



Student Demographic and Personal Identity, 5.1.50 College Policy

Applies to: Applicants, students, and alumni.

Responsible Office

Gateway – Enrollment Management

POLICY STATEMENT

This policy outlines Central Ohio Technical College’s (COTC) collection and management of personal identifiable information, and its commitment to an open and inclusive environment through the establishment of a chosen name, gender identity, and personal pronouns for use within college systems, where feasible. Not all college information systems, databases, and processes may be able to store or display these identifiers, and there may be situations that require use of the Legal Name or Legal Sex. Therefore, individuals who utilize a Chosen Name or Chosen Gender within college systems should always be prepared to reference their Legal Name and Legal Sex and provide corresponding identification when necessary.

Purpose of the Policy

To define the type of demographic information COTC collects, how it is used, and the process applicants and students use to update this information.

Definitions

Term	Definition
Chosen Name	The name a person would like others to use when addressing them, instead of their legal name, whenever possible.
Gender Identity	One's innermost concept of self as male, female, a blend of both or neither – how individuals perceive themselves and what they call themselves. One's gender identity can be the same or different from their sex assigned at birth.
Legal Name	A person’s full name as identified on government identification or legal documents.
Nickname	An informal name usually, but not always, based on an individual’s legal name used in place of legal first or middle names.
Legal Sex	Refers to the current designation on a person’s birth certificate, driver’s license, and/or U.S. state identification.
Personal Pronoun	The pronoun that a person wants others to use when referring to that individual.
Customer Relationship Management (CRM) Software	Software that enables COTC to manage relationships and communication with prospective students, applicants and students.

Policy Details

- I. Demographic Information Collection
 - A. COTC collects demographic information from inquiries/prospects, applicants and students through inquiry forms, event registration, application for admission, course registration and other official college forms and processes.
 1. Demographic information may include but is not limited to **Legal Name**, social security number (SSN), address, phone numbers, email address, birthdate, race/ethnicity, gender/sex, and citizenship.
 - B. This data is collected and maintained in the college’s student information system and/or **Customer Relationship Management (CRM) Software**. This data is used for a variety of purposes including state and



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federal reporting, communicating with prospective students, applicants, students and alumni, and enrollment processing.

1. COTC is committed to the privacy of its students and prospective students. The college adheres to federal regulations for protecting enrolled student information through the Family Educational Rights and Privacy Act of 1974 (FERPA) as outlined in the Privacy and Release of Student Education Records policy.
- II. COTC collects social security number (SSN) on the application for admission.
 - A. Federal law mandates that state departments of motor vehicles, tax authorities, welfare offices, and other governmental agencies request SSNs as proof the student is who they claim to be. However, the Privacy Act of 1974 requires that government agencies at the local, state and federal level disclose to each person whether submitting their SSN is required, details of the use of this information, and what the law or authority requires its use.
 - B. The Privacy Act stipulates that no one can deny a student a government service or benefit for failing to provide the SSN unless federal law specifically requires it.
 - C. With respect to admission, registration, and financial aid, COTC collects SSNs from its students for the following reasons:
 1. For use in processing admission applications, for purposes of identification, and for verification of student records.
 2. For use in administering federal and state programs and loans, including verification of eligibility. These programs include, but are not limited to:
 - a. Financial aid and other related loan programs.
 - b. Scholarship programs.
 3. For use in complying with IRS reporting requirements.
 4. For use in preparing student enrollment reports required to be submitted to the National Student Loan Data System under federal law.
 5. For use in providing official student transcripts to authorized third parties (i.e., educational institutions and employers upon receipt of required release) for student identification purposes.
 6. For enrollment verification and eligibility for health insurance coverage and other benefits, as requested by students.
 7. For submitting reports to federal and state agencies as required.
 - D. All COTC students and alumni are advised that SSNs are confidential and may only be released in accordance with applicable law (Federal Trade Commission, FERPA).
 - E. Applicants who do not want to provide their SSN should contact the admissions office for assistance with their application for admission.
- III. Legal Name, **Nickname**, and **Chosen Name**
 - A. COTC requires all applicants to use their legal name when submitting their application for admission.
 - B. Nicknames can be designated on the application.
 - C. Applicants and students can indicate a chosen name in instances where the first and/or last name a person prefers to be called is different from their legal name.
 - D. The college is committed to honoring a student's chosen name, but their legal name will be used in cases where required due to regulatory and mandated reporting.
 1. The legal name will be used in the following instances:
 - a. College transcript
 - b. Degree verification
 - c. National Student Clearinghouse
 - d. National Student Loan Data Systems



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- e. Student employment documents, such as paychecks, W2s, and other payroll documents
2. Chosen name can be used in the following systems/instances:
 - a. Canvas–Learning Management System
 - b. Email display name
 - c. Class roster
 - d. Communications from COTC through CRM software and texting
 - e. Official degree or certificate
 - f. Commencement program
 - g. President/Dean lists
- IV. Gender Identity and Personal Pronoun
 - A. For state and federal reporting purposes, COTC collects data demographic data on gender, specifically **legal sex**, on the application for admission. **Personal pronouns** are not collected on the application for admission.
 - B. Students have the option to select or maintain their **gender identity** on the application for admission or through the self-service feature in myCOTC.
 - C. Personal pronouns are displayed in Canvas, Student Planning, and the self-service feature in myCOTC.

PROCEDURE

- I. Demographic Information
 - a. A student is responsible for notifying the Gateway when there is a change in their legal name or contact information on file. Failure to keep contact information (address, phone and email) current can result in missing critical communication from the college.
 - i. A student whose name has been legally changed should complete a Personal Data Form and provide their updated social security card to the Gateway to verify any legal name changes.
 - b. A student can update their legal sex by providing a copy of their final court documentation to the Gateway indicating the change.
 - c. A student can update their contact information (address, phone and personal email) using the self-service feature in myCOTC.
- II. Social Security Number (SSN)
 - a. Applicants who do not want to provide a SSN on the application for admission should contact the admissions office to be provided with a student ID number to use in lieu of their SSN.
 - b. COTC is required to report information on enrolled students to various federal and state entities, including the National Student Clearinghouse. If an error on an individual SSN is returned to the college, the registrar will place a hold on the student account and request a copy of their SSN to verify it is correct.
 - i. An error may occur due to an incorrect SSN being reported on the application for admission or when an SSN reported is already assigned to another student.
- III. Update Personal Identity
 - a. Chosen Name, Gender Identity, and Personal Pronoun can be updated and maintained by the student online without any required documentation by using the self-service feature in myCOTC.
 - b. The registrar has the right to review and deny inappropriate or offensive names that would be deemed a disruption to the educational mission.

Responsibilities



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Position or Office	Responsibilities
The Gateway	<ol style="list-style-type: none">1. Maintain confidentiality per policy.2. Collect and maintain student demographic data.3. Process updates to legal name, address, phone number, personal email, etc. as requested.4. Verify appropriateness of chosen name.
Applicants/Students	<ol style="list-style-type: none">1. Provide demographic information2. Notify the Gateway and provide documentation as required when there is a change in legal name or contact information.

Resources

Privacy and Release of Student Education Records Policy: https://www.cotc.edu/sites/main/files/file-attachments/5.1.20_privacy_and_release_of_student_education_records_0.pdf?1616759764

Contacts

Subject	Office	Telephone	E-mail/URL
Veronica Porter, Registrar	Gateway – Registrar’s Office	740-755-7600	porter.1249@mail.cotc.edu

History

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