Monitoring Report II: Treatment of Members

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The information and data contained in this report covers the period of July 1, 2018 to June 30, 2019 unless otherwise noted.

I certify that the information contained in this report is true.

Christine M Keller, Executive Director & CEO  Date

Global Policy Language

The Executive Director will not cause or allow the inhibition of members’ participation, as appropriate, in Association functioning. With respect to interactions with members, the Executive Director will not cause or allow conditions procedures, or decisions that are unsafe, undignified, or unnecessarily intrusive.

Interpretation 1

95% of all AIR members will receive email communications announcing AIR’s call for volunteers.

Rationale 1

To encourage members’ involvement in their Association, AIR has an annual open call for volunteers, which is advertised with several email messages and notices on the website. AIR regularly communicates with members through email and consistently monitors and updates email addresses to ensure delivery. Thus, email is an appropriate and expected way to encourage members to engage with the Association.

Evidence 1

99.7% of members received three “Call for Volunteers” communications for the 2018-19 membership year that were disseminated in August and September of 2018.

Interpretation 2

AIR will provide opportunities for participation in the Association that are open to all members. The annual call for volunteers includes peer reviewer roles such as engaging with different types of content to provide feedback, ideas, and resources; serving on focus or work groups; or advising the AIR Executive Office on a variety of topics.

Rationale 2

The opportunities highlighted below are examples of efforts to ensure that all members, regardless of experience or expertise, are afforded opportunities to engage with the Association. (The participant counts

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during the last membership year are included as evidence that participation is “not inhibited” rather than as indicators of a “correct” or “ideal” level of participation.)

Evidence 2
- 145 members served as peer reviewers
- 78 members served on Forum advisory groups
- 74 members served on eAIR advisory groups
- 231 members served as proposal reviewers for the 2019 Forum
- 34 members served on the Data Policy Advisory Group
- 6 members served on Professional Files Advisory Group

Interpretation 3
AIR will provide opportunities for members to submit content through peer review processes for inclusion within a variety of AIR products and events.

Rationale 3
Example opportunities to submit content through peer review processes include eAIR stories and features, Professional File articles, and Forum proposals. This type of participation provides substantive ways for AIR members to contribute value to the Association and the field. (The participant counts during the last membership year are included as evidence that participation is “not inhibited” rather than as indicators of “correct” or “ideal” level of participation.)

Evidence 3
- 259 members submitted proposals for the 2019 Forum
- 386 members presented sessions during the 2019 Forum
- 44 members conducted workshops during the 2019 Forum
- 83 members contributed to eAIR in 2018-19
- 13 Tech Tips were produced in 2018-19
- 1 Professional File volume was produced in 2018-19, which included 2 articles

Interpretation 4
The Executive Office’s support of the nominations and elections process will result in an annual non-contested certification of the election by the Nominations and Elections Committee.

Rationale 4
The Board is ultimately responsible to ensure that the Association has a fair nominations and elections process that aligns with the Constitution and Bylaws. The Board has delegated support for this process to the Executive Director.

Evidence 4
- 489 members (out of 3198) voted in the Spring 2019 Board elections.
The election results were duly certified March 2019 for the 2019-20 Board and Nominations and Elections Committee positions.

**Interpretation 5**
The Forum registration process will include questions regarding food allergies and dietary restrictions. As part of venue selection for Forum, hotel contracts will guarantee compliance with ADA requirements. The proposal process will include questions regarding accommodations and requests for reasonable accommodations from attendees.

**Rationale 5**
Fulfilling requests for reasonable accommodations, food allergies, and dietary restrictions and selecting Forum meeting venues that meet ADA requirements help ensure that AIR members can fully participate and can do so under safe and supportive conditions.

**Evidence 5**
The Executive Office has established procedures for individuals to request reasonable accommodations for dietary restrictions and accessibility at the Forum. As an example, 230 requests regarding food allergies and dietary restrictions were addressed during the 2019 Forum. Three ADA-related accommodations were requested and fulfilled in 2019.

