I. POLICY STATEMENT
This policy outlines the College's governance and procedures with respect to the gathering and reporting of institutional data and statistics.

II. ENTITIES COVERED BY THIS POLICY
- All units of the College

III. CONTACTS
Direct any questions about this policy to your department’s supervisor. Questions about specific issues may be addressed to:

<table>
<thead>
<tr>
<th>Contact</th>
<th>Telephone¹</th>
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<tbody>
<tr>
<td>Office of the Vice President for Academic Affairs</td>
<td>x18117</td>
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¹ Numbers refer to on-campus extensions. When calling from an off-campus line, please dial (909) 62+extension for numbers beginning with a “1” and please dial (909) 60+ extension for numbers beginning with a “7.”
IV. DISCUSSION

Departmental Expectations and Responsibilities (to be implemented and effective no later than July 1, 2013):

- Each organizational department within the College (e.g., Admission, Financial Aid, Academic Affairs, Human Resources, Student Affairs, Development, Athletics, Treasurer, etc.), has the primary responsibility and accountability for insuring the accuracy and integrity of any institutional data or statistics that are generated or reported from their department.

- As part of this responsibility, each Department is required to develop and maintain an up-to-date and comprehensive list of all external surveys and other data reported to parties outside the College. A copy of this listing shall be retained by both the relevant Vice President overseeing the Department and the Office of Institutional Research (“OIR”).

- As a further part of this responsibility, each Department is required to develop and maintain annotated notes / instructions for all external survey reports that detail the methodology and data construction rules that were followed in responding to the survey. Copies of these survey response instructions shall be retained by both the relevant Vice President overseeing the Department and the OIR.

- As a further part of this responsibility, each Department is required to develop and document written internal procedures with respect to the gathering and reporting of institutional data and statistics. At a minimum, these procedures need to incorporate the following concepts:
  - A separation of duties as to the data collection and response process so that a single individual does not control the data collection and reporting process. If there are circumstances in which a Department believes this is not feasible or practical given staff resources, these circumstances and the Department’s proposed alternative procedure should be reviewed by the Enterprise Risk Management Committee (“ERMC”).
  - A reasonable independent review. Depending on the circumstances, the independent review can be performed by other individuals within the Department, or it may be performed by another office, such as the OIR.
  - Once these steps have been completed, a “sign-off” by the relevant operational Vice President that is documented and retained as part of the survey response record.

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2 The Enterprise Risk Management Committee is comprised of the Vice President for Academic Affairs and the Dean of the Faculty; Vice President for Business and Administration and Treasurer; Vice President for Administration and Planning, General Counsel, and Secretary of the College; Vice President for Student Affairs, Admission and Financial Aid; Assistant Vice President for Finance and Assistant Treasurer.
The ability to keep an auditable record of the survey response (including the annotated survey instructions and copies of the underlying data and working papers used to respond to the survey) so that the survey response may be audited at a later date.

Copies of these internal procedures shall be retained by both the relevant Vice President overseeing the Department and the OIR.

- Each Department is expected to list the Office of Institutional Research as a primary or secondary contact on each survey.
  - If a survey only allows for a single contact, the question of which office or department should serve as the point of contact should be reviewed by the Institutional Research Committee (“IRC”).

- Prior to submitting a survey, any Department that retains responsibility for submitting a survey is expected to submit a copy of the proposed survey response to the OIR at least 2 weeks prior to the survey deadline so that the OIR has an opportunity to review the survey response for consistency and accuracy with the College’s reporting practices.
  - If a Department needs to request an exception to this policy, it should request an exception from the ERMC or, if time does not permit, from the Dean of Faculty.

- In addition to the foregoing, for those external surveys that are identified as “major” or “high risk” institutional surveys by the ERMC (see below), the following additional procedures shall apply before the submission of any survey response:
  - That a copy of the proposed survey response is provided to the OIR at least 2 weeks prior to submission for review and cross-checking of responses against other reported data.
  - That the OIR will then work with the relevant VP to review and resolve any potential discrepancies or questions related to the survey response.
  - That, assuming that OIR and the relevant VP are able to resolve any questions, the survey may then be submitted.
  - That, in the event of any questions or concerns that are not able to be resolved, that such questions be brought to the ERMC for review and final determination.

