Gender Identity in Higher Education
Recommendations for Campus Information Systems
WORKING GROUP PAPER
APRIL 2018
# Table of Contents

- Introduction .......................................................................................................................... 3
- Recommendations ................................................................................................................ 4
  - Multiple Name Types ........................................................................................................ 5
  - Gender-Related Information .............................................................................................. 6
  - Privacy Rights .................................................................................................................. 6
  - Access Rights .................................................................................................................. 7
- Conclusion ............................................................................................................................ 9
- Authors ............................................................................................................................... 10
This paper recommends modern identity specifications for campus information systems that can be used to properly and respectfully handle the gender identities, pronouns, and preferred names of students, faculty, and staff in ERP systems at our institutions.

**Introduction**

The recording, reporting, and use of names, genders, and personal pronouns by higher education institutions comprise a complex and critical set of differing standards and business procedures. These procedures allow the accurate identification of individuals associated with the institution and enable appropriate communication with these constituents. Collecting and sharing these personal identity records in a way that both protects privacy and remains flexible is key to ensuring a safe and equitable environment for everyone associated with the institution. Awareness is increasing that institutions need to be, and are becoming, more attentive to how we address students, faculty, staff, and other constituents and how we share their information. We are observing the making of a new norm. This evolution in the use of these data is a global concern, and, as is often the case, the higher education community is leading the way, though we expect to see a shift in the corporate world as well, when students transition from higher education into their careers. In May 2016, the Department of Education released a letter reminding institutions that Title IX protects all students from sex discrimination, which includes supporting a student’s preferred name, gender identity, and consistent pronouns. While some ERP systems partially support the use of preferred names, support for gender identity and pronouns remains relatively rare. As a result, many institutions have found it necessary to develop their own solutions as customizations or add-ons and have taken on both development and maintenance costs. To address this, EDUCAUSE brought together institutional and ERP vendor representatives with different perspectives from many sectors of higher education to build consensus on essential functionality to be provided by vendors of student records systems and collaboratively develop recommendations to fully support the collection, storage, and controlled display of gender identities, designated pronouns, and preferred names in ERP systems. The working group agreed that, because vendors of student systems will take different approaches to meet these recommendations, defining broad, functional requirements would be more useful than crafting detailed specifications. Further, if vendors of core administrative systems can
implement roughly equivalent changes, the likelihood increases that vendors of satellite systems (e.g., health services, student conduct, student housing) will follow suit.

This paper acknowledges that, although these recommendations are coming from a US-based perspective, institutions are working with students, employees, and alumni from a number of countries. The EU General Data Protection Regulation (GDPR)² might affect institutional business processes and technology needs, changing the expectations regarding the kind of data that are collected and how they will be used. Having the ability to configure name, gender, and pronouns such that they respect the usage by a global community is more important than ever. This has prompted the need for higher education institutions to revisit current policies and to ask their technology providers to enhance the methods for collecting, storing, and displaying these data.

The paper makes the assumption that these recommendations should be applied to all users: students, faculty, staff, alumni, temporary workers, and others. To address the full complement of persons, this paper uses the term “individual.” That said, higher education’s largest constituency is students. Students are also understood to be among the key drivers for change, and they vocally express their need for self-identity and modernization of our communications. They are online, social beings, with online profiles they curate, choosing what is displayed with some care. Our systems are changing, too, from an administrative focus to more of a social focus. This document posits a shift of control from what the institution wants to require of individuals to how individuals want to identify themselves.

**Recommendations**

We put forward these recommendations to start a conversation and begin to develop best practices for the higher education community for handling names, gender identities, pronouns, sexual orientation, and other data. This is of course the right thing to do to support an inclusive, supportive, and nondiscriminatory campus. These recommendations will certainly evolve, and individual institutions may adapt them to their own policies and culture. Developing these recommendations required and benefitted from the expertise of the entire group, including representatives from most of the common ERP systems and many sectors of higher education. This work is informed by other efforts, especially the 2016 *EDUCAUSE Review* article “Supporting Students’ Gender Identity: An IT Perspective” and the Higher Education Information Security Council (HEISC)
brief, *IT Considerations in Implementing Preferred Name Policies*. In addition, this paper was informed by the American Association of Collegiate Registrars and Admissions Officers (AACRAO) Student Identity Work Group effort, whose work complements this paper from a local campus perspective. Following are our recommendations for multiple name types, gender-related information, and permissions and access rights in campus information systems.

**Multiple Name Types**

Institutions typically use several different name types for each individual, and each of these can vary depending on cultural and geographical context. Name types are tied to the permissions layer (see Privacy Rights and Access Rights below). Some examples of name types include (but are not limited to):

- **Legal Name**: The name officially recognized by government entities and normally used in institutional reporting to those entities.
- **Campus Name**: The name an individual wishes to be known by while on campus.
- **Display Name**: The name shown within the institution’s information systems and other internal documents and databases.
- **Professional Name**: The name an individual (often a faculty member) is known by in a professional capacity.
- **Diploma Name**: The name as it should appear on the diploma.

