
Access and Compliance Policy Manual for Users of Purdue University Development Data

Purdue University
University Development Office

Action Required

You need to read this manual and material available at the referenced websites to understand fully the University Development Office policy on access and appropriate use of University Development data and then sign the attached "Purdue University Development Office Access and Compliance Statement." You can mail or fax the signed form to the Data Steward: Nancy C. Grenard, Director of Information Systems, Development Services, B50 PMU; fax 496-1154. It is your responsibility to have a completed form on file with Development Services in the University Development Office. Failure to comply will result in termination of your access to University Development data.



Purdue University April 2002

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Access and Compliance Statement

University Development Office

Purdue University

Purdue University Executive Memorandum C-34 (Data Security and Access Policy Statement) contains the following: *Purdue University maintains administrative computing resources including data and information that are essential to performing University business. These are University assets over which the University has both rights and obligations to manage, secure, protect, and control.*

All University employees with an access ID have inquiry access to core data (i.e., data used by multiple University departments or by a single department across multiple business functions) on a need to know basis, without restriction or prior authorization, for use in conducting University business, except in those instances where legal, ethical, internally-imposed, or externally-imposed constraints require restricting access to certain specific data. Employees requiring access to restricted data are assigned specific access codes which they are responsible for protecting from misuse.

The employee's need to access data does not equate to casual viewing. It is the employee's obligation, and his/her supervisor's responsibility, to ensure that access to data is only to complete assigned functions.

The Senior Vice President for Advancement in recognition of the right to privacy of donors to Purdue University, ethical considerations, and the need for good donor relations has categorized University Development data as **restricted**. Data and information available in Advance C/S, the University Development imaging system, and in related reports and files is the property of Purdue University and its use is governed by federal, state, and University regulations. It may be used only to support University-sponsored or University-approved development or alumni relations functions.

The Purdue University Development Office expects that individuals with access to Development data understand their responsibilities with respect to use, interpretation and distribution of that data and the consequences for misuse of data. The ability to produce appeals, reports, and mailings does not constitute automatic authority to do so. Unauthorized release or use of development information for any purpose is strictly prohibited and may result in suspension, and/or termination of employment for the employees involved. Additional legal action may be taken, when warranted.

If a caller/visitor seeking information identifies him/herself as a member of the media, or if it is suspected that the person is a member of the media, the person should immediately be referred to the Office of the Vice President for University Relations at 494-2085.

POLICY ON USE AND RELEASE OF DONOR AND ALUMNI INFORMATION

This policy is issued by the Office of the Senior Vice President for Advancement. It is applicable to all campuses and all facilities of Purdue University and all users of University Development data and systems.

For clarification, information has been divided into two categories: donor information - that which facilitates fundraising, and alumni information - that which facilitates contacts and directories for alumni relations purposes. Two sections follow; it is important that users of University Development data and systems read, understand, and comply with both sections.

DONOR RELATED INFORMATION

- A. GENERAL STATEMENT. Donor information shall not be released except as permitted under this policy or as required by law.
- B. DEFINITION OF DONOR INFORMATION. Donor information is defined as the name, address, telephone number, gift history, or any other information pertaining to a donor or potential donor to Purdue University, which is gathered or maintained by the University Development Office, a development office of any school or unit within Purdue University, or any other University employee for development purposes.
- C. ACCESS AND USE OF DONOR INFORMATION AND SYSTEMS. Donor information and systems may be accessed only by University and Purdue Alumni Association employees who have been authorized to use such systems and information, who have read this document and have signed the Purdue University Development Data Access and Compliance Statement, and who have a need to know in order to perform an authorized University function or activity. Donor information shall be used solely for development and alumni relations purposes in accordance with applicable policies.
- D. REQUESTS FOR DONOR INFORMATION. Requests for exceptions require the approval of the Senior Vice President or his designee. Requests made under the provisions of the Public Records Law will be forwarded to the Public Records Officer, as outlined in Executive Memorandum C-2.
- E. CONTRACTED DONOR SERVICES. The University Development Office shall provide donor information to vendors under contract with the University. Such services might include geo-demographic screening and other prospect research methods.

All vendor arrangements must be pre-approved by the University Development Office and all contracts must be negotiated through the University Contracting Group and the Purchasing Department and must be signed by those authorized to negotiate contracts on behalf of Purdue University for University data release. This will ensure

that contract terms include reasonable and achievable delivery dates and data formats, and that the release of information does not compromise the confidentiality or integrity of the data. Contracts signed by others or without this involvement will result in delays and may result in unfulfilled deliverables. University data will not be released without an appropriately-executed contract. Purdue donor data released for one purpose must not be re-used for another purpose and must be destroyed in a confidential manner when it is no longer needed.