- As of November 2012, the College has identified the following as “major” or “high risk” institutional surveys or reports:
  - Common Data Set
  - US News Surveys (including Main Statistical and Financial Aid Surveys)
  - IPEDS Surveys
  - Voluntary Support for Education (VSE)
Office of Institutional Research - Roles, and Responsibilities:

The OIR:

1. Serves as a repository for accurate, consistent, definition-driven data about Claremont McKenna College.

2. Provides thorough, thoughtful analysis of that data in consultation with various stakeholders to aid institutional decision making and reporting.

3. Strives to maintain an environment of transparent reporting and analysis in an effort to further the College’s understanding of its own role within American higher education.

4. Is CMC’s primary source for commonly requested factual information about the College for both internal and external reporting purposes.

In light of these affirmations, the OIR will:

1. Be the repository of all institutional data and surveys for the College.

2. Be the primary or secondary contact for all external surveys, when possible.

3. Clarify procedures to maintain accuracy, be a resource for best practices in data construction, and provide assistance and expertise for data projects as needed for the appropriately responsible offices of the College.3

4. Coordinate with the College’s Office of Public Affairs and Communications (“PAC”) on the fact-checking process related to media-responses and marketing-based materials produced on behalf of the College.

5. Make commonly requested survey data elements publically available on the IR website so that those completing surveys, replying to inquiries, or placing institutional data in publications will have easy access to data and related definitions.

6. Maintain an accessible list of data definitions used by the College for internal or external purposes.

7. Staff the IRC, which will be made up of invested stakeholders from those responsible offices to facilitate discussion of data issues at the College.

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3 For example, Admissions would be responsible for accurately recording standardized test scores, Registrar for grades, Development for contributions, etc
8. Provide the following to the ERMC:
   - An annual priority list for data that needs to be reviewed (e.g., red, yellow, green).
   - Information on any changes to the basic data definitions reported, whether from changes in standards, changes in questions, the introduction of new questions, etc.
   - Information on any changes to the College’s practice of data construction.

9. Refer all data construction issues, data discrepancies and highlighted data risk factors to the Dean of the Faculty given his/her role as the Chair of the IRC and as the Vice President that has oversight of the OIR.

Office of Public Affairs - Roles, and Responsibilities:

- PAC has the primary responsibility for promoting and responding to media inquiries related to the College, and for overseeing and managing all marketing and communications materials at the College, including the following “major” or “high risk” items:
  - Website
  - Undergraduate Admission Marketing Materials and Brochures, including financial aid and career services brochures
  - RDS Graduate Admission Marketing Materials and Brochures
  - CMC Magazine
  - Presidential Communications
  - News Releases

- In fulfilling this responsibility, the PAC is expected to develop written guidelines and procedures to document the fact-checking process of any institutional communication material prior to its printing or publication. In addition to direct fact-checking as necessary and appropriate with relevant departments or offices, this fact-checking shall also include a separate cross-check with OIR.

The Institutional Research Committee (IRC)

1. The IRC will be chaired by the Dean of the Faculty and staffed by the OIR.

2. In addition to the Chair, membership of the IRC will be composed of designated data representatives from the offices of Admission, Financial Aid, Development, Public Affairs, Career Services, the Robert Day School, Alumni and Parent Relations, Human Resources, Registrar, Athletics, and the Treasurer.
3. The IRC will meet every summer and winter in advance of peak data reporting time periods and periodically to review new surveys, changes to data definitions, etc. The IRC may meet other times as needed.

4. Statistical discrepancies reported to the Chair by any member of the IRC will be reported to the ERMC. The Chair IRC will act promptly to rectify any statistical discrepancy with the ERMC.

5. The Dean of the Faculty can authorize access to all raw data at the College, as needed for the committee to perform its duties. Such authority does not pertain to data on confidential financial data that are separately audited. The Dean of the Faculty will consult in this capacity with the ERMC.

6. The IRC will recommend approval of all surveys at the College that are used for official business to the ERMC for approval.

7. The Chair of the ERMC will report on data issues periodically with the College President, who is the final authority in all data and statistical reporting matters.

8. The Chair of the ERMC will also make periodic reports to the Audit Committee as necessary and appropriate.