



PERSONALLY-IDENTIFIABLE INFORMATION SUBMITTED TO HLC

Guidelines for Institutions and Peer Reviewers

Introduction

Institutions may submit information and documents to HLC that contain personally-identifiable information (PII). HLC defines PII as any information about an individual that allows the individual to be specifically identified. PII includes, but is not limited to: name, address, telephone number, birthday, email, social security number, bank information, etc.

Examples of PII that could be included in institutional information or documents submitted to HLC could include individual student financial receivables (social security numbers or banking information), student health information, employee pay information, employee personal contact information, etc.

In most instances, HLC does not need the PII for evaluative purposes. Disclosure of the PII—for example as the result of information or documents that HLC has shared with public entities for compliance that have been shared by the public entity through an open records request—can result in harm or inconvenience to individuals and may result in fraud or identity theft.

To safeguard the security of the PII and protect the privacy of the PII, HLC requires institutions to redact or identify certain PII that may be included in the information or documents submitted to HLC as part of its Obligations of Affiliation.

Relevant Requirements

As of September 2020, HLC's Policy INST.B.30.020 Obligations of Affiliation, number 12 states:

The institution ensures that any information submitted to the Commission generally will not include unredacted personally-identifiable information (PII). If the institution submits information with unredacted PII because it is necessary for evaluative purposes or otherwise, it will clearly identify the information as such, if applicable.

When submitting information and documents to HLC, institutions are asked to carefully consider whether information or documents containing PII must be included. If the information or documents must be included for evaluative purposes, but the PII itself is not needed for evaluative purposes, institutions should redact the PII where possible.

For example, if submitting the CEO's offer letter with the CEO's personal address, the personal address should be redacted. If submitting a faculty member's CV or resume, the faculty member's personal address should be redacted. If submitting a Provisional Plan or Teach out Agreement with a list of the students affected, the students' names and other identifying information should be redacted.

If redaction of the PII will interfere with the evaluative value of the document, institutions should clearly

identify the document as containing PII. This could be accomplished through a cover page that identifies each instance of unredacted PII within the materials submitted.

For example, information that does not need to be redacted because it would interfere with the evaluative value of the document includes employee or Board member names on meeting minutes.

Institutions are not expected to redact or identify information or documents where the only PII included is employee or Board member names and work contact information.

Information and documents also do not need to be redacted or identified if personal information is de-identified (for example, student financial receivables without student names or bank routing information) or is provided in the aggregate (for example, data on faculty qualifications without individual faculty information).

HLC asks institutions to review the following types of information and documents for PII prior to submitting to HLC:

- Within the Assurance System, within the Evidence File
- Preliminary Information (Eligibility process)
- Eligibility Filing
- Provisional Plans and Teach out Agreements
- Financial Indicators Reports
- Interim Reports
- Focused Visit Report
- Notice Visit Report
- Appeals Documentation
- Federal Compliance Filing
- Additional Location Confirmation Visit Report
- Campus Evaluation Visit Report
- Multi-Location Visit Report
- Multi-campus Visit Report
- Quality Initiative Proposal and Report

- Within the Collaboration Network
- Within SparQ
- Academy Update Reports
- Academy Impact Reports
- Annual Conference Presentation slides or handouts

Peer reviewers are asked to notify HLC when reviewing institutional materials and he or she identifies PII that should have been redacted or identified as PII but is not redacted. HLC will contact the institution for additional follow-up in accordance with policy INST.B.30.020.

Meeting Obligations of Affiliation

Institutions are required to comply with the Obligations of Affiliation at all times. HLC staff may determine whether the institution has violated an Obligation of Affiliation by seeking written information from the institution or scheduling a peer reviewer or staff member to meet with one or more institutional representatives either on-campus or through another appropriate method.

Administrative Probation

An institution that is determined to have not met the Obligations of Affiliation shall be placed on Administrative Probation by HLC's President for a period not to exceed ninety days. During this time the institution will be expected to remedy the situation. HLC will publicly disclose administrative probation on an institution's Statement of Accreditation Status along with the reason for the Administrative Probation.

Questions?

Ask your HLC staff liaison.