# Introduction

While Aggregate Data is not Personally Identifiable Information (PII), there are still risks of violating a student’s privacy without appropriate safeguards. The most common method for disclosure avoidance of aggregate data is defining a minimum cell size and masking data that falls below the minimum.

Idaho Code 33-133 authorizes the State Board of Education to set the minimum cell size. Idaho State Board of Education, Data Management Council (DMC) Policies and Procedures currently sets this at 5.

In some instances, the importance of the data is very high or the risk of exposure is very low. In these cases, exceptions may be required to publish the data. The DMC is authorized to approve exceptions to the masking requirements.

## Current Ongoing Exceptions

These exceptions were approved by the DMC and may be used in publishing student aggregate data.

<table>
<thead>
<tr>
<th>Date:</th>
<th>January 6, 2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exception:</td>
<td>The Office of the State Board of Education (OSBE) and the State Department of Education (SDE) may submit to the federal government required data for existing reporting requirements. OSBE and SDE will report to the DMC about these submissions and provide a brief description of the purpose and the type of data contained in each report.</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>Date:</th>
<th>April 26, 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exception:</td>
<td>Aggregate enrollment data with no student outcomes does not need to be masked. This can include the school, grade level, gender, and race/ethnicity. Normal masking rules apply when any other identifying or education outcome information is included.</td>
</tr>
</tbody>
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<tr>
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<tr>
<td>Exception:</td>
<td>Aggregate assessment participation data does not need to be masked at the school, grade, and test level. The exempt exams are the Idaho Reading Indicator (IRI), Idaho Standards Achievement Test (ISAT), Advanced Placement (AP), Preliminary Scholastic Aptitude Test (PSAT), American College Testing (ACT), and the Scholastic Aptitude Test (SAT). Normal masking rules apply when any other identifying or education outcome information is included.</td>
</tr>
</tbody>
</table>
Idaho State Board of Education – Data Management Council
Aggregate Data Masking Exceptions

Date: December 1, 2017
Exception: Four-year adjusted cohort graduation rate (ACGR) doesn’t need to be masked at the school level. Normal masking rules are followed when ACGR is broken down in any way.

Date: December 1, 2017
Exception: The number of students that graduate from an Idaho high school doesn’t need to be masked at the school level. Normal masking rules are followed when the number of graduates is broken down in any way.

**One-Time, Updated, and Expired Exceptions**

These exceptions were approved by the DMC. They were either one-time only exceptions, ongoing exceptions that have been updated, or ongoing exceptions that have been revoked. They may not currently be used in publishing student aggregate data.

Date: February 3, 2016 to December 1, 2017
Exception: If there are 10 or more seniors in a high school class and 4 or more graduates, high school graduation outcomes, at the school level, do not have to be masked.
Comment: This exception was updated.

Date: April 16, 2016
Exception: Approved the release of SAT data to the Treasure Valley Education Partnership (TVEP). Unmasked SAT data in two groups. One group would include the TVEP schools and the other would include all other schools in the state.
Comment: One-time exception.

Date: April 16, 2016
Exception: Approved the release of counts of Hispanic students by school district to Priscilla Salant of the University of Idaho (UI).
Comment: One-time exception.