Policy 3.2
Information and Records Release Policy

Responsible Official: VP for Development & University Relations
Administering Division/Department: ACE (Donor Records System)
Effective Date: March 12, 2008
Last Revision: July 16, 2018

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Overview

The records information release policy for the Office of Development and Alumni Relations (DAR) provides governance on the release of information on alumni and other constituents of Emory University.

The Office of Development Operations for DAR maintains a database (AWA) of biographical and gift/pledge information about University alumni and other constituents in accordance with the general needs and expectations of the University community. The information contained in this database is intended exclusively for purposes related to Emory’s programs and should be treated as confidential.

It is the policy of Development Operations for DAR to support the ongoing activities of Emory University by providing information on alumni and constituent records that provide assistance for programs, communications, and events which bring together alumni, donors, and constituents of the University, to those with legitimate needs as outlined in the procedures, and at the same time maintain the confidentiality of the information entrusted to Emory by our alumni and constituents.

Policy Details

I. The following may request information from AWA:

A. University departments and alumni constituent groups, in support of approved activities (see list of approved activities below). Those departments and constituent groups include but are not limited to:

1. The Emory Alumni Association (EAA)
2. Alumni constituent groups chartered under the EAA
3. Office of Development and Alumni Relations
4. Administrative units of Emory University
5. Academic units of Emory University
6. Athletic units of Emory University
7. Central Administration
8. Career Development Center(s)

In cases of dispute about whether a constituent group may receive information from AWA, the final decision will rest with the Senior Vice President for Development and Alumni Relations or his/her designee.

School-based departments external to Development and Alumni Relations should submit requests for alumni and constituent information to the development office responsible for that area (e.g., Jewish Studies should coordinate requests...
with Emory College development). Non-school departments without a designated development or alumni relations offic er (e.g. Religious Life, Women’s Studies) should coordinate requests with the EAA.

B. Other colleges and universities seeking the location of alumni with degrees from both Emory University and the requ esting institution.

C. Law enforcement agencies and student loan agencies (requests must be routed through the General Counsel for ap proval).

D. Agencies that assist Development Operations in locating Emory University’s lost alumni (e.g., USPS Locator Ser vice).

E. Alumni seeking information on other alumni via telephone. If an alumnus/alumna has internet access, advise th e requestor to authenticate themselves by using the alumni online directory. Inform the requestor that the onli ne directory will provide the information they need to contact other alumni. If an alumnus/alumna does not ha ve internet access, request that they establish their status by providing their date of birth, social security num ber, or student ID (in the case of alumni) as well as their current mailing address and any other uniquely identi fying data housed in the database record. Alumni may request public information for up to three individuals. R equests for public information for more than three individuals must be made in writing, stating the reason for t he requested information. In general, contact information on more than three individuals constitutes a list and should only be provided to alumni serving in a volunteer capacity for Emory University. Requests in writing for lists of alumni must be approved by the EAA. Staff may, at any time, require a written request from any individ ual if they feel unsure about the request.

F. National organizations for authorized student organizations (e.g., fraternities, sororities, honor societies).

G. All requests from anyone else (those who can’t establish their status) seeking information on another per son will be forwarded to that person so that he/she can decide whether or not to contact the requestor. No inf ormation will be released for those records coded “Information Suppress”, “FERPA Request to Suppress Inform ation”, or “Inactive” indicating the alumnus or alumna has requested to not have their information released, o r has requested no University contact.

H. All requests for information from members of the media must be referred to the Office of Media Relations or similar professional school office.

II. The following is information that may be released from AWA:

A. Information available for release is confined to "public information" which is limited to:

1. Full name
2. Address and telephone number
3. Degree(s) and date of degree(s) awarded by Emory University
4. School(s) from which degree(s) was/were granted with major field of study
5. Employer address and telephone number
6. E-mail address
7. Fax number(s)

"Public information" will be provided only to those requestors identified in I. (A) through I. (F) in section I.

The Family Educational Rights Privacy Act (FERPA) severely restricts the amount of information that may be released o n current students. No information on students will, therefore, be released based on data maintained by Development Operations. All requests for information on current students should be forwarded to the appropriate Registrar’s office.

