Project Summary
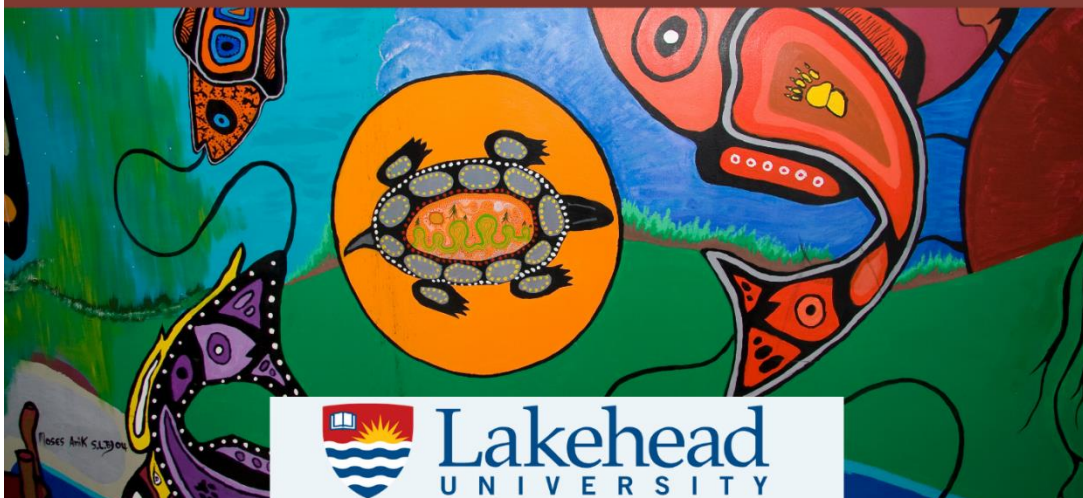
Exploring Indigenous transfer students data sharing feasibility between Northwestern Ontario institutions

Project Lead: Denise Baxter, VP Indigenous Initiatives, Lakehead University

Lakehead UNIVERSITY

Preamble

The purpose of this report is to demonstrate that a larger scale collaborative research project between multiple institutions in northwestern Ontario is feasible. The follow tables contain responses from all institutional partners to the questions co-created by the Ontario Council for Articulation and Transfer (ONCAT) and the Project Lead.

This ONCAT project was was completed with many of the same partners and timelines as the ONCAT funded project (S2018: An Inventory of Preparatory Credentials in Northwestern Ontario) which included Seven Generations Indigenous Institute, Confederation College, Oshki-Wenjack Education Institute and Lakehead University. The process of sharing aggregated data while discussing the viability of a larger data sharing and analysis initiative was synergistic in nature and our collective representatives were enthusiastic about future initiatives that involve collaboration and data sharing related to student mobility.

Methodology

The project was opened with a group meeting over Zoom where all partners were invited to participate. The Office of Institutional Planning and Analysis at Lakehead University generated initial responses to all of the data feasibility questions that were reviewed and edited through three successive iterations in collaboration with the internal team at Lakehead. These initial responses were then shared with all institutional partners to provide additional context considerations and validation of their institutional processes.

The Project Coordinator facilitated formal and informal key informant interviews with senior administration, Admissions, and Institutional Planning and Research staff members at every partner institution.

All responses from every institution were made available to the project partners in advance of this final report for review and refinement.