**Recommendation**

Name types should support the following characteristics:

- The ability to support and/or require several parts, such as prefix, first name, middle name, last name, and suffix
- Effective-dated record of changes
- The ability to specify the name in an alternative language
- Pronunciation included as an audio file
- Phonetic representation
Gender-Related Information

There are multiple information attributes that relate to gender, including gender at birth, gender identity, legal sex/gender, sexual orientation, preferred salutation, and pronouns. Any information system that stores these attributes needs to be highly configurable, not only because definitions and terminology are in flux but also because institutions are likely to choose to handle this type of information very differently from one another.

Recommendation

To maximize configurability, gender-related attributes should support the following characteristics:

- The option to use or not use an attribute
- An editable list of fixed values for the attribute
- A configurable “other” option permitting the entry of freeform text
- Effective dating to track changes over time

Using Gender to Determine Housing

One key component of creating a gender-inclusive environment on campus is an institution’s ability to configure its ERP system to handle key data elements related to transgender students. In student housing, gender is an important part of determining room assignments. Can a student select a room based on gender identity, or will housing be assigned based on a student’s legal gender status or gender at birth? Some institutions will choose to implement gender-neutral housing processes. Institutions must work with their student populations to define their own policies, but it is important for software vendors to allow institutions to configure their housing processes according to their own policies. A flexible ERP system must be able to handle gender validation based on:

- Gender at birth
- Legal gender
- Student-identified gender

Privacy Rights

Privacy includes the rights of the individual, and access rights are related to what the institution can do with an individual’s information. These are complementary, and, as a general trend, individuals’ rights to their data are increasing.

Collecting and storing personal information in an information system implies that institutions must be responsible stewards of that information. Since personal information by definition belongs to an individual, careful thought must be given to the permissions afforded to individuals to see and update their own information. Further, the information system must provide secure, yet flexible, methods to control who at the institution has access to view and change personal information.
Gender Identity in Higher Education

Recommendations

Individuals should be able to:

- See their campus name and gender-related and other demographic information at any time.
- Request updates to their campus name and gender information at any time, preferably via self-service, with the option to have changes reviewed/approved by appropriate institutional staff.
- Be aware of how their campus name and gender-related information will be used by the institution (e.g., shared with committees, interest groups) and where it will be visible to others.
- Have the ability to determine which identification information will be displayed through institutional systems that have the option of multiple choices.

Institutions should:

- Define what specific identification information (name, gender, pronoun) to display, process, and report in a variety of contexts.
- Promote a clear understanding of controls and document appropriate uses of the data owned by the student.
- Create a standard coordinated procedure—one that does not require proof of medical designation or legal name change—for students, alumni, faculty, staff, and others who wish to change their gender identity and/or name.
- Decide on name types used in identity management systems.
- Incorporate updates for name and gender identity attributes into all institutional records and software, including:
  - ERP, LMS, and other third-party integrations.
  - Institutional identification, computer logins, and all public profiles.
  - Paper and online forms, including applications for employment, housing, admissions, etc.

Access Rights

An institution might decide to restrict internal access to name information to protect students undergoing gender transition who haven’t legally changed their name. This might result in a policy to treat student legal names as need-to-know information. This in turn might mean that payroll and financial aid would have access rights to the student’s legal name but that student life and dining services would not.

Access Rights

The ERP should provide the ability to configure what information is returned in a name search. Access rights essentially includes both access—the act of searching—and visibility, or who has permission to see the information (and where). Different access rights may be assigned to different areas of an application.
or roles within the institution. If your institution has a global search that exposes all of an individual’s information, you will need to revisit that for security, protection, and privacy concerns. Searches take three forms:

- Searches for an individual using personal information (e.g., by name) that only return simple lists of people. Search results may expose different elements about a person.
- Queries that may display information about multiple individuals. Search results may show more types of information.
- Reports, such as class rosters for faculty or for student use, internal and/or official transcripts.

Visibility and governance go hand in hand, and the system should be flexible enough to accommodate this. Every data element should have a default visibility as well as administrative override defined. For example, institutional research (IR) may need to know the gender identity of a student for reporting purposes; if institutional governance states that this field therefore must be visible to IR, then the individual’s choice to hide it should be overridden. Similarly, student life by default should be allowed to use personal pronouns (he/him/his; she/her/hers; they/them/their; ze/hir/hirs or ze/zir/zirs) in mail-merged communication to the students unless a student has chosen to disallow it, in which case a default behavior should kick in.

Below are examples of why access rights are needed:

- Only certain data elements will be under the direct control of an individual. For example, legal name may only be modified by the data steward (e.g., registrar, human resources, or alumni relations) with required proof. Other elements, such as gender identity or personal pronoun, may only be changed by the individual and no one else.