- F. NONCOMPLIANCE. Failure to comply with this policy may result in denial of future access to donor information and systems or other disciplinary action, up to and including, termination. Additional legal action may be taken, when warranted.

ALUMNI RELATED INFORMATION

- A. GENERAL STATEMENT. Alumni information will not be released except as permitted under this policy or as required by law.
- B. DEFINITION OF ALUMNI INFORMATION. Alumni information is defined as the name, address, telephone number or any other information pertaining to an alumnus/a of Purdue University, which is gathered after the individual is no longer enrolled as a student.¹
- C. ACCESS AND USE OF ALUMNI INFORMATION. Alumni information may be accessed only by Purdue University or Purdue Alumni Association employees who have a need to know in order to perform a University-authorized function or activity. Alumni information shall be used for alumni relations or development purposes only.
- D. RELEASE OF ALUMNI INFORMATION WITHOUT PRIOR PERMISSION BY UNIVERSITY DEVELOPMENT OFFICE. Authorized users of alumni information will be guided by the following with respect to requests for alumni information without prior permission of the University Development Data Steward:
1. Confirm Degrees. All requests for confirmation of degree information should be referred to the Office of the Registrar.
 2. Mailing Address Release. Requests for current address information for alumni will be satisfied except where an alumnus/a has specifically requested that his/her directory information be restricted.
 3. Forward Mail. Requests for address information for alumnus/a who has requested that directory information be restricted should be forwarded to the alumnus/a being sought.²

¹ Student records are subject to the federal Family Educational Rights and Privacy Act. The Office of the Registrar is responsible for implementing University policy on access to student records.

² The University Development Office or the Purdue Alumni Association reserves the right to charge to recoup incurred postage costs to the extent allowable.

4. Phone Numbers and E-Mail Addresses. Purdue is sometimes given phone number and e-mail information even when the phone number is unlisted or the e-mail address is not generally shared. In these cases, the information is not always coded as unlisted in the database. Neither the phone number nor e-mail address should be released. The person making the request can call directory assistance once he/she has the home address information. If the phone number is unlisted, directory assistance will not release it; if it is public, the information will be released. In addition, there are "look-up" services via the web that have files of phone numbers and e-mail addresses available (e.g., www.switchboard.com).
 5. Other Biographic Information. Requests for information about family members, employers, alumni activities shall not be satisfied without approval of the alumnus/a.
 6. Associated Organizations. Alumni information may be released to organizations associated with the University, only if the organization submits a copy of any information, survey, or letter to be mailed and certifies in writing that:
 - (i) Such alumni information will be used only in an activity that will directly serve a function of the University. For student-related organizations, the Vice President for Student Services or his/her designee must certify that the use of the requested alumni information will serve a University function. The University Development Office will have the final authority to determine if an activity will directly serve a function of the University.
 - (ii) It will not use the information for any other purpose (this includes using the information to build or augment a separate database without the alumni included giving specific, individual permission for the associated organization to maintain their names and contact information).
 - (iii) It will not release or disclose the information to any third party. It will not release the information to a person affiliated with the organization unless that person has a need to know and that person agrees to maintain the confidentiality of the information pursuant to these guidelines.
 - (iv) The organization agrees to return to Development Services or securely destroy all copies and/or versions of the alumni information in whatever form received or maintained (except what alumni contacted have specifically granted the organization permission to use or maintain) once the activity is completed.
- E. CONTRACTED ALUMNI SERVICES. The University Development Office shall provide alumni information to vendors under contract with Purdue University or Purdue Alumni Association. Such services might include alumni directories, resume referrals, affinity cards, tours, etc.

All vendor arrangements must be pre-approved by the University Development Office and all contracts must be negotiated through the University Contracting Group and the Purchasing Department and must be signed by those authorized to negotiate contracts on behalf of Purdue University for University data release. This will ensure

that contract terms include reasonable and achievable delivery dates and data formats, and that the release of information does not compromise the confidentiality or integrity of the data. Contracts signed by others or without this involvement will result in delays and may result in unfulfilled deliverables. University data will not be released without an appropriately executed contract. Purdue alumni data released for one purpose must not be re-used for another purpose and must be destroyed in a confidential manner when it is no longer needed.

F. **RELEASE OF ALUMNI INFORMATION WITH PRIOR PERMISSION.** Alumni information may be released in the following circumstances only with the prior written permission of the alumni:

1. Shared Alumni. The University Development Office and Purdue Alumni Association will release alumni addresses and telephone numbers to other institutions of higher education on shared alumni if the alumnus/a gives permission in response to a forwarded written request.
2. Recruiting Firms. Requests from management recruiting firms will be forwarded to the appropriate unit's placement office for service as authorized by its alumni clients.

