DATA GOVERNANCE

I. Policy Section

3.0 College Operations

II. Policy Subsection

3.10 Data Governance

III. Policy Statement

Grand Rapids Community College (GRCC) data governance framework sets standards and provides guidance for effective management of institutional data. Institutional data is used for internal assessment and mandatory reporting as well as the efficient and impactful operation of Grand Rapids Community College. Institutional data must be secure and available to those who are permitted to use it.

GRCC’s data governance framework applies to institutional data upon initial collection and/or creation. All GRCC faculty, staff, students, affiliates, and contractors are responsible for the security and privacy of institutional data.

IV. Reasons for the Policy

Responsible management of institutional data is critical to the work of the institution and required in order to ensure those with official educational or administrative responsibilities are able to access reliable and agreed upon data as well as maintain expected privacy and security.

V. Entities Affected by this Policy

This policy applies to all GRCC faculty, staff, students, affiliates, and contractors.

VI. Who Should Read this Policy

All GRCC employees, students, affiliates, and contractors
VII. **Related Documents**

3.1 Institutional Review Board  
3.6 Records Management  
3.7 Contracting Authority  
6.18 Acceptable Use of Technology  
6.19 Freedom of Information Act (FOIA)  
8.6 The Family Educational Rights and Privacy Act (FERPA)  
14.3 Complaints Regarding Violations of Privacy and Confidentiality (HIPAA)  
Records Retention  
15.1 Personally Identifiable Information  
Federal Grants Data Governance disclosure  
Types of Data Classifications  
GRCC Information Security Program

VIII. **Contacts**  
Policy Owner: Director of Institutional Research (IR)  
Registrar  
Chief Information Officer  
General Counsel  
Director of Grants Development  
Executive Director of Human Resources  
Director of Budget and Business Services

IX. **Definitions**  
- Institutional Data - information created, collected, stored, maintained, transmitted, enhanced, and/or recorded by GRCC in our campus-wide information system and systems using the data for other business functions including, but not limited to, student information, financial information, employee information, and research data.  
- Data Governance Council - cross-functional team comprised of critical data owners and led by the Director of Institutional Research that helps operationalize the directives of executive leadership, provides recommendation to executive leadership on needed efforts, leads data change management efforts, establishes policy and procedures for effective data management, and collaborates to ensure common understanding, security, and responsible usage of institutional data.  
- Data Users - college departments or individuals who have been granted access to institutional data in order to perform their assigned duties and are required to follow data protection policies.  
- Data Dictionary - collection of data terms commonly used across the institution and important details about them including definitions, locations, owners, etc.
X. Procedures

All GRCC faculty, staff, students, affiliates, and contractors are considered data users. They must do the following:

- Immediately communicate any potential data breach to an Information Technology security team member, so the incident may be shared with appropriate college leadership, which may include GRCC’s Data Incident Response Team, Human Resources, and/or other appropriate College personnel.
- Maintain protection of data in accordance with college data security policies.

XI. Forms

IR Survey Request Form
Contractor Agreement
Data access approval form
FERPA acknowledgment form
FERPA addendum

XII. Effective Date

October, 2023

XIII. Policy History

October, 2023 - Policy Implemented

XIV. New Review/Revision Date

October, 2025