IT Considerations in Implementing Preferred Name Policies

A HEISC Resource

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Introduction

In May 2016, the Department of Education issued a “Dear Colleague” letter regarding transgender and gender-nonconforming students.¹ In its letter, the department reminded institutions that Title IX protects all students from sex discrimination. Once a student notifies the institution that the student will begin asserting a gender identity that differs from previous representations or records, the institution must begin treating that student consistent with the student’s asserted gender identity.

This document lists some IT and policy questions that must be considered in implementing processes within IT systems to support a student’s gender identity, such as preferred name, preferred gender specification, and preferred pronoun (collectively referred to as “preferred name” in this resource).²

Technical Implementation Questions

As institutions implement preferred name policies, the following IT questions should be considered:

• Does the institution have an IT system that is the authoritative source for student identification information on campus, such as a preferred name, specified gender, or preferred pronouns? If not, which IT system should be the authoritative location of record?

• Which IT systems should display a person’s preferred name?
  ▪ It seems appropriate to put what is here termed preferred name into the DisplayName attribute in LDAP directories including Active Directory.

• What systems (if any) need to track the history of preferred name changes for a person or match a preferred name with a legal name (to know that records with different preferred names and/or legal names are in fact records about the same person)?

• How will usernames or NetIDs be handled?
  ▪ Most institutions create usernames or NetIDs based on a person’s name. Should institutionally assigned usernames be changed automatically, on request, or not changed when a person specifies a preferred name?
  ▪ What do you do if you have automatic auxiliary e-mail alias creation?

• Are there any IT system character limits or script restrictions for system credentials or usernames that may affect implementation? What other IT system nuances must be addressed?
  ▪ For example, some authoritative source IT systems only allow for 20 characters. How will names longer than that length, or hyphenated names, be handled?
  ▪ For example, should the institution also review whether to accommodate those with names written with diacritics or in other scripts? Does a recommendation to implement Unicode in UTF8 encoding cover this concern?
  ▪ If some systems use a middle name, does that present an opportunity for a preferred name input?

² Note that implementing such processes may be of benefit to a number of community members including faculty, staff, and other student groups. For instance, international students who wish to adopt a chosen name that is different from their legal name may also take advantage of an institutional preferred name process.
• How do we work with vendors and how do we bring these issues to the conversation?
  ▪ Do third-party products have the flexibility required to fully support students?

**Policy/Process Implementation Questions**

As institutions implement preferred name policies, the following policy and process questions should be considered:

• Has your institution implemented a policy/process for accommodating preferred name, gender specification, and preferred pronoun requests?
  ▪ Is the policy/process documented?
  ▪ Is the policy/process easily available to the institutional community?

• If your institution has not implemented a policy/process for accommodating preferred name, gender specification, and preferred pronoun requests:
  ▪ Review how other institutions have handled this process. The Campus Pride website contains a roster of colleges and universities that allow students to change the name and gender on their campus records. The roster is divided into institutions that (1) enable students to use a preferred first name instead of their legal name on campus records, (2) enable students to change their gender on campus records without proof of medical intervention, and (3) enable students to indicate their preferred pronoun.
  ▪ Who should be included in the policy-making process? There are a number of different areas that may have critical expertise during the policy making process. Some units/stakeholders include:
    ▶ Faculty and staff representatives
    ▶ Financial aid
    ▶ Identity/gender/sexuality centers
    ▶ International programs
    ▶ IT representatives (especially personnel in identity management units and those who understand IT system data flows)
    ▶ Legal counsel
    ▶ Registrar
    ▶ Student affairs
    ▶ Student council reps
  ▪ What event properly triggers a preferred name, gender identity, or pronoun preference change at the institution? Is any evidence required to document such a change?
  ▪ What kinds of guidelines must be in place for selecting a preferred name? Are preferred names vetted and sometimes disallowed? When does this vetting take place (e.g., preapproval process, review after the fact for violation of guidelines, review triggered by complaints, or no oversight)?
  ▪ Should institutions restrict the frequency or total number of preferred name changes for an individual?
- Does the institution define legal name, preferred name, and alias in its policy?
  - **Legal name:** A legal name is the name that identifies a person for legal purposes; it is typically the name that a person was given at birth and which then appears on a birth certificate to record that person’s birth. A legal name may be changed in response to certain events as specified by state law.
  - **Preferred name:** A preferred name is a name other than an individual’s legal name that the individual uses for identification.
  - **Alias:** Most often used in conjunction with an e-mail address, an alias is a user-specified alternate name that is delivered to an institutionally provisioned e-mail account.

- Where must a legal name be used in place of a preferred name? (How does information flow within your IT systems, and where must those flows be validated and resolved with respect to preferred name and legal name?)
  - **Legal name:** Used for Social Security reporting, tax reporting, and financial aid (essentially anything dealing with federal or state authorities)
  - **Preferred name:** Used for class lists, the LMS, CRM, and alumni relations

- When should a preferred name, gender specification, and preferred pronoun request be implemented?
  - For a new process, when in the semester/semester break should you begin making the facility available?
  - How is communication of a change communicated to individuals with a need to know (e.g., faculty, advisers, business departments, etc.)? How is this done sensitively and appropriately?
  - Who implements preferred name, gender specification, and preferred pronoun feeds?

### Recommendations
- Strong campus identity and access management practices can help manage name changes from the IT system perspective. An identity and access management system provides a framework for managing identities in IT systems. A single authoritative campus identity management system makes managing preferred name activities easier.
- Institutions should adopt a policy for preferred name changes and procedures to support that policy. This may be a difficult area for students to navigate; having policies and procedures formalized will make the process more easily navigable. Institutions should understand that policies and practices will need to evolve as expectations and norms evolve, so careful and respectful communication about policies is needed.

### Additional Resources
- U.S. Department of Education, [Resources for Transgender and Gender-Nonconforming Students](#)
- Campus Pride—the primary resource listing how institutions have addressed preferred name issues for students
- Gender-Neutral and Non-Binary Preferred Gender Pronouns 101
• Carleton College: Transitioning at Carleton
• Carleton College Enterprise Systems Advisory Group—Report from the Task Force on Recording Gender and Sex
• McGill University Preferred First Name FAQ
• Pennsylvania State University Preferred Name Policy
• University of Alaska Use of Preferred Names
• University of North Carolina at Charlotte Preferred Name Policy
• University of Vermont Preferred Name and Pronoun Use

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