

Denominational Data Sharing

GENERAL COUNCIL ON FINANCE AND ADMINISTRATION OF THE UNITED METHODIST CHURCH

Revised: 10/30/2025

In accordance with ¶807.14 and ¶807.15 of *The 2020/2024 Book of Discipline*, the General Council on Finance and Administration is charged by the General Conference with collecting, processing, and distributing certain authoritative data on the people, entities, and ministries of the United Methodist Connection, as well as maintain the authoritative database.

In accordance with the letter and spirit of ¶ 807.14 of *The 2020/2024 Book of Discipline*, access to some elements of personal and address/contact information shall be restricted as determined by this policy to protect against data misuse and to promote quantitative data collaboration among the United Methodist Connection. The goals of denominational data sharing are:

- Address challenges with sharing data with the connection and streamline the agreement process.
 - Promote GCFA as a steward for the data and encourage sharing with the denomination while protecting the data commensurate with its sensitivity.
 - Ensure there is a mechanism to address data quality with those who use the data.
 - Provide a mechanism to share sensitive data and ensure all parties are aware of safeguarding requirements specific to data being shared.
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Definitions

- **Entity**: Any organization, agency, conference, district, church, or institution affiliated with The United Methodist Church.
 - **Third Party**: Any external organization or individual not directly affiliated with GCFA or other denominational entities, including vendors, research institutions, and ministry partners.
 - **Consolidated Data**: Data compiled from multiple sources into a single dataset, typically organized by category or type.
 - **Aggregated Data**: Data that has been combined and summarized to show trends or totals without identifying individual records.
 - **De-identified Data**: Data that has been stripped of personal identifiers to prevent the identification of individuals.
 - **Public Data**: Information that is freely accessible without restriction.
 - **PII (Personally Identifiable Information)**: Any data that could potentially identify a specific individual, such as name, address, email, or phone number.
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In all cases, personal information shall only be distributed to authorized entities for the purposes of enhancing the mission and ministry of The United Methodist Church based on the following guidelines:

1. In the collection of data, GCFA is entrusted by the denomination to be a wise steward of the information it collects and keeps. This ministry carries tremendous responsibilities to ensure information is correct, current, complete, and that the privacy of individuals is protected. Data collection, storage, and distribution policies should reflect the denomination's current understanding of our shared connectional covenant. These policies should uphold the values of transparency and mutual accountability in balance with the need to protect the privacy of individual United Methodists.
2. All data storage and sharing policies shall conform with the Tennessee laws and governmental regulations pertaining to the collection, storage, and distribution of personal data-
3. Organizations and individuals in addition to their third parties shall handle the data in a way that:
 - a. restricts loading data to artificial intelligence (AI) and other software tools where the data becomes publicly searchable and/or is used to enhance AI models.
 - b. ensures adherence to the prevailing best practices for data security.
 - c. takes into consideration environmental sustainability.
4. All entities and individuals shall have the right to review their own information held by GCFA regarding the entity or individual. All requested revisions must be received from the authorized conference office designee.
5. Restrictions on data access shall be based upon five (5) data access categories, which are as follows:
 - a. Public - Data that can be readily accessed by anyone without restrictions or conditions. Data assets already publicly available do not require data sharing agreements (reference umdata.org) This includes the information necessary for conducting the business of the connectional Church and informing the public of its mission and ministries, such as:
 - i. Addresses for the offices of general agencies, bishops, annual conferences, and districts, as well as United Methodist-related schools, colleges, universities, hospitals, and homes will be available on an individual, entity-by-entity basis.
 - ii. Business addresses and other contact information for leaders of the denomination including bishops, general agency staff, conference staff, district superintendents, members of the boards of directors of the general agencies and the Connectional Table, and persons and entities not included in the above list will be available on an individual, entity-by-entity basis.
 - iii. The totals, trends, and analysis of statistics collected in Tables 1-3 for local churches as can be accessed on an individual, church-by-church basis.
 - iv. The mailing addresses and physical location of local churches which can be accessed one church at a time.
 - v. The totals, trends, and analysis of statistics collected on Tables 1-3, aggregated and shared in summary form only by relevant categories (e.g., gender, race, area).
 - vi. The appointments of the clergy, including the statistical trends of churches during their assignment to that appointment.

