

# Administrative Guidelines for Use of Demographic Information

## I. General Guideline Statement.

RIT may not use Demographic Information unless it has a Legitimate Business Reason to do so and its use does not favor, benefit, or advantage individuals based on a protected category. Demographic Information may not be used to provide additional, enhanced, special initiatives for, or to target members of, any protected category. This prohibition includes, but is not limited to, using Demographic Information to: (1) award scholarships, grants, prizes; (2) hire, promote or select employees for special projects; (3) provide additional benefits, resources, or opportunities such as training, mentoring, or travel; (4) target outreach, recruitment, or retention; or (5) rank, score, or otherwise advantage individuals in competitions, awards, or recognition.

## II. Definitions.

A. **Authorized Use** means a Legitimate Business Reason that does not favor, benefit, or advantage individuals based on a protected category. *See, Authorized Use of Demographic Information, below.*

B. **Demographic Information** means group, class, or category as defined in RIT's Policy Prohibiting Discrimination, Harassment, and Retaliation (C6.0).

C. **External Request** means a request for Demographic Information to be provided to third parties such as accrediting or rating agencies.

D. **Internal Request** means a request for Demographic Information to be used exclusively by an RIT division, department, or college and not shared externally.

E. **Legitimate Business Reason** means a lawful, objective, and rational reason for a decision or action that supports RIT's strategic goals and is free from discriminatory improper motives. Compliance with applicable law is a Legitimate Business Reason.

F. **Publicly Reported** means Demographic Information shared with the public through publicly accessible documents, such as reports made to IPEDS, NYSED, or any other federal or state agency.

## III. Collecting Demographic Information from RIT Community Members.

RIT may collect Demographic Information from individual members of the RIT community. When requesting this information, the communication must clearly state that providing it is voluntary, and individuals will not face adverse action if they choose not to provide it. The purpose for collecting the Demographic Information must also be explained, and any use of the information must comply with these Administrative Guidelines.

## IV. Internal and External Requests for Demographic Information.

RIT publishes Demographic Information in accordance with Integrated Postsecondary Education Data System ("IPEDS"), the New York State Education Department ("NYSED") requirements, and other state or federal agencies. The Demographic Information that is Publicly Reported is maintained by Institutional Research, Data and Analytics ("IR").

Divisions and departments also collect, maintain, and use Demographic Information for Legitimate Business Reasons such as compliance with mandatory reporting obligations, supporting the health and safety of the RIT community, aggregate benchmarking, or evaluating effectiveness of programs and services. Nothing in these Administrative Guidelines prohibits the use of such information for a Legitimate Business Reason.

IR, along with divisions and departments, responds to Internal and External Requests for Demographic Information. Requests for Demographic Information pertaining to faculty, staff, or student data may be fulfilled as follows:

1. Internal Requests for Demographic Information may be honored if the information is Publicly Reported and will be provided only in the format Publicly Reported without reformatting, aggregation, or disaggregation, or the Demographic Information is for an Authorized Use. *See* Authorized Use of Demographic Information, *below*.

2. External Requests for Demographic Information may be honored if the information is Publicly Reported or if it is required by law or regulation. The Demographic Information will be provided only in the format Publicly Reported and will not be reformatted, aggregated, or disaggregated.

3. Internal and External Requests for Demographic Information that is Publicly Reported to IPEDS or NYSED shall be made to IR. Requests for Demographic Information relating to alumni shall be made to the division of University Advancement. Requests for Demographic information relating to trustees shall be made to the Office of the Secretary. All other requests shall be made to the division of Access, Engagement, and Success (“AES”), or the division that maintains the information in furtherance of the Legitimate Business Reason.

A. Authorized Use of Demographic Information.

RIT has determined that certain Demographic Information may be used when the information is not in a Publicly Reported format if the use supports a Legitimate Business Reason. Use of Demographic Information is considered an Authorized Use when used for the purposes outlined in [Appendix A](#).

Requests for additional Authorized Uses not set forth in [Appendix A](#) must be submitted [here](#) or by emailing the Office of Legal Affairs at [ritlegal@rit.edu](mailto:ritlegal@rit.edu). Each request will be evaluated on a case-by-case basis to determine if it serves a Legitimate Business Reason, in consultation with Academic Affairs, AES, Finance and Administration, and Student Affairs. Any approved Authorized Use will be added to [Appendix A](#).

## Appendix A

Authorized Uses of Demographic Information are as follows:

1. When RIT is required to submit the Demographic Information, as part of its compliance obligations, to state and/or federal agencies
2. Third-party surveys that do not identify RIT as the source of information.
3. Third-party surveys may identify RIT as the source of information solely with the explicit prior written approval of the designated vice president. Written consent must be obtained for every instance of third-party survey participation, where RIT is identified as the source of information, irrespective of previous involvement.
4. Institutional rankings when failing to provide the Demographic information would negatively impact RIT's ranking.
5. Institutional Awards and Recognitions deemed in RIT's best interest.
6. Grant or funding applications, or compliance therewith, if omission would result in a loss of funding.
7. Internal dashboards of historical or trend analysis.
8. Accreditation, licensing, or other regulatory applications, when Demographic Information is mandatory, as confirmed by RIT.
9. Targeted marketing efforts designed to raise awareness of RIT, its programs, services, and initiatives, occurring as part of a broader marketing campaign, provided that they do not benefit, favor, or advantage anyone based on their protected category.