**Interpretation 6**
All Forum attendees will agree to abide by a code of conduct that prohibits threatening physical or verbal actions; disorderly or disruptive conduct; and harassment of any kind. The code of conduct will include a straightforward and confidential mechanism for reporting violations to AIR staff and a common understanding of the resulting consequences.

**Rationale 6**
A code of conduct and an appropriate accountability process helps to set the expectations for professional behavior during the annual Forum to create culture of mutual respect and to facilitate safe and dignified conditions that facilitate learning, sharing, and networking for all attendees. While it is impossible for AIR to guarantee there will be no violations, it is reasonable for AIR to implement measures that contribute to an atmosphere of respect and collegiality at AIR’s largest in-person event. The American Society of Association Executives (ASAE), recommends establishing enforceable conduct guidelines for annual conferences, publishing the guidelines with registration materials, and reserving the right to eject any violators as part of association best practices to avoid legal liability and to better ensure a positive experience for attendees.

**Evidence 6**
A code of conduct for the 2019 Forum was included as part of the conference registration materials: [https://www.airweb.org/forum/2019/attendee-resources/code-of-conduct](https://www.airweb.org/forum/2019/attendee-resources/code-of-conduct). No violations were reported to AIR staff.
A. Policy Language

The Executive Director will not: Cause members to be unaware of the membership categories, dues, voting privileges, and access to Association services.

Interpretation 1

Information on membership categories, costs, and benefits will be readily available as part of membership purchases.

a) AIR membership purchase forms will provide a full list of membership categories and the annual dues fee for each category.
b) E-commerce web pages related to membership purchases will provide a full list of membership categories and the annual dues fee for each category.

Rationale 1

The above interpretations are appropriate as most members (98%) purchase their memberships online or use PDF membership forms. Both options present information about the various membership options and the individual must select the membership category he/she wishes to purchase. In doing so, the individual confirms acknowledgement of the cost and benefits of the selected membership type.

Evidence 1

a) 100% of forms used for membership purchases include membership categories.
b) 100% of e-commerce web pages related to membership purchases include membership categories.

Interpretation 2

Emails to members regarding the nominations and elections process will have a delivery rate of 95% or better.

Rationale 2

To ensure members are aware of their voting privileges, emails must reach them at a reasonable rate. Standard email delivery rates for non-profit organizations range from high (98%) to very low (69%). AIR selected 95% as a delivery rate because most of members have institutional email accounts on stable technology platforms. AIR monitors email delivery rates, reviews bounced emails, and corrects errors. Routinely this process involves communicating directly with members to confirm their email addresses.

Evidence 2

99.6% delivery rate for the 16,838 emails sent to members about nominations and elections

Interpretation 3

A sample of emails sent to members regarding key AIR services and opportunities (Forum, member benefits, and volunteer opportunities) will have a delivery rate of 95% or better.

Rationale 3

To ensure members are aware of the services available to them, AIR emails must reach them at a reasonable rate. Standard email delivery rates for non-profit organizations range from high (98%) to very low (69%). AIR
selected 95% as a delivery rate because most of our members have institutional email accounts on stable technology platforms. The Executive Office monitors email delivery rates, reviews bounced emails, and corrects errors. Routinely this process involves communicating directly with members to confirm their email addresses.

**Evidence 3**
- 99.7% delivery rate for the 7,453 emails sent to members about *volunteer opportunities*.
- 99.6% delivery rate for the 2,095 emails sent to members about the *opening of Forum registration*.
- 99.6% delivery rate for the 23,592 emails sent to members about *Forum registration*.
- 98.7% delivery rate for the 3,572 emails sent during the *kickoff for membership renewal campaign*.
- 99.5% delivery rate for the 12,338 emails sent to members during the *renewal campaign*.

