



[RESEARCH REQUEST, DATA USE, AND CONFIDENTIALITY INFORMATION]

Information for submitting an application to obtain data from the Green Bay Area Public School District. Terms for the use, security, and confidentiality of data for educational research or data analysis. Forms for application submission and approval. (Revised December 2022)

Green Bay Area Public School District Research Request Information

Dear Researcher,

Thank you for your interest to conduct research in the Green Bay Area Public School District. This document is designed to provide information to support the research request you will submit to the District using the *Research Request Application*. Your research request will be reviewed by District Leadership of the department(s) that align with your research question, strategy, sample, and location. Please allow at least three weeks for review of your request.

Upon completion of the review and approval of the request, a letter in support of your research will be generated. At the completion of the review process all necessary approval signatures for you to conduct the research will be in place. No other letter from the District should be necessary for you to conduct the approved research request, other than the letter sent to you via e-mail from the Deputy Superintendent. This is the letter that you will submit to your university institutional review board (IRB).

Part 1: Overview of Review Process

Green Bay Area Public School District policies and procedures for access to data District Policy 893, “Relations with Educational Researchers” states:

The Green Bay Area Public School District recognizes that both school and community can benefit from the results of properly designed and conducted research; therefore, the District provides external parties and its employees opportunities to conduct research, administer surveys, and evaluate programs.

I. Receiving Researcher and Institutions must:

- Have a demonstrated record of using sensitive data according to commonly accepted standards of research ethics and FERPA; and
- Be an institution of higher education or a research organization (nonprofit), or a government agency located within the United States; and
- Have an established Institutional Review Board/Human Subjects Review Committee or equivalent institution-level body to review research proposals using sensitive data.

II. Requirement of Principal Investigators (Researchers) and receiving institutions

In accordance with FERPA, the data (or in the case of surveys, interviews, and focus groups) are released only after parental permission for the release of the data is received and given to the District. Data is released only for research use. Data released without parental permission meets the definition and the condition of release of Directory Data or is released in the condition of a limited dataset that the data is random, unidentifiable, and uncoded. Researchers must have their primary affiliation with an institution that meets the criteria outlined above in order to be considered eligible to receive Green Bay Area Public School District data.

III. Requirements of District Employee, Student Teachers, and Interns.

District employees and student teachers may request permission to conduct research (and use of datasets) for course assignments and/or degree fulfillment. If the research or data collection requires direct contact with either staff or students, the researcher(s):

- a. must provide documentation of a satisfactory background check (for each person with access to students). The student (if not a District employee) is required to bear any and all costs associated with obtaining a background check.
- b. must explain the steps that will be taken for the research to be conducted objectively and without bias, particularly if the researcher is also the classroom teacher.
- c. attend an in-person research panel review to present the proposal for research conducted during the school day.
- d. must provide evidence of full IRB Committee review of the research. To align with the Code of Federal Regulations full committee review is necessary. A statement stating the research is exempt from full committee review is not acceptable.
- e. must submit a formal request to conduct research using the *Research Request Application*.

Approval to conduct research and letters of support are provided by the Superintendent's Office. School principals should not be expected to provide letters of support.

III. If permission to conduct research is denied

If an external party or a District employee's request to conduct research is denied, a written appeal may be filed with the Deputy Superintendent. The Deputy Superintendent will forward the appeal to the Superintendent, and for employees the Executive Director of Human Resources for a final review and determination of the research request.

If a District employee's request to conduct research in their building of assignment is denied, a written appeal may be filed with the next higher level of authority for a final determination.

Part 2: Information to support submitting a *Research Request Application*

Formal Request to Conduct Research or Use Data for Course Assignments

Requests, submitted by external parties, District employees, student teachers, and interns to conduct research, surveys, program evaluations, and/or for the use of datasets will be reviewed using the guidelines listed below. External parties are non-District employees that include, but are not limited to, graduate students, university faculty, not for profit organizations, and research organizations.

