Iowa’s State longitudinal data systeM

Protocol for Requesting Record-Level SLDS Data: External Requests

This document describes the steps involved in requesting and using record-level data from Iowa’s State Longitudinal Data System for external requestors. External requestors include members of the SLDS Project Team that are not from a data-contributing agency, non-voting members of the Steering Committee, as well as anyone that is not a part of the SLDS team. This form serves as a companion to the Record-Level Data Request Application.

Some complex or time-consuming data requests may incur a fee to cover SLDS staff time. The Steering Committee will notify data requestors of any applicable fees for fulfilling the data request upon reviewing the formal data request.

**Requesting the use of Record-Level SLDS data.**

**STEP 1**.  **Complete the Data Request Application.**

1. **Project title.**

The name of the project for which SLDS data will be requested.

1. **Date of data request.**

The date the Data Request Application is submitted.

1. **Anticipated start date for this project**

Date by which you need the SLDS data.

1. **Proposed end date for the project**

Date by which data will be destroyed.

1. **SLDS partners from which merged data are required***.*

A minimum of two SLDS partners are required for an SLDS data request. For requests involving only one SLDS partner, inquiries regarding data should be made directly to the data-owning agency.

1. **Project Coordinator contact information**

Contact information for the project’s main contact.

1. **Key Personnel.**

Name, duties, and date of Human Subjects Training for all personnel who will have access to the SLDS data, including the Project Coordinator.

1. **Purpose of data request.**

[ ] Research, requiring record-level data

[ ] Program evaluation, requiring record-level data

Based on the below definitions, requestors must determine whether their project is considered research or program evaluation.

**Research**

“A systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge. Activities that meet this definition constitute research for purposes of this policy, whether or not they are conducted or supported under a program that is considered research for other purposes. For example, some demonstration and service programs may include research activities.”[[1]](#footnote-1)

**Program evaluation**

“Program evaluation is the application of systematic methods to address questions about program operations and results. It may include ongoing monitoring of a program as well as one-shot studies of program processes or program impact. The approaches used are based on social science research methodologies and professional standards.”[[2]](#footnote-2)

1. **Is IRB approval required?**

Based on the combination of responses to questions 8 and 9, requestors must then determine whether Institutional Review Board (IRB) approval is required using the below criteria. If IRB approval is required, requestors must submit documentation of IRB application and/or approval along with the Data Request Application.

**Research projects that require record-level data**

If a project is considered research and requires record-level data, then the project must be reviewed and approved by the researcher’s federally approved Institutional Review Board (IRB) to ensure that safeguards for human subjects are in place before the researcher makes the SLDS data request. Researchers who work for an organization without a federally approved IRB may not request record-level data from the SLDS.

**Program evaluation projects that require record-level data**

For program evaluation projects, record-level data can be provided to those individuals who have a “legitimate educational interest” in the data as defined by FERPA[[3]](#footnote-3) and determined by the Project Team or Steering Committee without IRB approval. If the project does not meet the “legitimate educational interest” threshold, however, then the project would be considered research and would require IRB approval.

1. **What are the objectives of this project?**

Briefly explain, in language understandable to a layperson, the specific goals or anticipated outcomes of this project.

1. **Who will benefit from this project?**

Explain who will benefit from the information being requested**.**

1. **What other work/experience/research has already been done on this topic and is providing a framework or guide for this study *(i.e., theoretical framework)*?**

Please provide appropriate citations of any published work referenced.

1. **What questions are you trying to answer with these data *(i.e., research questions and hypotheses)*?**

List the questions/assumptions/hypotheses that will be tested using the requested data.

1. **Data Sample/Population**

Please be very specific about the group of people for which you are requesting data. This will help us understand your data request and allow us to suggest alternative data elements if the ones you are requesting are not available. For example, your project might plan to study postsecondary math placement of female high school students who took a high school calculus class between the years of 2013 and 2019.

1. **List of Variables Needed for the Research**

Please provide a detailed list of the variables you anticipate needing for this project (you may attach a separate document to this application if needed). We understand that you may not be aware of all the available variables, but please give us your best approximation.

1. **Data Analysis/Statistical Methodology**

Briefly describe the statistical analyses planned for this project (e.g., frequencies, crosstabs, regression). Projects that intend to make causal inferences from the data (A causes B) will be given much greater consideration if employing causal inference methodologies recommended by the American Educational Research Association (AERA), National Science Foundation (NSF), and the National Center for Educational Statistics (NCES). These methodologies include fixed effects models, instrumental variables, propensity scores, and regression discontinuity.

1. **Data security plan**

In order to protect released record-level SLDS data, we require that individuals and groups requesting data maintain the following minimum data security measures. As covered in the Key Personnel section of this application, only key personnel are allowed access and use of the SLDS data.

