

PROPOSAL TO COLLECT SEXUAL ORIENTATION AND GENDER IDENTITY INFORMATION IN CTCLINK

Background

Recognition and affirmation of student identity is vital to the success, well-being, and sense of belonging students experience at their college or university. For many students, recognition and affirmation includes sexual orientation and gender identity. While Washington state provides expanded protections for the LGBTQIA+ community, many within the community continue to experience harassment, discrimination, and other forms of oppression. To provide for a welcoming learning environment, collecting this data is one way for the community and technical college system to support this population.

The community and technical college system's Data Governance Committee (DGC) was asked to implement collection of Sexual Orientation and Gender Identity (SOGI) data in the ctcLink system for students and employees. This proposal details this request from the perspective of implementing in the ctcLink Campus Solutions and Human Capital Management (HCM) pillars.

No data collection mechanisms for gender identity or sexual orientation have been implemented to date in ctcLink. The Campus Solutions 9.2 upgrade (completed in October 2019) included functionality for SOGI data collection eliminating the need for a customized solution. The functionality includes a page in Student Self-Service as well as a new database table to store the data. This functionality is not available in the Human Capital Management pillar and will require a customized solution.¹

Why Should Colleges Collect this Information?

The primary purpose for collecting sexual orientation and gender identity information is to ensure inclusivity and success for all students in our system. It is imperative, and a system goal, to provide safe places for all students to be affirmed in their identity and learn in an environment free from harassment and discrimination. In addition, this data will assist local colleges in providing services and creating programs and curriculum designed to support student success within the LGBTQIA+ community.

The primary driver for collecting this information in the Human Capital Management (HCM) pillar of ctcLink is the new optional data collection of gender identity to the Office of Financial Management and the Health Care Authority. This data collection also allows the colleges to include gender identity in the reporting at the aggregate level of the bio demographic composition of the college's faculty and staff.

¹ Community and technical college students in 2011 originally requested SOGI, formerly known as LGBTQ, data collection. It was implemented in the legacy system in February 2013 and still exists.

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Who Developed this Proposal?

The Data Governance Committee formed the SOGI subcommittee tasking it to develop a proposal to collect sexual orientation and gender identity in ctcLink. The subcommittee was asked to consider the implementation in Campus Solutions and Human Capital Management due to the close integration between these two pillars.

The subcommittee includes representatives from the following councils and commissions:

- Admission and Registration Council (ARC)
- Human Resources Management Commission (HRMC)
- Information Technology Commission (ITC)
- Multicultural Student Services Directors Council (MSSDC)
- Public Information Commission (PIC)
- Research and Planning Commission (RPC)
- State Board for Community and Technical Colleges (SBCTC)
- Student Services Commission (WSSSC)

A complete list of members is included in [Appendix A](#).

The SOGI subcommittee first met on Oct. 18, 2019 via WebEx.

What Data Points are Being Considered in this Proposal?

The SOGI subcommittee was asked to analyze gender identity data collection mechanisms in ctcLink. This includes not only the sexual orientation and gender identity data elements, but also gender (sex), name prefix, and ethnicity.

A ctcLink Global Design Review recommendation to add gender neutral name prefixes and ethnicities was included in this proposal to insure a holistic approach for collection of student identity related data in the ctcLink system.

As the subcommittee began conversations, it became apparent that to be truly holistic, the subcommittee should also consider collection of student and staff names (e.g., legal, preferred/primary) and pronouns.

To move work forward as quickly as possible, the subcommittee decided to break these data points into two phases. Phase I focused on sexual orientation, gender identity, gender (sex), gender neutral name prefixes and gender neutral ethnicities. Phase II will include analysis and a possible proposal concerning the business processes related to collecting student and staff names and pronouns.

What is the Specific Proposal?

For Campus Solutions

- Sexual orientation and gender identity:
 - Configure the availability of the Biological Details page in Student Self-Service for gender identity using the Campus Solutions 9.2 delivered functionality. See [Appendix E](#) and [Appendix F](#) for examples.

