Medical Education Data Request Policy

Category: 0-Other
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 (FEPRA)
   ▪ 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).