Project Coordinator: initial by each of these items to signify agreement with the terms.

\_\_\_\_\_ Strong passwords and multi-factor authentication are used to restrict access to devices on which data are stored.

\_\_\_\_\_ Devices on which data are stored will automatically shut down, logout, or lock (e.g., password-protected screen saver) after 10 minutes of inactivity.

\_\_\_\_\_ Current and regularly updated anti-virus/malware software is installed on devices with access to data.

\_\_\_\_\_ Internet firewalls are turned on for devices on which data are stored.

\_\_\_\_\_ Any paper copies of record level data are secured in a locked filing cabinet.

\_\_\_\_\_ All devices on which the data are stored (e.g., laptops, tablets, flash drives, smartphones) are encrypted or stored within encrypted file folders on those devices.

\_\_\_\_\_ The physical protection of portable devices containing encrypted data is the responsibility of all key personnel.

\_\_\_\_\_ Lost or stolen devices that contain data will be reported to the SLDS team immediately.

\_\_\_\_\_ Data requestors and/or their organization have policies in place to oversee compliance, inventory, and auditing of external devices.

\_\_\_\_\_ Cloud-hosted environments that will be used to store data are [FedRAMP](https://www.fedramp.gov/) and/or [StateRAMP](https://stateramp.org/) authorized.

\_\_\_\_\_ Destruction of electronic data will be done by overwriting the stored data. Overwriting replaces new data in storage locations, making the previous data unreadable.

1. **Where will the data be stored?**

Describe the where the data will be stored, such as on a shared laptop, a laptop with a single user, cloud storage, etc.

1. **Dissemination and Outreach**

Briefly describe how the results of this project will be shared with the general public. All publications must cite the Iowa SLDS as the source of the data used.

**STEP 2.**  **If IRB approval is required, prepare IRB application.**

**STEP 3. Determine whether the data for the research or program evaluation project are already covered by an existing** **Memorandum of Understanding (MOU).**

FERPA requires the use of MOUs to codify data sharing agreements between agencies. MOUs already exist between the agencies that share data to the SLDS and the agency that houses the SLDS (IDOE). If researchers/evaluators are requesting data beyond what is included in the SLDS or requesting to use the data in ways not allowed by current MOUs, then a new MOU will be required.

**STEP 4. Submit the Data Request Application and documentation of IRB application or approval to the SLDS Project Team.**

The SLDS Project Team oversees the day-to-day operations of the planning, design, production, and implementation of Iowa’s SLDS. The SLDS Project Team will review the application and advance the application to the SLDS Steering Committee for approval. Final approval of any application is contingent upon IRB approval.

**STEP 5. Create necessary MOUs.**

Once the Data Request is approved and IRB approval is in place, the next step is to establish a new MOU (if the data exchange is not covered by an existing MOU).

**STEP 6. Pull the data.**

Once an application has been approved by the appropriate SLDS team, IRB has approved, and all necessary MOUs have been signed to codify the data sharing relationship, an SLDS team member will pull and deliver the required dataset.

**STEP 7. Analyze the data and protect student privacy.**

Before findings may be submitted to the SLDS Steering Committee for review and approval – the final step before data release – all tables and figures must be redacted according to the SLDS suppression rules. They are:

1. Suppress cell if numerator or denominator is five or less.
2. If the sum of individuals across all suppressed subgroups is five or less, suppress the smallest and next smallest subgroups to ensure the number of suppressed individuals is six or greater.

**STEP 8. Submit findings for review and approval.**

Requestors must submit all reports, tables, graphs, and figures to the SLDS Steering Committee for review and approval prior to publication. This review will focus on errors in analysis or methodology, disclosure risk concerns, and compliance with suppression rules. This review is not intended to include editing suggestions (except to correct errors) or feedback on substantive content or conclusions.

**STEP 9. Destroy the data.**

Upon completion of the project or the project’s termination date as per the Data Request Application and/or the MOU, whichever is sooner, the data must be destroyed by the requestor. Once the data are destroyed, the project coordinator must complete and sign a confirmation of data destruction agreement.

1. [45 C.F.R. § 46.102](https://www.hhs.gov/ohrp/regulations-and-policy/regulations/45-cfr-46/revised-common-rule-regulatory-text/index.html#46.102) [↑](#footnote-ref-1)
2. Newcomer, K. E., Hatry, H. P., & Wholey, J. S. (2015). *Handbook of practical program evaluation*. John Wiley & Sons: p. 8. [↑](#footnote-ref-2)
3. For more on FERPA, see the U.S. Department of Education’s Privacy Technical Assistance Center’s homepage: <https://studentprivacy.ed.gov/>. [↑](#footnote-ref-3)