Complete all sections of the *Research Request Application*; if a section is not applicable to your research study indicate that in your submission, along with an explanation. Submit the completed request documentation to the Deputy Superintendent. Organize the document by the headings listed on the *Research Request Application* document.

Research Request Application: Description of Research/Program/Project: Provide a written description of the research/program/project and include the following:

- Title of study
- Purpose statement of the study
 - Research question(s) or Hypotheses (If hypothesis testing provide inferential stats)
- Research plan/study design
- Data collection procedures
- Study timeline (including important program due dates)
- Benefit and implication to Green Bay Area Public School District (Explain how this study aligns with the Green Bay Area Public School mission and vision, priorities and the implication to staff time, resources, etc.)
 - Expectations of participants (amount of time necessary from participants, etc.)
- Plan for reporting results
- All associated documents in support of the research design
- Participant consent forms
- Copies of all surveys, interview and/or focus group questions
- Observational protocol/data collection forms
- Other
- Proof-read and presented in final draft form

Please allow 4-6 weeks for the review and approval process to be conducted. Once received, the application will be reviewed by the District Administration. Documentation in accordance with the approval will be completed prior to research being initiated.

• **Study Timeline: Schedule** including but not limited to the following information:

- a. District research review
- b. IRB approval
- c. Data collection
- d. Data analysis
 - i. Describe how the data supports the study aims
 - ii. Explain why the data elements are necessary
 - iii. Explain the duration of the need of the data
 - iv. Identify the number of times the data will be requested and frequency
- e. Course, grant, research completion date
- f. Destruction of the data

• **Benefit to the District:** Include a rationale to explain how the District will benefit from the study.

- a. The District reserves the right to deny any research request that is not reasonably free of risk, discomfort, or expense to the District, or does not provide any direct benefit.
 - a. Research activities involving students may not be conducted June 1 through September 1, unless the District initiates the research. Exceptions may be considered on a case-by-case basis.
 - b. Submit a logic model that clearly outlines the inputs, outcomes, outputs, short-term and long-term strategies, resources, etc.
 - c. The District reserves the right to charge a fee to cover the cost of creating data sets for the study. Any costs will be standard and customary; will be agreed upon by both parties, and stated in the final signed agreement.
 - d. The District reserves the right to deny any research activity that does not justify the expenditure of District time and resources.

• **Participant Expectations**

- a. **Classroom Instructional Time Impact:** Explain the project impact on the classroom instructional time.
- b. Provide details on the role and time requirements of the teacher, student, or other District personnel (research participant or data access).
 - i. The District reserves the right to deny any research request that substantially alters the District's adopted curriculum.
- c. Include electronic copies of all documents to be used in conjunction with the research. All documents to be used with the research will be reviewed by the District, even when prior-IRB approval has been obtained. Allow at least 2 to 4 weeks for review of submitted documentation.
 - i. surveys
 - ii. interview questions
 - iii. focus group questions
 - iv. course or program content
 - v. assessments, tests, rubrics, evaluations
 - vi. other data collection forms, spreadsheets, etc.

• **Documentation**

- a. IRB Approval: Upon approval of the research, a copy of the final IRB approval will be required.

Human Subject Protection, Risk, Harm, and Voluntariness:

 - i. Does the research involve the use of human subjects?
 - ii. If the research involves human subjects, how will the rights and welfare of the human subjects (students, educators, administrators, parents, etc.) be protected? Please include when appropriate information for compliance to FERPA, PPRA, and the National School Lunch Act regulations.
 - iii. Institutional Review Board (IRB) approval is required. Include copies of the documentation you will submit to the university IRB submission. If the researcher is conducting the study in their own classroom full IRB Committee review of the research will be necessary.
 - iv. For individuals, not associated with an IRB or an institution with a review process, submit a copy of certificate of completion of *Human Subject Protection* training for the Researcher and study/team members that may have access to the data.
 - v. Explicitly explain the following:
 1. Participation by District personnel and students
 - a. If the research is taking place as part of the classroom instruction, participation is not voluntary, unless the student can decline participating and not experience an impact to learning, curriculum, or