Institutional Responses to Data Access Feasibility

Sharing Unique Student Identifiers

Is the institutional research board (IRB) at each college/institute/university required to "sign off" on the project prior to the sharing of student records containing unique identifiers (e.g. names, OEN)? If no IRB exists at an institution, what is the equivalent process to ensure ethical guidelines are followed	
Lakehead University	Lakehead University does not currently share unique identifiers between institutions, per guidance from the Director, Risk Management and Access to Information at Lakehead University. Specifically, the University's main "collection notice" does not cover use of personal information for research purposes by a third party. Currently, data requests are aggregated to remove unique identifiers. Lakehead University does have a research ethics board, but this type of request would likely not require REB approval. Typically, when student mobility projects require data the Research Ethics Board officer reviews the request and if the data is being used for evaluation purposes an Evaluation Waiver is issued.
Confederation College	Confederation College does not share unique identifiers between institutions as guided by their Institutional Research and Planning policy and signatories. Confederation College has a REB. Aggregated data requests with no unique identifiers can, in certain instances, be shared without a REB review.
Oshki-Pimanche-o-Win	Oshki adheres to privacy legislation and guidelines. At this time, sharing data with unique identifiers requires the express consent of each individual student and Oshki does not share data outside of reporting to Ministry funders. Oshki uses Ministry's (MLTS) "collection notice" form. Student level & enrollment data is provided to the Ministry (ARMS software database). Also, MCU enrollment data is submitted to them but does not include any student-level information.
7 Generations	Seven Generations Education Institute (SGEI) is in the process of establishing policy and procedure to support the work of a SGEI REB that is responsive to community needs and accountable to Anishinaabe protocols and understandings of research. In the absence of a REB, SGEI uses Consent to Information Sharing forms collected during student registration, which stipulates that only non identifying information will be shared outside of the organization, with the exception of information sharing for the admissions process. Currently, the decision of what constitutes "non identifying information" is agreed upon by our program directors.

Signing Authority

What individuals have the signing authority (e.g., VP academic?) to make such data available within each college/institute/university?	
Lakehead University	A request would need approval from the following individuals: Dr. Millo Shaw (Director, Risk Management and Access to Information) Dr. Heather Murchison (Vice-Provost, Institutional Planning and Analysis) Dr. David Barnett (Provost and Vice-President, Academic) Andrea Tarsitano (Registrar and Vice-Provost Students)
Confederation College	A request would need approval from the following individuals: Neil Cooke (Vice President – Academic) Don Duclos (Registrar)
Oshki-Pimanche-o-Win	A request would need approval from the following individuals: Vice President (Kim Falcigno) Academic Director (Susan Sinclair)
7 Generations	The following individuals are able to approve sharing of data concerning post-secondary enrollment, attrition, achievement and pathways: Brent Tookenay (CEO) Angela Mainville (Director of Post-Secondary Education)

Data Sharing Processes

	Do data-sharing exercises such as these require formal review/approval from the Freedom of Information and Protection of Privacy (FIPPA) office, privacy office or officer at each college/institute/university? What security requirements will they impose on the digital and physical infrastructure eventually used to store shared data?
Lakehead University	Data-sharing exercises would require review and approval from the Risk Management and Access to Information office at Lakehead University. The security requirements must comply with section 10(1) of Ontario Regulation 460 (https://www.ontario.ca/laws/regulation/900460) and must complete and submit to you the "Security and Confidentiality Agreement of Personal Information for Research Purposes" (http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/FormDetail?OpenForm&ACT=RDR& TAB=PROFILE&SRCH=&ENV=WWE&TIT=Security+and+Confidentiality+ Agreement+of+Personal+Information+for+Research+ Purposes&NO=002-5208E).
Confederation College	These exercises would need to be reviewed and approved by the Registrar and Director of Operational Effectiveness.
Oshki-Pimanche-o-Win	There is no formal review/approval process or privacy officer for these types of requests at Oshki. All privacy roles are currently managed by the Directors.
7 Generations	No formal review/approval process exists. These decisions are made by program directors in consultation with corresponding registrar personnel, as we have a Post-Secondary Registrar Office and a separate Secondary Registrar Office.

Legal Counsel

	Is legal counsel at each institution required to review any project documents?
Lakehead University	Official records, institutional contracts (MOUs), non-disclosure agreements that require sign-offs or legal obligations that bind the university require legal review. Legal review is not required for transitory records such as the final reports, aggregated data, REB approved research requests.
Confederation College	Legal counsel is required at the discretion of the Registrar and the Senior Administration team. Contracts are reviewed on a case by case basis.
Oshki-Pimanche-o-Win	We do not employ legal counsel for data related requests, at this time.
7 Generations	Legal counsel is not required to review project documents pertaining to making data available outside the organization.