- vii. The public findings of research projects conducted by GCFA or General Agencies.
- b. Limited Access - Data that can be accessed by select individuals and entities with some conditions on their use. This information includes:
 - i. Consolidated files of addresses for the offices of general agencies, bishops, annual conferences, and districts, as well as United Methodist related schools, colleges, universities, hospitals, and homes.
 - ii. Consolidated files of business addresses and other contact information for leaders of the denomination including bishops, general agency staff, conference staff, district superintendents, members of the boards of directors of the general agencies and the Connectional Table, and persons and entities not included in the above list who are normally listed.
 - iii. Consolidated files of statistics of local churches, as collected on Membership and Participation (Table 1).
 - iv. De-identified datasets derived from original survey-based research, so long as the distribution of the data does not violate any previously established agreements or covenants made between GCFA and the respondents or data providers.
- c. Restricted - Data that can be accessed by a select group of individuals and entities for specific, limited purposes based upon a formal review and approval process by GCFA staff. This information includes:
 - i. Consolidated files of mailing addresses, e-mail addresses, and physical locations for local churches.
 - ii. De-identified consolidated datasets of clergy including basic demographics like, age and race. Data must be sufficiently cleansed to ensure information contained in the dataset cannot be used to identify individuals.
 - iii. Consolidated files of statistics of local churches, as collected on Membership and Participation (Table 1), Church Assets and Expenses (Table 2) and Church Income (Table 3).
- d. Highly Restricted - Data that can be accessed by a very select group of individuals and entities for specific, limited purposes based upon a formal review and approval process by GCFA staff. This information includes:
 - i. Individual contact information for clergy (including personal addresses, email, and business phone numbers) and lay leadership. This data may be used for the purposes of research and the communications by the Council of Bishops, general agencies, and the Connectional Table.
 - ii. Individual contact information for General Conference delegations. This data would be managed by The Commission on General Conference and its staff.
- e. Confidential - Data that cannot be distributed by GCFA to outside entities for any purpose.

- i. Data stored in GCFA databases on behalf of other entities for their internal use only. This includes data maintained in GCFA's database which is not included in the normal transmission of data between conferences and GCFA, and any additional data that GCFA has not formally requested from the conferences.
 - ii. Personal contact information used internally by GCFA staff for business purposes only, including home address, cell phone numbers, and other personal contact information, unless designated for business use.
6. Access to data shall be depended upon the relationship of the individual or entity to The United Methodist Church.
7. All parties requesting data not readily and freely available to the public shall make a formal, written request for data which shall include the specific purposes for which the data is to be used, the duration the data will be maintained and the procedure used for secure data destruction after the agreement ends. Upon review and approval of this request by GCFA staff, the requesting individual or entity shall agree in writing to abide by the data policies and practices of GCFA.
8. In instances where formal data sharing service agreements and contracts have been entered into by GCFA and other individuals and entities, GCFA staff may dispense with the formal process for reviewing and approving individual data requests.
9. No information shall be supplied to any entity or person if intended for use in connection with a special conference-wide or church-wide financial appeal unless the appeal has been approved in accordance with the provisions of ¶614.5, ¶613.2 or ¶819, respectively.
10. All data storage and sharing policies shall conform with the laws and government regulations pertaining to the collection, storage, and distribution of personal data, ensuring confidentiality and anonymity where required. No information shall be disseminated in a way that contravenes data security laws and regulations where the person or entity resides.
11. Information shall not be made available to commercial firms or other enterprises operated for profit for their own use. Unauthorized use, resale or further sharing is prohibited including publishing findings or reports using shared data. GCFA has the right to audit and review usage to ensure compliance with the agreement.
 - a. This provision shall not restrict the use of data by firms providing services to approved individuals or entities.
 - b. Those individuals and entities providing GCFA data to firms for approved purposes shall be responsible for ensuring the data is used in accordance with this policy and the provisions of any data sharing agreements established with GCFA.
 - c. Data can be shared for benefit of connection based on the ministry partners/sponsorship or third-party partnerships based on terms of individual agreements (e.g., GuideStar, Enterprise Rental Car discount program) ensuring no resale.
12. In limited instances of special circumstances, information may be distributed to entities or persons not regularly authorized upon express written approval by the General Secretary (or other elected GCFA

staff she or he designates) and the Chairperson of the Committee on Connectional Outreach. Actions taken will be reported to the Committee on Connectional Outreach.

13. The data provided by GCFA will be as accurate as possible at the time of dissemination, however there's no warranty on the timeliness and quality of the data.

