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DIRECTOR SUSAN WILBUR  
Admissions and Outreach

Re: StatFinder and Public Data Display and Privacy Issues

You have asked for an updated evaluation of the privacy protections of the public portion of the StatFinder web site, following the receipt of additional privacy analyses and a policy determination to use a threshold of 5 individuals per cell for aggregation. I have carefully reviewed the parameters of the project and the type of data that will be displayed to the public, as well as the updated privacy analyses conducted by staff and the vendor. The StatFinder site appears to be fully consistent with all applicable federal and state privacy laws and regulations, and with all relevant University privacy policies.

The original and updated privacy analyses indicate that the site will not make the individual identity of any student or applicant "easily traceable," as would be prohibited by the Family Educational Rights & Privacy Act (FERPA), the California Information Practices Act (IPA), and University policy. Rather, the data produced by the site will protect information about "small cell sizes" at a threshold of 5 individuals per cell; the data will be aggregated to avoid release of such "small cell sizes." The selection of the threshold of 5 appears reasonable, given the constrained nature of the data being produced (e.g. the aggregation of small cell sizes, the fixed bands of SAT scores, the fixed identity of fields available, etc.) There does not appear to be any legal or policy prohibition that would bar you from proceeding with the public portion of StatFinder, using a "small cell" threshold of 5, if as a matter of policy you wish to proceed.



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cc: S. Agronow  
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