G. **RELEASE OF ALUMNI INFORMATION UNDER OTHER CIRCUMSTANCES.** Other requests for alumni information should be referred to the appropriate University office as follows:

1. Media Requests. If a caller/visitor seeking information identifies him/herself as a member of the media, or if it is suspected that the person is a member of the media, the person should immediately be referred to the Office of the Vice President for University Relations at 494-2085.
2. Law Enforcement Agencies. Requests from law enforcement agencies for alumni information should be directed to the Vice President for Business Services / Public Records Officer.
3. Subpoena or Court Order. Requests made by court order or subpoena should be directed to the Vice President for Business Services / Public Records Officer.
4. All Other Requests. All other requests for alumni information from persons or entities should be directed to the University Development Data Steward or his/her designee at devinfo@purdue.edu. Requests of a "public records" nature will be forwarded to the Public Records Officer by the Data Steward.

H. **NONCOMPLIANCE.** Failure to comply with this policy may result in denial of future access to donor and alumni information or other disciplinary action, up to and including, termination. Legal action may be taken if warranted.

POLICIES ON USE OF DONOR AND ALUMNI INFORMATION

FOR SOLICITATION AND MARKETING PURPOSES

Successful fundraising requires shared information, open communication, and cooperative participation by all concerned. Coordination of solicitation practices results in achieving high levels of donor satisfaction and in obtaining the largest possible gifts in support of University priorities. Development officers and University staff are required to handle donor records and other sensitive information in a professional manner respecting the privacy rights of all alumni, donors and friends of the University to the fullest extent permitted by law, being mindful of the donor relations implications, and considering the potential legal ramifications for the University.

ACCESS

- A. The reader is referred to University Development Policy Manual regarding the access to University Development systems and data which can be found at:
<http://www.purdue.edu/udo/info/UDOManual/infoacccs/index.htm>
- B. Authorized users receiving password-protected access to the development and alumni database (Advance C/S) or to the web-accessible report or utility systems (Report Wizard, Acknowledgement Wizard, etc.) will have the ability to access data appropriate to their responsibilities.
- C. Staff who will be authorized to use these data and systems are:
 - University and Alumni Association employees whose primary responsibilities are in support of University fundraising or alumni relations activities, and
 - Those who work within University Development-recognized school/campus/unit offices. These individuals should focus their attention on the records of those University alumni who are alumni of their unit and to the records of donors and friends of their unit.
- D. Neither access nor ability automatically constitute authorization for solicitation or for marketing purposes.
- E. Existing policies for annual giving solicitation programs regarding prospect selection will continue to govern annual solicitations. The Prospect Management Policy available at <http://www.purdue.edu/udo/info/UDOManual/solicit/prosmngt.htm> will continue to guide major gift prospect activities.
- F. NONCOMPLIANCE. Failure to comply with the Annual Giving and Prospect Management policies may result in denial of future access to donor and alumni information and other disciplinary action, up to and including, termination.
- G. Purdue University Executive Memorandum B-63 which outlines the Policies and Procedures for Solicitation of Gifts is available at:
<http://www.adpc.purdue.edu/VPBS/b-63.htm>

ANNUAL GIVING SOLICITATION POLICY

A. DEFINITION OF ANNUAL GIVING PROGRAMS.

1. Annual Giving programs are conducted to solicit outright gifts of cash (or equivalent, including securities) for designated restricted and unrestricted accounts/allocations.
2. Most often, Annual Giving programs utilize direct marketing techniques (mail, telemarketing, etc.), are aimed at large constituency groups, and generate individual gifts of less than \$10,000.

B. ALUMNI. Departments, schools, and campuses may solicit and market to the alumni of their respective units for annual giving programs. A unit may not solicit alumni of other units unless the alumni have degrees from both units, have a record of participation with the unit, or are donors to the soliciting unit.

C. DONORS. Units may solicit and market to their existing donors for annual giving programs and other marketing programs, regardless of the donors' alumni status.

D. FRIENDS. A unit may solicit and market to an individual who has been identified and coded as a friend of that unit regardless of the prospect's alumni status. A friend is someone who has identified him/herself to the unit as having an interest in that unit, has financially supported, or has affiliated him/herself with the programs and services of the unit in some documented manner.

E. NON DEGREE-GRANTING UNITS. Non degree-granting units may not solicit alumni of degree-granting units for ongoing annual support or for marketing activities unless the alumni are donors, former participants, or friends of the unit.

H. SPECIAL PROJECTS. Any broad-range, special purpose, annual-type solicitation which will include alumni outside of regular department, school, or campus annual giving projects, whether proposed by a degree-granting unit or a non degree-granting unit, must be reviewed and approved by Annual Giving before the unit initiates the project.

I. DEPARTMENTS. Departments must coordinate solicitations with the main development office of their school or campus.

J. REVIEW PROCESS. All materials used in solicitations, including letters, are to be reviewed by Annual Giving prior to printing. The coordination process must be started early in the project to avoid delays in mailing.