Information provided to volunteer alumni constituent groups will be limited to those alumni who are affiliated w ith the requesting group.

B. In addition to “public information,” requests from the EAA, development, administrative, academic, or at heteric units of Emory University and Central Administration will be provided the following information:

1. Employment
2. Student activities
3. Alumni activities
4. Family members
5. Degrees obtained from other Schools
6. Miscellaneous comments, awards, text, etc.

7. Gift/Pledge data

III. The following statements specify the acceptable internal uses of information from the alumni database:

A. Development Operations will make available information from its database for the support of approved, University-related activities. Approved activities include the following:

1. Alumni relations
2. Development
3. Public relations
4. Government relations
5. School/department communications to alumni/constituents
6. University-sanctioned research
7. Continuing education programs
8. Student recruitment

In cases of dispute about what constitutes an approved activity, the final decision will rest with the Senior Vice President for Development and Alumni Relations or his/her designee.

B. If development or alumni relations activity is going to occur with the information provided by Development Operations, the school or unit using that information must coordinate that activity with the appropriate development office or the EAA. Since information is constantly being updated in AWA, the school or unit using any information provided must use the data within two weeks of receiving the data (for a mailing or contract). Any information provided by Development Operations should be used only once for the specific activity the information is supporting.

C. Information maintained by Development Operations is not available for release for non-related commercial or political purposes.

D. If the information provided will result in the preparation of lists or directories that are to be published in book, magazine, newsletter or other forms for general distribution among alumni groups, prior to publication each individual who might be included must be provided the opportunity to indicate in writing whether he/she wishes to be excluded.

E. Requestors of data from Development Operations may contract the services of outside vendors (e.g., data processing consultants, direct mail firms, and marketing and merchandise firms) to process and/or distribute information obtained from Development Operations. In these cases:

1. The vendor must agree to use the information only for the purpose intended by the University client. The sale or transfer of the information by the vendor is strictly prohibited.
2. If the project in question results in the publication of directories or lists as identified in III.(D) above, the procedures outlined in III.(D) must be followed prior to publication.
3. The vendor must ensure the prompt return of any University owned computer tapes or electronic software provided in fulfillment of the contract.
4. The University client or the vendor agrees to pay any costs associated with systems programming or special data processing that might be required beyond the normal capabilities of Development Operations computer systems.
5. In all cases involving the use of outside vendors or contractors, the absolute confidentiality of the information provided from the alumni database is the responsibility of the requestor. A vendor confidentiality agreement must be signed by the third party and kept on file.

IV. Formats available for distribution of information

Information may be obtained in the form of lists (comma separated value files), labels, or other forms of hard copy by authorized university representatives in support of approved activities as noted in III.A of this document. It is the responsibility of the unit requesting information to maintain the absolute confidentiality of that information as specified in this policy statement.

V. Compliance with the above policy

Failure to abide by any of the policies stated within this document may result in denial of access to information co
Requests for public information external to DAR will not include information on records in which the constituent has specifically requested that his or her contact information be suppressed.

Gift and pledge-related information on Emory’s donors should not be released to volunteers or other third-parties involved in fundraising or alumni relations activities unless absolutely critical to the project, and even then only in cumulative form or by listing the areas they support and not necessarily the amount. Release of gift and pledge information will require the approval of the Vice President for Development.

Related Links

- Current Version of This Policy: http://policies.emory.edu/3.2

Contact Information

<table>
<thead>
<tr>
<th>Subject</th>
<th>Contact</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clarification of Policy</td>
<td>Josh Greenbaum</td>
<td>404.712.2020</td>
<td><a href="mailto:josh.greenbaum@emory.edu">josh.greenbaum@emory.edu</a></td>
</tr>
</tbody>
</table>

Revision History

- Version Published on: Mar 29, 2007
- Version Published on: Mar 29, 2007 (Original Publication)

Emory University policies are subject to change at any time. If you are reading this policy in paper or PDF format, you are strongly encouraged to visit policies.emory.edu to ensure that you are relying on the current version.