Investigators conducting studies involving Michigan State University (MSU) students may propose to request that student subjects provide their personal identification number (PID), social security number (SSN), or driver’s license number. This may be done as a means to use a number unique to each subject in order to relate responses either over time or over several data gathering instruments. While the purpose is understandable, the use of these numbers for such purpose is usually inappropriate. The PID, SSN, and driver’s license are confidential pieces of personal information and should not be routinely requested when many other schemes for uniquely identifying subjects are available.

In other instances, the PID is requested as a means to gain access to data about students from the MSU Student Information System (SIS). This may be done to avoid asking students directly for demographic or academic information that is maintained in the SIS. Requests to use student data at MSU are subject to federal requirements such as the Family Educational Rights and Privacy Act (FERPA) and university requirements. See the Human Research Protection Program Manual 2-2-D “U.S. Department of Education” for FERPA requirements.

When use of MSU student data is proposed, the IRB implements the following practice which is grounded in MSU’s Access to Student Information in the General Information, Policies, Procedures and Regulations section of the Academic Programs document.

1. The MSU Access to Student Information guidelines provide clarity to what limited data elements are considered directory or public information, whereas all other data elements are considered confidential. Students may request that even the directory information be considered confidential.

2. Researchers are reminded that even though they may have routine access to the sought after data about students in their classes or in their college, such access is provided to support the students’ academic progress, not the researcher’s studies; thus, researchers must either have:
   - Written permission from each subject authorizing access to specified data elements even where the information might otherwise be available to the researcher.
• Authorization as specified under the provisions of the “Disclosure to Third Parties of the Access to Student Information” policy to access data without specific student consent.

3. If consent from the student will be obtained:
   • Each student subject must be informed of any and all data elements that are intended for inclusion in the research study.
   • When a student subject is asked for a PID, he/she must be informed explicitly of how the PID will be used, i.e. what data elements in addition to those provided by the student in the course of the research study would be obtained.

4. Those researchers that have routine access to SIS data about students in support of their administrative or academic support duties do not automatically have authorized access to such data for use in conjunction with research activities. Where there is any question, the researcher should consult the Registrar’s office.

5. To gain student information from the Registrar’s office please review the Procedure to Request Confidential Student Data in Support of University Research.