- b. Students under the age of 18 cannot participate in research without the consent of the parent.
 - c. Explain the steps that will be completed to receive authorization from the parents to access student information.
 - d. This information must be communicated in the parent permission form, as well approval obtained from the District Superintendent of Schools, or an Associate Superintendent.
- 2. that access to educational programming and curriculum will not be disrupted;
- 3. the degree of harm,
 - 4. the risk to the student through participation in the research,
- 5. the right to withdraw consent at any time (this includes permission to pupil records) - without fear of prejudice.
- 6. use of psychiatric or psychological examination or treatment. This information must be communicated in the parent permission form, as well as approval obtained from the District Superintendent of Schools, or an Associate Superintendent.
- 7. procedures for anonymity, de-identification, etc. (student, parent, school, district)
 - a. If identification is necessary, the researcher will submit a proposal for a data use review.
- vi. Does the research involve the use of a control group, peer or group comparison?
 - 1. Please note: Students in a control group will not be denied any aspect of the District's educational program.
 - 2. If a peer or comparison group is part of the study design, permission for access to data and/or participation in the study will need to be obtained for peer or comparison groups.
- vii. Will participants receive remuneration or an appreciation gift for participation?
 - 1. Arrangements must be made by the Researcher to have gift cards, gifts in kind, or a form of payment that is the equivalent of cash, managed through the Green Bay Area Public Schools Finance Office. The payment will be added to the payroll check and have the appropriate tax removed from the amount.
 - 2. An alternative is for the Researcher to make a donation to the school(s) that the participants are members of the staff.
 - 3. Green Bay Area Public Schools does not support specific brands or businesses, donations must be in the form that the application of the funds is at the discretion of the District or the school.
 - 4. It is the responsibility of the Researcher to notify the participants of the arrangements of remuneration.
 - 5. If the Researcher does not comply with the information previously listed, the participant must be notified through the study information of the requirement to turn in the remuneration to the District.
- viii. Explain the data de-identification, storage and security processes.

b. Parent Permission and Informed Consent Form

- i. Will the informed consent and assent be obtained from the participants?
 1. If yes, describe the process and include copies of the informed consent forms
 2. If no, explain why informed consent and assent will not be obtained.
- ii. Will parent permission be necessary?
 1. If yes, provide a copy of the parent permission form (translated when necessary).
 2. If no, explain why parent permission is not necessary.
- iii. Will the research involve direct contact with students?
 1. If yes, provide a copy of the parent permission/notification form describing the student contact.
- iv. Will student data be used in the research, including, but not limited to: data collection results (surveys, tests, focus groups, etc.), demographic information, socio-economic information, state achievement tests, formative assessments, behavior, attendance, immunization, journals, homework, etc.
 1. If yes, provide a copy of the parent authorization form that allows for the data collection and use for research (and class assignment) purposes.
 2. Employees of the Green Bay Area Public School District are required to obtain parent authorization for the use of data for non-classroom use.
- v. District approval of forms is necessary, even with IRB approval of the forms and process
- vi. If student data is to be, a Parent Authorization Form must be on file for each student, in their cumulative file, specific to each research event.
- vii. Data Use Agreement: Upon approval of the research, a signed data use agreement will be required.
- viii. Confidentiality Agreement: Upon approval of the research, a signed confidentiality agreement will be required.