- Certain visibilities are set at an institutional level. For instance, class-list rules may govern what is shown by default—if the governance body decides that preferred name should be made visible in class rosters, then that becomes a default.

- The system of record should support flexibility in defining integrations. It should allow the institution to configure the name and gender-related information to include in a feed to other systems, such as a campus email system, LMS, or CRM.

**Recommendations**
In a self-service setting, if you have to make configuration choices for search capabilities, the default should be more restrictive than not to protect a person’s privacy. Some examples of searches that may return different information:

- Coaches may need to see an athlete’s legal name in order to book travel.
- Financial aid staff may need to see multiple name types to respectfully address the student and for aid processing and reporting.

A system should allow for flexible identity-display rules in which each data element is configurable by context and use, as in these situations:

- Which name types and name parts to use
- The order of name parts and any additional formatting needs, such as punctuation

**Conclusion**

This paper provides recommendations for modern identity specifications for campus information systems that would properly and respectfully handle the identity of students, faculty, and staff at our institutions.

Definitions have changed, but our systems have not kept up, so we propose a flexible and extensible method that will adapt as people’s thinking evolves. Rather than a one-time dialogue, it should be part of ongoing conversation among all stakeholders. By focusing on ERPs, the system of record for people, we can create standards that satellite systems will follow. Like universal design, these will benefit many, from those using a name different from their legal name to those expressing their identity.

Improvements in the design of ERP systems are necessary but not sufficient for creating a more inclusive campus environment. They cannot substitute for consideration and sensitivity on the part of every member of the community. Therefore, to be successful, raising awareness on campus must go hand-in-hand with the recommendations made in this paper.

In this way, IT departments can play a crucial role in breaking down silos and bringing the campus together to provide a more inclusive and welcoming community. We hope this conversation continues, particularly with vendor partners and other stakeholder organizations, such as AACRAO. Within EDUCAUSE, we encourage you to discuss and improve these ideas in our constituent groups, including the LGBTQIA, CIO, and Administrative Systems Management groups, among others.
Authors

Special thanks go to the following working group authors of this report:

Lawrence Borgione (Retired)
Product Manager, Campus Solutions
Product Strategy
Oracle Corporation

Jeff Elliott
Product Manager—Student
Jenzabar, Inc.

Steven Hahn
Vice Provost for Enrollment Management
University of Wisconsin–Madison

Michael Hart
Director of Security, Infrastructure, and Network Services
Metropolitan State University of Denver

Ellen Jetto
Formerly: Product Owner/Business Analyst
Ellucian

Barron Koralesky
Chief Information Officer
Williams College

Criss Laidlaw
Director of Administrative Information Systems
Williams College

Sandy Pearson
Product Management Manager
Oracle Corporation

Ravi Ravishanker
Chief Information Officer and Associate Dean of WellesleyX
Wellesley College

Richard Skeel
Director, Product Management
Ellucian

Eunice Wells
Product Manager, Workday Student
Notes

1. The letter was blocked by a lawsuit in the Texas Supreme Court and has been rescinded. Nonetheless, the letter brought this issue to the national forefront and became a motivating factor.

2. For more on this regulation, visit the EDUCAUSE Library page on EU General Data Protection Regulation (GDPR).

3. See Student Identity Work Group for more information on this group. Its work is not yet complete; a February 2018 update describes its focus as “best practices in name and gender marker changes, developing and implementing a preferred name policy, developing a designated pronoun strategy for your campus, and the use of gender and birth sex in reporting, admissions, scholarships, and other campus opportunities.”

4. A glossary produced by AACRAO defines gender identity as “a person’s innermost concept of self as man, woman, a blend of both, or neither—how individuals perceive themselves and what they call themselves. Gender identity can be the same or different from one’s sex assigned at birth.” Examples include man, woman, trans-man, and trans-woman.

5. Legal sex/gender is included here because it is sometimes required for state reporting (currently this is true for Oregon only but might expand to other states in the future). It is distinct from birth sex, and the laws are in flux. Some states are passing laws that enable legal recognition of gender; for more information, see Legal recognition of non-binary gender.

About EDUCAUSE

EDUCAUSE is a higher education technology association and the largest community of IT leaders and professionals committed to advancing higher education. Technology, IT roles and responsibilities, and higher education are dynamically changing. Formed in 1998, EDUCAUSE supports those who lead, manage, and use information technology to anticipate and adapt to these changes, advancing strategic IT decision making at every level within higher education. EDUCAUSE is a global nonprofit organization whose members include U.S. and international higher education institutions, corporations, not-for-profit organizations, and K–12 institutions. With a community of more than 99,000 individuals at member organizations located around the world, EDUCAUSE encourages diversity in perspective, opinion, and representation. For more information please visit educause.edu.

Citation for This Work


© 2018 EDUCAUSE. This work is licensed under a Creative Commons BY-NC-ND 4.0 International License.