



Medical Education Data Request Policy

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Curriculum Phase:	All Phases
Author/Authoring Body:	Curricular Affairs and Accreditation & Analytics
Responsible Unit:	Accreditation & Analytics
Policy Contact:	Accreditation & Analytics Office
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Summary

This policy is intended to protect medical student confidentiality and provides restrictions on requests for and use of College of Medicine – Tucson (COM-T) undergraduate Medical Education Data for research and program improvement purposes. Data requests must be submitted to and approved by the Accreditation & Analytics Office. Medical Education Data must be used in a manner that protects student confidentiality.

Related LCME Standard: 11.5 Confidentiality of Student Educational Records

At a medical school, medical student educational records are confidential and available only to those members of the faculty and administration with a need to know, unless released by the student or as otherwise governed by laws concerning confidentiality.

Applicability & Scope

This policy applies to any parties internal to the University of Arizona who request and/or make use of undergraduate Medical Education Data. External requests should be directed to [University of Arizona Public Records](#). Requests for graduate medical education data should be directed to the [Office of Graduate Medical Education](#).

Definitions

Educational Affairs – For the purposes of this policy, Educational Affairs comprises the Offices of Curricular Affairs, Student Affairs, Admissions, and Accreditation & Analytics.

Data, Medical Education Data – Refers to any data related to undergraduate medical education, including but not limited to student records, assessments, course evaluations, and surveys.

Data Requestor – The individual requesting access to Medical Education Data, either for their sole use or on behalf of themselves and one or more collaborators who would also access/use the Data.

Policy Statement

I. Data Requests

- A. All requests for Medical Education Data must be made directly to the Accreditation & Analytics Office by completing a [Medical Education Data Request Form](#).
- B. Data may be requested for research purposes and for improvement of the COM-T's educational programs.
- C. All Data requests must include the following:
 - 1) Data requestor contact, title/position, and affiliation information,
 - 2) the type and preferred format of Data requested,
 - 3) the reason(s) for requesting the Data,
 - 4) the names and contact information for all individuals who will have access to the Data,
 - 5) how the Data will be used (including a timeline),
 - 6) how the Data will be secured, and
 - 7) (if applicable) proof of Institutional Review Board (IRB) approval and a copy of the IRB protocol.
- D. The Accreditation & Analytics Office will approve, deny, or request additional details in order to make an informed decision.
 - 1) The Accreditation & Analytics Office will render decisions in consultation with Educational Affairs leadership, as appropriate.
- E. Data Requested for Research Purposes
 - 1) IRB approval is required prior to the release of any Data that will be used for research.
 - 2) IRB approval for use to Data does not override a decision rendered by the Accreditation & Analytics Office as described in this policy.
 - 3) Any changes to the IRB protocol must be communicated promptly with the Accreditation & Analytics Office.
 - 4) Any Data sharing with investigators outside of the University of Arizona must be approved by both the IRB and the Accreditation & Analytics Office.

II. Data Security and Confidentiality

- A. Medical education Data must be stored in accordance with the UArizona [Human Subjects Protection Program \(HSPP\) Data Management guidelines](#).
- B. Medical education Data must be used in a manner that protects learner confidentiality.
- C. All individuals who request or will have access to Data must demonstrate understanding of the [Family Educational Rights and Privacy Act \(FERPA\)](#).

III. Access to Data

- A. The Accreditation & Analytics Office will only provide access to Medical Education Data for which Educational Affairs is the primary owner.
- B. Data requests will be fulfilled based on the Accreditation & Analytics Office's current priorities and the complexity of a request.
- C. All provided Data will be de-identified, using unique identifiers, and aggregated, as appropriate, in accordance with [FERPA](#) and to protect learner confidentiality.

- D. Current University of Arizona medical students and residents cannot be granted access to any former or current College of Medicine – Tucson student or resident demographic or performance data, regardless of its format.
- E. The Data Requestor and all parties who will have access to the Data must read and sign a Medical Education Data Use Agreement (DUA).

Procedures

I. Completing a Data Request

- A. All requests for Medical Education Data must be made through the [Medical Education Data Request Form](#).
- B. If a request is approved, the Accreditation & Analytics Office will distribute a Medical Education Data Use Agreement (DUA) to be read and signed by the Data Requestor and all parties who will have access to the Data.
- C. Provided that all requirements for a Data request are met, including all parties signing a DUA, the Accreditation & Analytics Office will aim to deliver the Data within 15 business days.
 - 1) Requests for datasets that require extensive effort to prepare (e.g., de-identification) may take additional time to fulfill.

Related Information

Forms

- [Medical Education Data Request Form](#)

Resources

- [Family Educational Rights and Privacy Act \(FERPA\)](#)
- [UArizona Research, Innovation & Impact](#)
- [UArizona Public Records](#)

Revision History

- 5/23/2024:** The Vice Dean, Medical Education approved revisions to the policy, which focused the policy on data requests for undergraduate medical education data.
- 4/14/2022:** The Tucson Educational Policy Committee approved the original policy (Medical Education Research & Scholarship Data Policy).