

UNIVERSITY OF WISCONSIN–SUPERIOR

Policy Subject: **Student Gender Identity Data Policy**
Cabinet Division: **Enrollment Management**
Policy History: New
Effective Date: **October 26, 2016 (approved by Chancellor Wachter)**

I. Background and Purpose

1.1 Policy Statement. The University of Wisconsin-Superior creates an inclusive environment for all individuals regardless of sex, sexual orientation, gender identity, gender expression, age, race, national origin, ethnicity, ability, physical condition, developmental disability [Wis. Stat. § 51.01(5)], military status, marital status, parental status, or any other category protected by law in the execution of its educational programs, activities, employment, daily operations, and admission practices. (Source: <https://www.uwsuper.edu/dos/titleix/index.cfm>)

1.2 Purpose and Scope. The University of Wisconsin-Superior is committed to meeting the needs of the diverse populations listed above. In order to continuously improve programs and services which meet the needs of these populations, it is necessary for the university to collect specific information about the populations. As a part of the UW System Common Application for Admission, prospective students are asked to provide their “gender” and “gender identity.” (This data collection began September 1, 2016.)

This policy describes the parameters which the university will use the data collected and the protections and rights students have when they share this information.

II. Constraints/Protections

FERPA ([Family Rights and Privacy Act](#)) – a federal law designed to protect the privacy of student education records enforced by the Family Policy Compliance Office of the U.S. Department of Education. Gender and gender identity are not directory information and the University will not release information regarding gender or gender identity without a student's written permission to release, unless a valid exception applies.

III. Definitions

Gender. A socially constructed system of classifications that ascribes qualities of masculinity and femininity to people. Gender characteristics can change over time and vary between cultures.*

Gender Identity. An individual’s internal sense of being male, female, both, neither, or something else. Since gender identity is internal, one’s gender identity is not necessarily visible to others.*

Data. Information collected from students about gender and gender identity.

Sex. A medical term designating a certain combination of gonads, chromosomes, external gender organs, secondary sex characteristics and hormonal balances. Because ‘sex’ is usually subdivided into ‘male’ and ‘female’ based on genitalia, this category does not recognize the existence of intersex bodies.*

**Definitions taken from the Heartland Trans Wellness Group and LGBT Resource Center, [Terminology Handout](#).*

IV. Process and Procedures

4.1 Data Collection and Maintenance. On September 1, 2016, the gender identity data fields were incorporated into the [University of Wisconsin Online Application for Undergraduate, Graduate School, International and Special Student Admissions](#). The data is downloaded into the local UW-S Student Information System (SIS) through a secure data transfer.

Beginning October of 2016, currently enrolled UWS students were provided functionality to allow them to maintain gender identity data through their SIS self-service access to their personal record. The Registrar and designees of the Registrar were also provided administrative maintenance access to gender data to accommodate formal request from a Students for accessibility purposes.

4.2 Data Storage. Only the most recently declared gender data identified by the student is stored in the SIS. Historic records are not kept. Campus and UW-System records retention policies dictate how long data is stored both locally and at UW-System.

4.3 Data Access and Security. Individual gender identity data is not classified as “directory information” as defined by FERPA Guidelines and as such, can only be released to outside entities if the student has provided written permission for its release or if valid exceptions apply. The FERPA guidelines also define that data is only accessible to individuals who have an “Institutional need to know.”

For the purposes of individual gender identity data, read only access will be provided to campus staff who have been identified by the Registrar as having Institutional need. These requests will be processed with a security change request ticket submitted to the SIS security officer. (NOTE: Admissions does not have access to gender or gender identity information during the admissions decision process. Also, faculty and other staff do not have access to students’ gender or gender identity.)

Aggregate gender identity data is available to the Institutional Research office for administrative, compliance, and analysis reporting. Gender identity data may only be disseminated in aggregate form to external entities with prior approval from the Chancellor or a Chancellor’s designee.

V. Implementation, Training/Education/Yearly info to students to update, and Evaluation

5.1 Implementation. On September 1, 2016, the [University of Wisconsin Online Application for Undergraduate, Graduate School, International and Special Student Admissions](#) included

questions about gender and gender identity. On October 1, 2016, UW-Superior implemented the option for students to update this information through the self-service mechanism on E-Hive.

5.2 Training/Education. Gender and gender identity privacy is a part of FERPA training for university personnel.

5.3 Evaluation. Policies and Procedures relating to gender identity data collection will be reviewed as needed and modified as necessary for presentation to the Chancellor for approval. The Division of Enrollment Management is responsible for the implementation and evaluation of this policy.

VI. Attachments and Related Information

None