

POLICY NAME: Name, Gender, Sexual Identity and Pronoun Data Policy

POLICY NUMBER: *Unique identifier assigned by OARC (XX-00-00)*

Authority Title and Review Information	Name and Date
Approval Authority:	<i>Senior administrator or governing body whose approval is required to adopt or revise a university policy</i>
Responsible Executive:	Vice President and Chief Diversity Officer
Responsible Office:	Office for Institutional Diversity and Inclusion
Responsible Officer:	Director of Equity and Compliance
Policy Category	Compliance
Effective Date:	<i>Date the policy was approved and posted on the MSU Policy Library.</i>
Last Review Date:	<i>Date of the last policy review.</i>
Next Review Date:	<i>Date of next scheduled review, 3 years but not to exceed 5 years from last review date.</i>

I. POLICY STATEMENT

MSU is committed to increasing diversity, ensuring equity, and promoting inclusion. We want to provide data for our campus community that is both accurate and inclusive. Language is shifting and changing all of the time, as is our understanding of sexuality and gender. We are committed to collecting data that supports inclusion and success of all campus community members while maintaining privacy. Data is one way to shift culture to promote and practice inclusion. Each of us must invest in our campus and community in a way which promotes the health, dignity, and respect of each other, the ability to pursue rigorous study, and to fulfill the mission of the land grant institution.

II. SCOPE

This policy applies to all campus data systems that identify individuals (name, pronoun, honorific, etc.) or collect demographic data (gender, sexual identity).

III. DEFINITIONS

For purposes of this policy:

Auxiliary System: Pulls data directly from core systems but does not directly collect or manage changes to the data.

Core System: Directly collects, manages changes, and stores demographic personally identifiable (PII) data. It is commonly referred to as “the system of record” for the data types.

Gender: A person’s deep-seated, internal sense of who they are as a gendered being, specifically, the gender which they identify themselves.

Legal Name: The name that appears on an individual’s legal documents (i.e., passport, driver’s license, Social Security card).

Legal Sex: This is the gender marker on a person’s government issued ID (i.e., driver’s license or passport).

Name: The name used by an individual for daily self-identification and should be used at all times to refer to that individual unless legality requires otherwise.

Personally Identifiable Information (PII): The term “PII,” as defined in OMB Memorandum M-07-1616 refers to information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. In performing this assessment, it is important for an agency to recognize that non-PII can become PII whenever additional information is made publicly available - in any medium and from any source - that, when combined with other available information, could be used to identify an individual.

Prefix: a title used before a person's name (i.e., Mr., Ms., Mx., Dr.).

Priority System: A system that collects, manages, and/or impacts the most users and/or facilitates interaction with campus stakeholders (i.e., students, employees, alumni, donors, etc.) that should be included in a first phase update cycle.

Pronouns: Linguistic tools we use to refer to ourselves or others.

Sexual Identity: Identities related to a person's feelings of attraction towards other people.

IV. POLICY

It is the policy of Michigan State University for all MSU and vendor systems that identify individuals or collect demographic data to have database labels that support and align with gender, legal name, legal sex, name, prefix, pronouns, and sexual identity.

All data created by this policy (gender, legal name, legal sex, name, prefix, pronouns, and sexual identity) are classified as Personally Identifiable Information (PII) and will be

protected as such per University policies and practices.

The fields of “Gender”, “Sexual Identity”, and “Pronouns” must allow multiple responses.

To maintain privacy:

- Include a disclaimer on any data collection forms as to how the information will be used.
- Where possible, a University unit or member who is collecting information about University members’ legal sexes, sexes assigned at birth, and/or genders should explain at the time of collection the reason for collecting the information and how the information will be used. University members do not have to respond to requests to disclose their legal sex, sex assigned at birth, or gender identity, except when legally required or when there is a legitimate University-related reason for the request.
- Units must take reasonable steps to maintain the privacy of the names, pronouns, genders, and legal sexes of University members that are maintained in University records. Only school officials with a legitimate educational interest in knowing the name, pronouns, gender and legal sex of a student maintained in University records should access, or be provided access to this information. Only individuals whose work assignments reasonably require access to the name, pronouns, gender and legal sex of any other University member maintained in University records should access or be provided access to, this information.

V. POLICY PROCEDURES

Names: Two Options Required

1. **Legal Name:** The name that appears on an individual’s legal documents (i.e., passport, driver’s license, Social Security card). The LEGAL NAME field should only be used when required by local, state, federal law or University policy.
2. **Name:** to refer to the name that is used by the individual for self-identification. This field should be used for all regular communications with the individual (unless LEGAL NAME is required by law).
 - An individual's NAME field should be used when the university sends general communications to that person. If no NAME exists for an individual, the LEGAL NAME may be used.
 - In current external data collection/display forms and internal databases, the “PREFERRED NAME” data label (if used) should be replaced with “NAME.”
 - The NAME field should be populated based on the individual’s directive and can be changed without documentation.
 - If a database label change is not possible, at a minimum any public facing data entry form or public display (i.e., directory or bio update form) must adopt these changes.
 - Where possible, pronunciation aids should be incorporated (such as ability to record how one pronounces their own name).

Gender: Two Options Required

1. **Legal Sex:** This is distinct from birth-assigned sex. This is the gender marker on a person’s government issued ID. This value should only be used when required

by local, state, federal law or University policy. In all other cases, GENDER should be collected and used.

- Data Values: Male, Female, X
2. **Gender***: This field is to be made available to be leveraged by the individual but must not be information that they are required to provide.
- Data Values (multiple responses allowed): Woman, Man, Cisgender, Transgender, Non-binary, Genderqueer, Gender non-conforming, Agender, Two-spirit, Prefer not to specify, Enter your own: (open text field)

**The GENDER field should only be populated if the information is obtained directly from the Individual - it should never be assumed.*

Additional Data Fields:

3. **Sexual Identity**: This field is to be made available to be leveraged by the individual but must not be information that they are required to provide.
- Data Values (multiple responses allowed): Asexual, Bisexual, Demisexual, Gay, Lesbian, Pansexual, Queer, Questioning or unsure, Same-gender Loving, Straight, Prefer not to specify, Enter your own: (open text field)
4. **Pronouns**:
- Data Values (multiple responses allowed): She/her/hers, He/him/his, They/them/theirs, No pronouns, just use my name, Enter your own: (open text field)
5. **Honorifics/Prefixes***:
- Data Values (minimum required values): Mr. Ms. Mx. Miss, Mrs., Dr., Enter your own: (open text field), None

**The HONORIFICS/PREFIXES field should only be populated if the information is obtained directly from the individual - it should never be assumed.*

VI. VIOLATIONS

Employees or students who violate this policy may be subject to discipline. *[Additionally, consider specific language as it relates to reporting a possible violation as well as the range of potential discipline, sanction, or corrective action.]*

VII. RELATED INFORMATION AND ATTACHMENTS

[MSU Institutional Data Policy](#)

[Acceptable Use Policy for MSU Information Technology Resources](#)

[Family Educational Rights and Privacy Act \(FERPA\)](#)

[Anti-discrimination Policy](#)

[Short-Term Work Group on Names and Pronouns](#)

MSU RO: Academic Programs – General Procedures and Regulations Student Name

MSU Diversity, Equity and Inclusion Plan

MSU 2030 Strategic Plan

VIII. HISTORY

[Document the history of issuance, approvals, and revisions of the policy in the table. For new revisions and where possible for historical revisions, note the part of the policy that was revised and reason for the revision.]

Action
Issued:

Description

Include date the action occurred and executive position title with name or committee name. For revisions, also include the changes that were made to the policy.