Limitations in Data Sharing

Are there any limitations on the sharing of data that would be imposed by any of the abovementioned actors?	
Lakehead University	Limitations to data sharing are determined, generally, by the Office of Institutional Planning and Analysis. Privacy and This includes: legal considerations, student privacy, the intended use of the data, the data granularity (i.e. aggregated vs. non-aggregated), political, environmental and social considerations
Confederation College	Limitations to data sharing are determined first by the Registrar's Office followed by the Office of Institutional Research and Planning who would assess the level of detail in data in relation to the intended receiver of the data.
Oshki-Pimanche-o-Win	Yes, we intend to regulate data sharing as we develop institutional processes related to these types of requests.
7 Generations	Currently, limitations are at the discretion of program directors who hold obligations to student, staff and contractor privacy on behalf of SGEI at the grace of the SGEI Board of Directors. Formal processes and procedures supported by policy will be established according to community needs and accountability to Anishinaabe protocols and understandings of possible implications for data sharing in order to ensure the use of the data benefits SGEI students.

Request Approvals

In what order do each of the abovementioned permissions need to be acquired?	
Lakehead University	Approval of this type of data request needs to be provided by the Registrar, the Director, Risk Management and Access to Information, and the Provost and Vice-President Academic prior to it being accepted and initiated by the Vice-Provost (Institutional Planning and Analysis)
Confederation College	Approval of this type of data request needs to be provided by the Registrar and the Vice President (Academic)
Oshki-Pimanche-o-Win	Approval of this type of data request needs to be provided by the Academic Director, prior to being accepted and initiated by the Vice President.
7 Generations	Approval of this type of data request needs to be provided by the Director of Post-Secondary, prior to being accepted by the registrar, but can be initiated by any program director or the CEO.

Previous Projects and Templates

Is there a precedent for this sort of work at any of the institutions? And, if so, are copies of the documents listed below available to be used as templates	
Lakehead University	Lakehead University has precedent for this type of work through other formalized partnerships. Aggregated data requests with no identifying information have been shared for other pathway development projects for internal administration purposes only. If a project requires contacting students or is considered as Research involving Human Subjects then a REB review is required. The researcher submits a REB application (attached) and this is reviewed by the board. When administrative staff or academic staff engage in program evaluation and want to use variables that are more likely to lead to identification of the students/sample the REB may issue an "Evaluation Waiver" whereby the party requesting a data summary can bypass REB review. Typically the data requested is stripped of identifying information and must have a sample size of 5 of more. We have attached a Research Ethics Board agreement template and an "Evaluation Waiver" template to the Final Report package in the ONCAT portal.
Confederation College	Confederation College and Lakehead University have engaged in data-sharing agreements in the past through ONCAT funded projects. Typically, these agreements contain data aggregated internally before being shared.
Oshki-Pimanche-o-Win	We have a general confidentiality agreement for all staff/instructors. In some cases instructors have access to student information systems at both OSHKI and partner institutions.
7 Generations	Previous projects include economic viability reports and operational/facilities costs analysis, all contracted to outside consultants. These agreements/contracts are not available to be used as templates and are not exclusively related to student data.

Common Identifiers

Do the desired data sources across institutions contain a common set of unique identifiers (e.g., OEN) or foreign key fields that can be used to join records? i. If so, what are these, and what is their availability across years?	
Lakehead University	All students have an OEN which is collected by Lakehead University. However, datasets within the institution leverage the Lakehead University specific student ID, given the potentially small number of transfers occurring in certain pathways.
Confederation College	All Confederation College students have an OEN however we have no reporting and have not, historically, done local research based on the OEN numbers.
Oshki-Pimanche-o-Win	Data fields available to Oshki include the OEN number, name, date of birth, and partner college/university student number.
7 Generations	SGEI collects and stores OENs and partner institute student ID numbers, but doesn't share this information. An SGEI specific student number is also generated for electronic identification of students in the SIS and LMS, which is not shared outside the organization.