- Include a message to the student on the Biological Details page that explains the purpose and use of collecting this data.
- Configure the list of sexual orientation and gender identity codes and descriptions found in Appendices B and C.
 - Note that delivered functionality displays the listing of values to the user in alphabetical order. This is the subcommittee's desired approach.
 - Also note that the proposed codes are generic in nature and do not include reference to the description of the code to provide an additional level of data security.
- Out of concern for student safety, define both sexual orientation and gender identity data elements as highly sensitive data needing special handling (Appendix D – OCIO Data Classification Policy), the most restrictive level of data security.
- Create new page level and query level user security roles to restrict access to these data elements. Access to view this data on a page or in a query should be restricted only to users who have been explicitly approved by each college to view the data.
- Only collect this information from within Student Self-Service. This information should not be collected at the time of admission to the college. This proposal does not request the modification of the Online Admissions Application (OAA) to collect this information.
- Allow to student to add or change their responses on demand in Student Self-Service.
- Existing data element Sex:
 - Modify the label on all pages where this data element is displayed or collected from “Gender” to “Sex”. This is to clarify the difference between the data points Sex and Gender Identity. Pages impacted include those in Student Self-Service, Online Admissions Application (OAA) and Add/Edit a Person in addition to any other page where this data element is displayed or collected.
 - Modify the description of the existing value of ‘X’ from “Indeterminate/Intersex/Unspec” to “Not Exclusively Male or Female” to align with the definition of sex per [WAC 308-104-0150\(2\)](#).
 - Include a page header (or tool tip in OAA) on the data collection pages for Sex to include the official Washington state definition of sex noted in the above bullet.
 - Note that Sex is only collected from the student at the time of admissions. Each college has a business process in place if the student requests a change and the change is performed by college staff.
 - Sex should continue to be considered highly sensitive OCIO Category 3 data. This categorization does not require a security role assignment change. All other biographical demographic data elements including race and ethnicity are also considered Category 3 data. Category 3 data should only be used for official educational purposes and not shared with external parties unless under a data sharing agreement.
- Name Prefix:
 - The gender neutral value of “Mx.” has already been configured in the ctcLink system. This data element and its associated values were reviewed by the subcommittee for its alignment with other

gender neutral bio-demographic data collection mechanisms. No change is requested.

- Ethnicity:
 - Modify the label associated to the five gender specific ethnicity listed below to include a gender neutral option.

Code	Description
CHICAN	Chicana/Chicano/Chicanx
LATINO	Latina/Latino/Latinx
SUDAMER	Sudamericana/Sudamericano/Sudamericanx
GUAJIR	Guajira/Guajiro/Guajirx
MESITIZ	Mestiza/Mestizo/Mestizx

For Human Capital Management

- Sexual orientation and gender identity:
 - Create a data collection page in Employee Self-Service to collect both sexual orientation and gender identity.
 - Include a message to the staff on this new page that explains the purpose and use of collecting this data.
 - Create a custom record (table) to store the sexual orientation and gender identity values by EMPLID. To assist with the application of query security, these data elements should be stored in their own record, not added to an existing record.
 - Configure the list of sexual orientation and gender identity codes and descriptions found in [Appendix B](#) and [Appendix C](#).
 - Note that the listing should be shown in alphabetical order based on the description of the code.
 - Also note that the proposed codes are generic in nature and do not include reference to the description of the code to provide an additional level of data security.
 - Define both sexual orientation and gender identity data elements as highly sensitive data needing special handling under OCIO Category 4 (Appendix D – OCIO Data Classification Policy), the most restrictive level of data security.
 - Create new page level and query level user security roles to restrict access to these data elements. Access to view this data on a page or in a query should be restricted to only users that have been explicitly approved by the college to view the data.
 - Allow the employee to add or change their responses on demand in Employee Self-Service.
- Existing data element Sex:
 - Modify the label on all pages where this data element is displayed or collected from “Gender” to “Sex”. This is to clarify the difference between the data points Sex and Gender Identity. Pages include Employee Self-Service and Add/Edit a Person in addition to any other page where this data element is displayed or collected.

- Modify the description of the existing value of ‘X’ from “Indeterminate/Intersex/Unspec” to “Not Exclusively Male or Female” to align with the definition of sex per [WAC 308-104-0150\(2\)](#).
- The self-service pages where an employee’s sex is displayed should be read only. Each college has a business process in place if the employee requests a change and the change is performed by college staff not the employee themselves.
- Sex should continue to be considered highly sensitive OCIO Category 3 data and does not require a security role assignment change. All other biographical demographic data elements including race and ethnicity are also considered Category 3 data. Category 3 data should only be used for official educational purposes and not shared with external parties unless under a data sharing agreement.
- Name Prefix:
 - The gender neutral value of “Mx.” has already been configured in the ctcLink system. This data element and its associated values were reviewed by the subcommittee for its alignment with other gender neutral bio demographic data collection mechanisms. No change is requested.
- Ethnicity:
 - Modify the label associated to the five gender specific ethnicity listed below to include a gender neutral option.