K. Purdue University Executive Memorandum B-63 which outlines the Policies and Procedures for Solicitation of Gifts is available at:

<http://www.adpc.purdue.edu/VPBS/b-63.htm>.

MAJOR GIFT PROSPECT SOLICITATION COORDINATION POLICY

- A. DEFINITION OF PROSPECT MANAGEMENT. The systematic process of managing and tracking contact and activity with Purdue's major donor prospects.
- B. GOAL OF PROSPECT MANAGEMENT. The goal of Prospect Management is to match donor interests with University needs as defined by the president in collaboration with the senior vice president for advancement and school/program heads. The senior vice president for advancement is charged with implementing and managing the University's fund-raising initiatives (Executive Memorandum B-63) and, in consultation with program heads (e.g., deans, chancellors, directors, department heads), identifying prospects³ whose interests and financial capacity have the greatest likelihood of strategically meeting University fund-raising goals. It is the prerogative of program heads, in collaboration with the senior vice president for advancement, to identify and manage fund-raising initiatives at the program⁴ level.
- C. OBJECTIVES OF PROSPECT MANAGEMENT ARE:
- Serve prospect/donor interests;
 - Support Purdue's fund-raising initiatives efficiently, systematically, and equitably;
 - Identify and enhance resources and services available to Purdue's fund-raising staff;
 - Enable and encourage active communication among Purdue's development community; and
 - Provide staff with accurate measures of performance and accountability.
- D. PROSPECT MANAGEMENT POLICY can be found at
<http://www.purdue.edu/udo/info/UDOManual/solicit/prosmngt.htm>
- E. Purdue University Executive Memorandum B-63 which outlines the Policies and Procedures for Solicitation of Gifts is available at:
<http://www.adpc.purdue.edu/VPBS/b-63.htm>

³ Prospects - Households, organizations or any combination thereof which constitutes the focus of a fund raising initiative

⁴ Programs - University units which engage in significant fund raising activity (e.g., schools, departments, regional campuses)



Purdue University

University Development Data Access and Compliance Statement

PURPOSE: By signing this form you certify that you

- have read and understand Purdue University's Access and Compliance Manual for Development Data Users and/or
- have attended the Data Access and Compliance briefing
- and**
- that you agree to abide by applicable state and federal laws and University policies that apply to the proper use of data.

RESPONSIBILITY: The granting of access carries with it an implicit bond of trust that you will:

- Not use the data or systems for personal gain or to facilitate the personal gain of others.
- Access development data and systems only as required to perform your assigned duties.
- Be a responsible user of data, whether it is data relating to your own unit or another unit.
- Store data that you obtain from these data sets under secure conditions.
- Make every reasonable effort to maintain privacy and security of data.
- Not update nor modify data beyond that which you have been authorized to maintain.
- Make every reasonable effort to interpret the data accurately and in a professional manner – including attending appropriate training sessions.
- Dispose of all data in all media in a secure fashion.
- Not share your system access.

VIOLATIONS: Misuse of the data in or from these data sets will subject you to disciplinary action as described in the University Development Access and Compliance Statement and as covered in the Data Access briefing that is required for new users of these data.

CERTIFICATION:

_____ I have attended the mandatory briefing on _____.
(date)

_____ I have read and understand Purdue University's Access and Compliance Manual for Development Data Users

_____ I understand and accept my obligations as a responsible user of the data to which I have been granted access.

Name: _____

Signature: _____ Date _____

Title: _____ Dept/Unit: _____

Address: _____ Campus phone: _____

Your Copy - Submit Form on Page 12

Suggested Reading and Miscellaneous References

Purdue University Executive Memos

- # C-2 <http://www.adpc.purdue.edu/VPBS/c-2.htm>
- # C-10 <http://www.adpc.purdue.edu/VPBS/c-10.htm>
- # C-34 <http://www.adpc.purdue.edu/VPBS/c-34.htm>
- # B-63 <http://www.adpc.purdue.edu/VPBS/b-63.htm> (soon to be revised)

Management Information's Administrative Computing Security Policies

<http://www.adpc.purdue.edu/mi/WL/Security/web/security/security.htm>

UDO's Policy Manual

<http://www.purdue.edu/udo/info/UDOManual/>

AFP's Code of Ethical Principles and Standards of Professional Practice

<http://www.afpnet.org/ethics>

(Note: the Association for Fundraising Professionals (AFP) was formerly known as National Society of Fund Raising Executives (NSFRE))

CASE's Donor Bill of Rights

<http://www.case.org/about/donor.cfm>

CASE's Mission and Statement of Ethics

<http://www.case.org/about/mission.cfm>

<http://www.case.org/about/ethics.cfm>

APRA's Statement of Ethics

http://www.aprahome.org/apra_statement_of_ethics.htm