Reshaping Fundraising Data Storage?: Changing Perspectives on Keeping Data in an Age of Breaches

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And with credit and thanks to…

- Amy Daultrey, Software Services Consultant
  - amydaultrey.com

- Vered Siegel, CFRE, Senior Director, Systems, CCS Fundraising
  - ccsfundraising.com

Agenda

- What brings us to this discussion: history helps
- Why we keep data
- Why we would delete data
- Methods for deleting data
- Deciding what to do

The 1980s: we can track data more easily

- DOS fundraising databases become available
- Simple = name, address, phone, basic gift information
- Systems are sold based on *user* count

The 1990s: we can track and get more data

- Databases become more common, grow in use and capability
- Rise of the prospect research profession (Apra founded 1987)
- Third-party companies sell us data (Target Analytics founded 1989, WealthEngine in 1991)

The 2000s and 2010s

- The rise of fundraising online, and the data that comes with it
  - Email
  - Websites
  - Donation pages
  - Peer-to-peer
- More fundraising database products, apps, services, etc.
- Scanning becomes mainstream
- Hardware becomes faster and storage costs plummet
- We just keep getting and keeping more and more data

But…

- The collection and storage of data was not unfettered…
- We still had FERPA (1974), HIPAA (1996), and PCI (2004)
- Prospect researchers: ethics of collecting data
- Database users: no hearsay or gossip, “donors can see it”
- Awareness of sensitive fields like SSN/national IDs, etc.

And…

- GDPR (General Data Protection Regulation) in 2018 in Europe
- The pandemic in 2020 and an explosion in ransomware attacks
- **But no one is providing any direction on what or how**

Finally

- DEI concerns regarding the collection, storage, and use of data
  - Assumptions re: constituents, use of data
  - https://www.advserv.org/dei-for-advancement-services-2024

- AI: more data to inform the model, but don't make our data public!
  - https://www.philanthropy.com/package/a-i-and-fundraising-the-future-is-here

Finally continued

- U.S. national and state privacy legislation
  - Smaller database less likely to be subject to legislation
  - Recommend: https://www.amydaultrey.com/resources.html

- The environmental cost of storing data
  - E.g., https://thereader.mitpress.mit.edu/the-staggering-ecological-impacts-of-computation-and-the-cloud/

So where does that leave us?

- Aaaaaaaaaaaaaahhhhhhhhhhhhhhhhhhhhhh!!!!!!!!!!!!!!
- Pushed and pulled both ways and there's no consensus on what to do or how to do it; there is a leadership vacuum, and it is on us to begin to fill it.
- So, what do we do?

First, consider your database options

- Delete a constituent, delete their entire history: gifts, etc.?
- Inactivating?
- You can't export complete CRM data to a spreadsheet (1:∞)
- You can archive databases, but this is more expensive and technically complex
- Ensure sensitive data is in encrypted fields
- Anonymize the constituent? Doesn't help with record count
- Move gift records under umbrella records?
    - Anonymize or not?

Second, are you considering deleting…

- Entire records

- Data within records
  - Name and specific contact information (address, email and phone)
  - Sensitive data like dates of birth, SSNs and their equivalents
  - DEI-related fields like Gender, Ethnicity, and Religion
  - Education and health information
  - Notes and Contact Notes with possibly sensitive data
  - Transactional information?

Pros and cons of keeping/deleting

Pros of keeping	Pros of deleting
More reporting	Possibly lower vendor costs
More analysis	Likely less risk in case of loss
More information	Likely less work if laws change
More history	Lower cost to environment
Perhaps more and better prospects	Lower data analysis costs?
Elephants never forget…	…But squirrels do!

What does Bill think you should do?

- As fundraiser and data person, I prefer to have data than not: I prefer to **keep** what we've collected and use legally and ethically
- I prefer to not live in fear but be smart about avoiding the worst case
  - Storing data properly
  - Focusing on other cybersecurity practices
- I prefer to stay informed and be ready and able to respond as the situation changes
- **But I always prioritize doing right by our constituents first, and of course, following all legal requirements and ethical principles**

What does Bill think you should do? continued

- This is not an excuse for keeping junk: document the meaning and value of every field or code or delete it. For example:
  - Custom fields
  - Table values
- Keep it in the database or permanently delete it
- Minimum to do:
  - Security!
  - Policy and procedure on “take me out of your database”

What does Isaac think you should do?

- Listen to Bill!
- Name the monster! Which risks and costs keep up at night?
  - Privacy violations in case of breach?
  - Regulatory compliance?
- Consider your use cases and make incremental changes first
- Minimize what you store about low-scoring constituent
- Don’t go it alone, data governance is an org-wide initiative
- **Don’t get trapped into all-or-nothing thinking**

How to go about this

What if the question arises or you feel the need to raise it?

- First, why are you thinking about it? That will determine what issues and approaches are relevant
  - Data usage: constituent harm reduction
  - Record costs: cost reduction
  - Privacy laws: legal concerns
  - Breach concerns: constituent harm reduction *and* organizational risk management
- The database manager must have a voice at the table, but involve fundraising and organization leadership, IT, legal
  - What are your data governance practices?

How to go about this continued

- Consider the pros and cons
  - As discussed in this presentation
  - *Really* discuss it
    - For example: Although we have a history in our profession of keeping data, is now the time to ask, very realistically, what harm would truly be created by deleting data? For example, if someone has been a non-donor for so long that we thought it acceptable to delete them, and they give again, do we *have* to know that or can we just treat them as a new donor?

How to go about this continued

- Recognize there is no industry consensus, no “best practice”
- It doesn’t have to be all or nothing
- Think about the long-term consequences, don’t be penny-wise and pound foolish
- Adopt and document a formal policy to protect yourself against future downsides
- This applies not only to your fundraising CRM, it also applies to all instances of constituent data: email, online donation and event systems, spreadsheets, paper files, etc.
- Determine whose responsibility it is to monitor changing trends and laws (may be more than one person)

A thoughtful example from Vered

Let's say that you've decided that you are no longer going to track the religion of your constituents. What do you do with the data on religion that you *already* have?

(a) Erase it, globally delete the Attribute, and move on as though this data never existed.

(b) Stop collecting, but keep the old data. Export it into some password-protected file, to get it out of the database, or just leave it there and inactivate the field.

If (a), how do we prevent future staff from trying to track it again? If (b), what are the costs of storage and access, and are they worth the risks?

What does implementation of these two strategies look like? What are the situational and tactical differences between stopping something you've been doing, versus rolling it back so it looks like it never happened? Whose interests are we representing?

Vered Siegel, CFRE, Senior Director, Systems, CCS Fundraising

Thank you!

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Free documents that do **not** ask you to give your contact information are available at billconnors.com/resources, including the original white paper while I await feedback from this conference on this topic.

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