Access Matrix

Constituent	Public	Limited Access	Restricted	Highly Restricted	Confidential
GCFA including board members	X	X	X	X	X
Bishops	X	X	X	X	
General Agencies	X	X	X	X	
Annual Conferences	X	X	X	X*	
United Methodist Schools, Colleges, Universities (per UMC senate)	X	X	X		
Districts	X	X	X		
Local Churches	X	X	X		
Other UMC affiliated organization	X	X	X		
Academic Researchers	X	X			
Non-United Methodist individuals or entities, for the purposes of research	X	X			
Individual United Methodists	X				
Non-United Methodist individuals or entities, for purposes other than research (e.g., marketing, solicitation)	X				
Other: Based on benefit to UMC	Based on discretion of GCFA Executive Team				

*Highly restricted data available to annual conference only for that annual conference.

Procedures

Based on the organization with which the constituent(s) is affiliated, they will be assigned to a category which will dictate their access to GCFA data. Constituent(s) with more than one affiliation, must specify the primary organization benefiting from the request.

If the primary affiliation is “Individual United Methodist”, the individual must provide a letter from their church indicating their active membership.

All data sharing requests must be submitted to the Executive Data Steward.

Constituents(s) will be asked to submit a Data Sharing Agreement (DSA) specifying the purpose, duration, and data destruction procedures.

Where data is shared on a ongoing basis, the DSA must be signed annually otherwise the DSA will be signed by the requestor for each request.

Data sharing with vendors or researchers can be governed by signed agreements, instead of a DSA, if it’s reviewed and approved by the GCFA Legal Department.

The Data Sharing Agreement (DSA) form will be periodically reviewed and approved by the Connectional Outreach Committee.

Annual Signoff for Ongoing Use - Agencies and affiliated entities with ongoing access to GCFA data must complete an annual signoff confirming:

- Continued need for access
- Compliance with GCFA data policies
- Any changes in data use or scope
- Updated contact and authorization information

The signoff must be executed by a duly authorized representative (e.g., General Secretary).

Individual Signoff for One-Time Requests - Individuals or entities requesting one-time access must:

- Submit a formal written request detailing purpose, duration, and data destruction procedures
- Sign a Data Sharing Agreement (DSA) or contract
- Confirm authorization to act on behalf of the requesting organization

GCFA reserves the right to deny requests that do not meet policy standards. GCFA can request to modify or terminate the agreement with written notice.

Recordkeeping and Review

All signoffs will be maintained by the GCFA’s Data Services Department and reviewed annually by the Executive Data Steward. GCFA may audit usage to ensure compliance.

The DSA process will have an appropriate level of transparency and coordination to ensure substantive policy, privacy, legal, business, technical, resource, security, and other operational concerns are identified and properly resolved. All DSA’s will be developed and negotiated by the Executive Data Steward for the program managing the data or by their delegated representative.

The leader of the Data Services Department shall be responsible for implementing and overseeing this policy.

Additional Notes

- GCFA complies with applicable data protection laws (e.g., GDPR, CCPA).
- Unauthorized use, resale, or further sharing is prohibited.
- GCFA reserves the right to audit data usage.
- Clarification on liability, indemnification, and jurisdiction will be included in all agreements.

Originating Committee

Connectional Outreach

POLICY COMPARISONS

Original vs. Revised GCFA Denominational Data Sharing Policy

Category	Original Policy	Revised Policy
Structure	Mixed formatting, embedded comments, less organized sections	Clear headings, structured layout, and logical flow
Definitions	No formal definitions section	Added section defining key terms (e.g., Entity, Third Party, PII)
Third-Party Data Use	Minimal guidance	Explicitly addressed with policy language and examples, including restrictions on marketing and resale
Authorization & Signoff	No formal signoff process described	New section requiring quadrennial signoff for agencies and one-time signoff for individual requests
Data Access Categories	Described in narrative form	Presented in both narrative and tabular format for clarity
Data Access Table	Embedded in document with inconsistent formatting	Clearly formatted table showing access levels by constituent type
Procedures	Mentioned but lacked detail	Expanded to include opt-out process, agreement drafting, and review steps
Legal Compliance	Mentioned compliance with laws, but lacked specificity	Creates a stricter standard to address privacy laws and regulations
Audit & Review	Briefly mentioned	Detailed process for recordkeeping, annual review, and audit rights
Liability & Indemnification	Referenced in comments only	Included in Additional Notes with commitment to include in agreements
Responsibility	Assigned to Director of Data Services	Expanded to include Connectional Outreach Committee's review role
Comment Integration	Comments were present but not incorporated	Feedback from comments fully integrated into revised content

This comparison highlights the evolution of the policy from a draft with embedded feedback to a finalized, structured document that reflects best practices in data governance and denominational accountability.