

Loyola University Chicago
SMALL CELL SUPPRESSION POLICY
Office of Institutional Effectiveness
Last Updated July 19, 2024

Approved by Provost Doug Woods on July 19, 2024

SCOPE

This policy covers all public-facing reports, data analysis views, and dashboard views that may contain data sufficient to disclose the identities of individuals (students, faculty, and staff) when group sizes are small. This policy does not apply to data provided for internal use only or data needed by employees with a legitimate educational interest to perform their official job duties.

PURPOSE

This policy ensures there is no unintentional disclosure of personally identifiable information through aggregated data.

LEGAL BACKGROUND

FERPA requires schools to protect student privacy in various ways, including avoiding unintended disclosures that may inadvertently allow individual students from being identifiable. FERPA does not specify the size of a group below which data must be suppressed to ensure compliance. This policy does not supersede FERPA guidelines, but rather is written as an addendum to FERPA.

POLICY

Primary Suppression

When student, faculty, and/or staff data are provided for public consumption, groups of five (5) or fewer will be suppressed and a note will be provided to indicate that such values have been suppressed to protect individual privacy.

Primary suppression will be implemented as of August 1, 2024.

Secondary Suppression

When, after primary suppression, the value of that cell can be determined by simple mathematical calculations on the remaining data, the next smallest cell will be likewise suppressed to prevent the recovery of suppressed cell values along with a note stating values have been suppressed to protect individual privacy.

Secondary suppression will be implemented as of January 1, 2025.

DEFINITIONS

FERPA: Family Educational and Privacy Rights Act (20 USC 1232g)

REFERENCES

[20 USC 1232g: Family educational and privacy rights \(house.gov\)](#)

<https://www.luc.edu/regrec/aboutus/ferpa/>

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

<https://www.uh.edu/education/research/institutes-centers/erc/proposal-preparation-and-submission/Masking-Techniques-and-Guidelines.pdf>

https://studentprivacy.ed.gov/sites/default/files/resource_document/file/FAQs_disclosure_avoidance_0.pdf

<https://nces.ed.gov/pubs2012/2012151.pdf>

<https://policy.umn.edu/it/securedata-proc05>

<https://cte.uic.edu/wp-content/uploads/sites/51/2018/08/ISBE-Data-Access-and-Use-Policy-and-Procedures.pdf>