External Data Sources

For data sources external to the participating institutions (e.g., OUAC, OCAS), indicate how viable it is for the project team to gain access to the data in the timeline feasible for the project.	
Lakehead University	Institutional Planning and Analysis requires additional information on the specific fields being requested in this project to predict a specific timeline. Depending on the nature of the request and internal capacity, the Office of Institutional Planning and Analysis attempts to respond to these types of requests within 4 weeks.
Confederation College	OCAS data extraction is possible based on need and can be complemented by our internal student information system data. To predict a timeline, we would need specific data requirements.
Oshki-Pimanche-o-Win	N/A. We do not have the capacity to pull data from the OUAC/OCAS systems. Our students apply through these portals to the partner institutions, not OSHKI directly.
7 Generations	Access to the data is dependent on the specific data requested/required for the project. Assuming it is data stored at SGEI, the anticipated timeline is 2 weeks. For data we would need to request from partner institutes, the timeline can't be anticipated until the specific data requirements are approved by the partner institutions, which isn't guaranteed.

Common Data Fields

	Are data field definitions for key variables consistent across institutions, including: *i. Indigenous; Program/Field of Study; Full-time / Part-time status, GPA, Year of Study, Qualification / Credential being sought.* *ii. For transfer student: Previous Program, Previous Institution, Transfer Credit Awarded*
Lakehead University	The following variables are available: Indigenous students • Based on self-identification at Lakehead University • Self-identified through OUAC/OCAS • Enrolled in an Indigenous Transition Year Program (formerly Native Access Program) Full-time and Part-time is assessed based on FTE calculation at each institution • At Lakehead – 0.375 FTE and lower are considered part-time • GPA • Marking schemes/grade scales vary by institutions Previous Program / Previous Institution / Transfer Credit Awarded with various definitions based on data collected in the student's transcript • Some equivalency tables may exist used by the Registrar's Office • Qualification / Credential being sought / Year of Study • Varies by institution • Some standardization through the PFIS-USER Manual developed by Ministry of Colleges and Universities • Use of Previous Institution Codes (OUAC/OCAS code, StatCan code, Institution-Specific Codes) • Transfer Credit Awarded varies by institution and subjective course equivalence evaluations
Confederation College	Most of the data fields listed above (Lakehead University response) are available in our internal data system.
Oshki-Pimanche-o-Win	Partner institutions share student transcripts with OSHKI which may or may not contain some of the data fields listed above. Some of it may be revealed on student transcripts which are shared with Oshki. Registrars at the partner institutions only have access to most this data. Oshki would have to request it from them.
7 Generations	Indigenous students • Self-identified through registration process into SGEI SIS Full-time and Part-time is assessed based on FTE calculation at each institution • Full-time/Part-time is assessed according to partner institute's calculation and determination process • GPA • Marking schemes/grade scales according to processes of partner institute

	Previous Program / Previous Institution / Transfer Credit Awarded with various definitions based on data collected in the student's transcript • Qualification / Credential being sought / Year of Study • Varies by institution • Use of Previous Institution Codes (OUAC/OCAS code, StatCan code, Institution-Specific Codes) • Transfer Credit Awarded varies by institution and subjective course equivalence evaluations

Digital Infrastructure

Do project researchers currently have access to digital infrastructure meeting the specifications of FIPPA/FIPPA offices?	
Lakehead University	The Office of Institutional Planning and Analysis at Lakehead University meets FIPPA data collection and storage practices.
Confederation College	The Office of Institutional Research and Planning and all other offices associated with student data requests meet FIPPA data collection and storage practices.
Oshki-Pimanche-o-Win	Oshki does not have access to any related digital infrastructure at this time.
7 Generations	SGEI students data collection and storage practices meet FIPPA specifications.

Conclusion

During the final group meeting with all project partners in this project, key stakeholders agreed to build on our inter-institutional relationships over the 2021/2022 academic year and submitting a larger scale research proposal to ONCAT for the 2022 Request for Proposals cycle as a result of this work. At the time of this report, we have applied to extend our ONCAT funded work to support Indigenous learners transitioning between our respective institutions. As we build on our current relationships and interweave our inter-institutional networks of professionals and academics our intention is to build a collaborative quantitative research agenda that supports strategic pathway development through sharing variables in our institutional data sets.