Code	Description
CHICAN	Chicana/Chicano/Chicanx
LATINO	Latina/Latino/Latinx
SUDAMER	Sudamericana/Sudamericano/Sudamericanx
GUAJIR	Guajira/Guajiro/Guajirx
MESITIZ	Mestiza/Mestizo/Mestizx

How will we protect this data from inappropriate access and use?

The SOGI subcommittee discussed in detail the level of security that should be applied in the handling of sex, sexual orientation and gender identity and proposes the following data classifications:

- Sex – Category 3
- Gender Identity – Category 4
- Sexual Orientation – Category 4
- Ethnicity – Category 3
- Name Prefix – Category 2

See Appendix D for the full text of the OCIO data classification policy.

The above data classifications will drive the need for an additional set of page and query roles to restrict access to the data to anyone who has not been approved to view the data.

The subcommittee also proposed that a document be developed and distributed to all system employees describing the proper handling and usage of student and staff sex, sexual orientation and gender identity data.

Did the SOGI subcommittee solicit feedback or refer to national best practices in the development of this proposal?

The SOGI subcommittee gathered feedback from students and staff regarding what categories of sexual orientation and gender identity should be collected. This process also included feedback on the example Campus Solutions Biographic Details page configuration as shown in [Appendix E](#) and [Appendix F](#) as well as the proposed gender neutral ethnicity changes.

The committee regularly referenced the American Association of Collegiate Registrars and Admissions Officers' (AACRAO) [Sexual Identity](#) publication for recommendations and guidance on best practices.

What about the Legacy System?

The legacy system has collected sexual orientation and gender identity from students since 2013. No changes or additions to this data collection is being requested by the subcommittee at this time. This proposal only relates to ctcLink.

What are the Next Steps?

The Data Governance Committee will submit a ctcLink enhancement request to the ctcLink governance Working Group Committee. If approved, implementation deadlines will be determined. Impacts to the ctcLink project schedule must be considered.

The SOGI subcommittee also proposes the creation of a Data Governance Bio-Demographic standing subcommittee charged with governing the collection of bio-demographic data in ctcLink. This new subcommittee would also be charged with an annual review of the collection of sexual orientation and gender identity information.

Appendix A – Sub-Committee Members

Name	College	Representing
Ruby Hayden (co-chair)	Lake Washington	WSSSC/DGC
Carmen McKenzie (co-chair)	SBCTC	SBCTC/DGC
Joyce Allen	Seattle Colleges	ARC
Karl Smith	Everett	ARC
Chantel Black	Spokane	ARC
Michael Singletary + team	Whatcom	ARC
Veronica Corral	Whatcom	ARC
Janice Hill	Olympic	ARC
Rachel Rodriguez	Whatcom	ARC
Carolyn Tucker	Skagit	HRMC
Tim Rager	Everett	ITC
Jamie Ardeña	Shoreline	MSSDC
Tawny Dotson	Clover Park	PIC
Stephanie Dykes	North Seattle	RPC
Victoria Ichungwa	Tacoma	RPC
Christopher Soran	Tacoma	RPC
Cath Busha	Clark	WSSC
Dani Trimble	Lower Columbia	WSSSC

Appendix B – Gender Identity Codes and Descriptions

Code	Description	Definition
XA	A Gender Identity not listed here	A gender identity not listed here.
XB	Female (Cisgender)	Someone who identifies as female.
XC	Gender Fluid	Denoting or relating to a person who does not identify themselves as having a fixed gender. Gender fluid refers to someone whose gender is fluid and fluctuates between two or more genders.
XD	Gender Non-conforming	Gender expression that does not conform to societal norms.
XE	Intersex	A person whose internal or external sexual organs, chromosomes, or other biological features are neither exclusively male or female at birth
XF	Male (Cisgender)	Someone who identifies as male.
XG	More than one gender identity	More than one gender identity.
XH	Non-binary	A person who does not identify as either male or female. Gender identity is not seen as a binary.
XJ	Prefer not to answer	Prefer not to answer
XK	Questioning	The questioning of one's gender, sexual identity, sexual orientation, or all three is a process of exploration by people who may be unsure, still exploring, and concerned about applying a social label to themselves for various reasons.
XL	Transgender Female	A transgender female is someone who was assigned male at the time of birth, but later identifies as female.
XM	Transgender Male	A transgender male is someone who was assigned female at the time of birth, but later identifies as male.
XN	Two-Spirit	Two-Spirit is a term used by some indigenous North Americans to describe gender-variant individuals in their communities, specifically people within indigenous communities who are seen as having both male and female spirits within them. It is also frequently used to describe individuals who do not identify as heterosexual or straight.