**B. Policy Language**
*The Executive Director will not: Treat members in a manner that does not align with commonly accepted business practices.*

**Interpretation 1**
Technology infrastructure will be updated and maintained in a manner that permits the Executive Office staff to follow common business practices and to provide high levels of customer service for members.

**Rationale 1**
Appropriate investments in technology provide an important foundation for AIR staff to provide appropriate and consistent levels of business services to members – e.g. financial transactions, membership renewal, registration for events, accurate member contact information, and routine communications.

**Evidence 1**
The new association management system and website launched in February of 2019 provides the backbone for reliable AIR business services and an upgraded user experience. For example, the “up time” for the systems and website have increased through a redundancy of data centers and is no longer vulnerable to outages caused by storms in Tallahassee. The user experience will continue to be streamlined and improved as the new technology and processes are further integrated into AIR operations.

**Interpretation 2**
At least 75% of Forum attendees will be satisfied with the level of service provided by AIR staff and business processes as measured by responses to the conference evaluation.

**Rationale 2**
As the Forum is the largest gathering of AIR members each year, it is reasonable to use the evaluation results from attendees as an indicator of the perceived quality of AIR services, processes, and practices by AIR members.
Evidence 2
At least 85% of 2019 Forum attendees were satisfied with the level of service in the areas of registration, communication, and overall service.

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<thead>
<tr>
<th></th>
<th>2019 Forum</th>
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<tbody>
<tr>
<td></td>
<td>Dissatisfied</td>
</tr>
<tr>
<td>Onsite registration process</td>
<td>2%</td>
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<tr>
<td>Online registration process</td>
<td>4%</td>
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<tr>
<td>Communications in advance of the conference</td>
<td>5%</td>
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<tr>
<td>Service from the AIR staff during Forum</td>
<td>2%</td>
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C. Policy Language
The Executive Director will not: Elicit information for which there is no clear necessity.

Interpretation 1
AIR will comply with the requirements of the European Union’s General Data Protection Regulation (GDPR) regarding information that is requested from users (including members).

Rationale 1
GDPR applies to organizations operating in the European Union (EU) as well as any organization outside the EU that offers products or services to EU citizens, which includes AIR. GDPR compliance requires AIR to document that personal data is gathered under well-defined conditions and to be transparent and clear about how an individual’s personal data is used by the Association.

Evidence 1
In 2017-18, AIR reviewed and updated its data gathering protocols to comply with GDPR and users (including members) within the EU were notified of the necessity of “opting in” to continue to receive AIR emails. Further, the AIR privacy policy outlines the data we may request, how we may use it, and whom we may share it with (https://www.airweb.org/privacy-policy). Instructions for any user to update their information, or "request to be forgotten" have been included. As the AIR data governance policy is further developed with the implementation of the new association management system, users will be notified how long each data element will be retained, if they do not request to be “forgotten.”

Interpretation 2
The Executive Office will have guidelines for information requests sent to members, including the use of targeted selection criteria, segmentation, frequency of inquiries, and the potential value of the information collected for members and the field.
Rationale 2
It is common for AIR to receive requests from external organizations about the characteristics of AIR members or the prevalence of certain practices at institutions or other informational inquiries. AIR also engages in its own research about AIR members to better understand their needs and concerns to tailor services, activities, and advocacy. The established AIR practice of controlling the number of survey requests sent to individual members helps to strike an appropriate balance between the legitimate need to collect information for the benefit of members and the field with awareness for the limited time and resources of AIR members.

Evidence 2
The protocol for research surveys is to draw a random sample of 500 members - typically across sectors unless there is a survey that requests a specific population (e.g., community colleges, directors of IR, etc.). The Executive Office strives to limit the number of research surveys sent to an individual member to no more than four surveys per year, except under special circumstances. No members received more than four requests during the reporting period.

D. Policy Language
The Executive Director will not: Use methods for collecting, reviewing, transmitting, or storing member information that fail to protect against improper access to the material elicited.

