculty, staff, and students are expected to adhere to this policy/respect names and pronouns and failure to do so may be addressed by AHR/OER/DOS/etc.

There needs to be an easy-to-access place that provides information on how to update your information in a core system.