Appendix C – Sexual Orientation Codes and Descriptions

Code	Label	Description
ZA	Asexual	Asexuality (or no sexuality) is the lack of sexual attraction to anyone, or low or absent interest in sexual activity. It may be considered the lack of a sexual orientation, or one of the variations thereof, alongside heterosexuality, homosexuality, and bisexuality.
ZB	Bisexual	Bisexuality is romantic attraction, sexual attraction or sexual behavior toward both males and females, or romantic or sexual attraction to people of any sex or gender identity; this latter aspect is sometimes termed pansexuality.
ZC	Gay	Gay is a term that primarily refers to a homosexual person or the trait of being homosexual. Gay is often used to describe homosexual males but lesbians may also be referred to as gay.
ZD	Lesbian	A lesbian is a female homosexual; a female who experiences romantic love or sexual attraction to other females.
ZE	Pansexual	Pansexuality, or omnisexuality, is sexual attraction, romantic love, or emotional attraction toward people of any sex or gender identity.
ZF	Queer	Queer is an umbrella term for sexual and gender minorities that are not heterosexual or cisgender. Queer was originally used pejoratively against those with same-sex desires but, beginning in the late-1980s, queer scholars and activists began to reclaim the word.
ZG	Questioning	The questioning of one's gender, sexual identity, sexual orientation, or all three is a process of exploration by people who may be unsure, still exploring, and concerned about applying a social label to themselves for various reasons.
ZH	Two-Spirit	Two-Spirit is a term used by some indigenous North Americans to describe gender-variant individuals in their communities, specifically people within indigenous communities who are seen as having both male and female spirits within them. It is also frequently used to describe individuals who do not identify as heterosexual or straight.
ZJ	Heterosexual/Straight	People who are attracted to a different gender, for example, women who are attracted to men or men who are attracted to women.
ZK	A Sexual Orientation not listed here	A Sexual Orientation not listed here
ZL	Prefer not to answer	Prefer not to answer

Appendix D – OCIO Data Classification Policy

4.1 Data Classification

Agencies must classify data into categories based on the sensitivity of the data. Agency data classification must translate to or include the following classification categories:

1. Category 1 – Public Information
2. Public information is information that can be or currently is released to the public. It does not need protection from unauthorized disclosure, but does need integrity and availability protection controls.
3. Category 2 – Sensitive Information
4. Sensitive information may not be specifically protected from disclosure by law and is for official use only. Sensitive information is generally not released to the public unless specifically requested.
5. Category 3 – Confidential Information
6. Confidential information is information that is specifically protected from disclosure by law. It may include but is not limited to:
 - a. Personal information about individuals, regardless of how that information is obtained.
 - b. Information concerning employee personnel records.
 - c. Information regarding IT infrastructure and security of computer and telecommunications systems.
7. Category 4—Confidential Information Requiring Special Handling
Confidential information requiring special handling is information that is specifically protected from disclosure by law and for which:
 - a. Especially strict handling requirements are dictated, such as by statutes, regulations, or agreements.
 - b. Serious consequences could arise from unauthorized disclosure, such as threats to health and safety, or legal sanctions.



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Except where otherwise noted

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Appendix E – Biographic Details Page Mockup for Gender Identity

ctcLink Student Homepage Profile

ID

Personal Details	Personal	Biographic						
<ul style="list-style-type: none">Contact DetailsAddressesEmergency ContactsEthnicityPrivacy Restrictions	<h3>Biographic Details</h3> <p>▼ Gender Expression</p> <table border="1"><thead><tr><th>Field</th><th>Value</th></tr></thead><tbody><tr><td>Gender Identity</td><td></td></tr><tr><td>Sexual Orientation</td><td></td></tr></tbody></table>	Field	Value	Gender Identity		Sexual Orientation		
Field	Value							
Gender Identity								
Sexual Orientation								

Cancel **Edit Details** Save

*Gender Identity

Male ▼

Female

Gender identity not listed

Gender non-conforming

Intersex

Male

Multiple gender identities

Non-binary

Prefer not to answer

Questioning

Transgender

Appendix F — Biographic Details Page Mockup for Sexual Orientation

< ctcLink Student Homepage Profile

ID

Personal Details Personal Biographic

Contact Details

Addresses

Emergency Contacts

Ethnicity

Privacy Restrictions

Biographic Details

Gender Expression

Field	Value
Gender Identity	
Sexual Orientation	

Cancel **Edit Details** Save

*Sexual Orientation

- Asexual
- Bisexual
- Gay
- Heterosexual/straight
- Lesbian
- Pansexual
- Prefer not to answer
- Queer
- Questioning
- Sexual orientation not listed
- Two-Spirit