Interpretation 1
AIR will meet the requirements of the European Union’s General Data Protection Regulation (GDPR) for the collection, protection, and storing of personal information from individuals, including members.

Rationale 1
GDPR applies to organizations operating in the EU as well as any organization outside the EU that offers products or services to EU citizens. Meeting the terms of the GDPR requires that AIR’s process for the collection and management of personal data has safeguards to protect it from misuse and exploitation as well as protocols that respect the rights of data users.

Evidence 1
Although only a small number of EU citizens are AIR members, AIR reviewed and updated its protocols, including a new privacy policy (https://www.airweb.org/privacy-policy) with detailed information on how personal information is collected, stored, and used in May of 2018. Compliance with GDPR requirements is built into the new association management system and provides assurances that AIR will remain current on any changes or additions to the regulation.

Interpretation 2
a) AIR will maintain and use a bank-operated direct processing service for orders sent by mail.

b) There will be no lapse of certificates assuring that AIR servers use HTTPS security for electronic processing of financial transactions.
c) AIR will utilize tokenization for all credit card transactions, limiting the use and local storage of actual credit card information by using a randomly generated number.

d) AIR staff will be trained on the prohibition of electronically saving, storing, or emailing social security or credit card numbers.

Rationale 2
AIR collects directory information from all members, as well as additional information from some members, such as individuals who submit Forum proposals and grant applications. These types of information are provided by members with the understanding the information will be shared with other members, reviewers, etc. so are not considered sensitive information that warrants auditable protection against access beyond the normal conditions used in handling “directory information.” As such, this interpretation focuses on credit card and financial information, which is the only “sensitive” data collected from members.

Note: Social security numbers are only collected from individuals who receive payments for services rendered to AIR. A typical member does not receive payment from AIR that require completing W-9 or similar documents that require social security numbers unless the member is also an AIR contractor. No social security numbers are stored electronically and are securely stored in a locked filing cabinet. (The protection of that information is monitored under the Treatment of Staff Monitoring Report.)

AIR takes the threat of identity theft seriously, which includes the need to protect members’ credit card information. AIR handles members’ credit card information during the purchasing process, either through the e-commerce system or the mail. To ensure protection of members’ credit card and financial information, it is reasonable to safeguard access to the following.

- Credit card numbers submitted electronically (passed through AIR web links)
- Physical checks and their associated checking account numbers
- AIR staff members’ incidental exposure to credit card and financial information when members do not follow established practices

Evidence 2
a) AIR had a bank-operated post office box dedicated to AIR mail orders and payments throughout the reporting period with no gaps.

b) No incidents of expired security certificates that protect servers performing financial transactions.

c) AIR used tokenization for electronic storage of credit card information on AIR Servers throughout the year without any gaps. There was no electronic storage of actual credit card information.

d) The appropriate process for handling credit card information is documented, reviewed at least annually, and distributed to staff.

Interpretation 3
Member directory information will be appropriately protected and stored using technological tools and established organization protocols, including the following.
a) Member lists will not be publicly available on the AIR website and access requires a login and password, in conjunction with an active membership.

b) Member directory lists will not be sold by AIR to commercial entities.

c) Member lists can be shared on a case-by-case basis with researchers through an application process. Any resulting agreement to share data will include appropriate constraints on how the data will be used and attributed.

**Rationale 3**
The practice of limiting access to member contact information to other members behind a login, prevents web crawlers and scrapers from gathering member data without permission. Even with a member login, member lists cannot be downloaded in their entirety but can only be accessed through individual searches. The inability to download complete member lists guards against companies or individuals purchasing an AIR membership for the express purpose of gaining access to a member list. The option for sharing AIR member data with researchers provides the flexibility for AIR to support credible research that may advance higher education, support the field of IR or benefit AIR members.

**Evidence 3**
No breaches of membership information occurred during the reporting period and no directory information was sold to a commercial entity. The Executive Office did not receive any complaints of membership data being used inappropriately.