Part 3: Data Use Requirements and Restrictions

The data provided under this agreement shall be held by the Researcher, research staff, and receiving institution in strictest confidence and can only be disclosed in compliance with the terms of the signed agreement. For use of GBAPS data files, the Researcher, research staff, and receiving institution agree:

- i. That the data will be used solely for statistical analyses and that no attempt will be made to identify and/or contact specific individuals, families, households, schools, or institutions, nor will any listing of data at the individual, family, or school level be published or otherwise distribute data to another party, or to use the data for any other purpose beyond the stated purpose in this agreement.
- ii. That the data will be used solely for statistical analyses and if the identity of specific individuals, families, households, schools, or institutions, is known, it was obtained through a signed parent permission informed consent form that clearly stated the type of information to be collected and how it would be stored, secured, used, etc.
 - o The parent permission obtained is for access to the data. The permission does not in any way allow the investigator or any member of the study team to contact the specific individuals, to list the private and confidential data of the individual, family, or school level in any form or to be published or otherwise distribute the data to another party, or to use the data for any other purpose beyond the stated purpose in this agreement. If data will be supplied to funders this must be explicitly stated along with the funding source.
- iii. That, if the identity of any student should be discovered inadvertently from a de-identified, anonymous data set, then (1) no use will be made of this information, nor will it be shared with anyone else; (2) the identifying information will be safeguarded or destroyed.
- iv. To avoid inadvertent disclosure of student identities by taking the following precautions in the release of statistics derived from the data set:
 - a. All computers that use or hold the data sets have data encryption capability.
 - b. In no table should a single cell contain all cases in any row or column.
 - c. In no case should the total figure for row or column of a cross-tabulation be fewer than three.
 - d. In no case should a quantity figure be based upon fewer than three cases.
 - e. In no case should a quantity figure be published if one case contributes more than fifty percent of the amount.
 - f. In no case should data on an identifiable case, or any of the kinds of data listed above, be derivable through calculation from the combination of tables released.
 - g. Data released should never permit disclosure when used in combination with other known data.
- v. GBAPS will not release socio-economic data, ethnicity, or race information on the student population for an individual or in aggregate form, identified, or de-identified.
- vi. GBAPS will release only a limited, de-identified, decoded dataset for a research study to address the research question. Only when required by Federal or State directive is a dataset of all students enrolled in a course, class, grade, building, or the District provided.
 - a. GBAPS considers achievement test data as behavioral data. Parent permission is necessary to release information in an identifiable format for students in a treatment or control group of a study.
- vii. GBAPS considers achievement test data as behavioral data. Parent permission is necessary to release information in an identifiable format for students in a treatment or control group of a study.
- viii. GBAPS requests Researchers to first consult public domain, Wisconsin Department of Public Instruction information sites for data sets to accomplish study aims, prior to requesting data from District resources.
- ix. That only the persons identified in the data agreement as Researcher or research staff will have access to the contents of the data files, including derived data files.

- xi. To comply with District procedure in regard to data for programs when students participate in the program less than 1 complete academic year.
- xii. To comply with the District procedure to not provide data beyond 2 years past student participation in the program for follow-up data tracking. (resulting in no data use or sharing agreement going beyond 3 academic years).
- xiii. To supply GBAPS with Confidentiality Agreements, with original signatures, for the Researcher and all research staff identified for the study.
- xiv. To respond promptly and in writing to inquiries from GBAPS regarding compliance with this agreement or the expected date of completion of the research.
- xv. To destroy all electronic and paper files at a date specified within the data use agreement. This date will likely depend, in part, upon the complexity of the project, the professional societies and journals to which the data will be reported, and the data retention policy of the institution with which the investigator is associated. Follow-up with GBAPS with notice of data destruction is required.
- xvi. To use data for the research study objectives and aims outlined in this agreement. Expansion of the study objectives and aims in subsequent years will require the Researcher to complete and submit a separate data use agreement.
- xvii. To provide manuscripts to GBAPS and the School Board for review prior to publication to ensure confidentiality, privacy, accuracy, including but not limited to text, titles, captions, images, tables, charts.
- xviii. To provide documents prepared for presentations to GBAPS and the School Board at least three weeks prior to presentation for review and approval to ensure confidentiality, privacy, accuracy, including but not limited to text, titles, captions, images, tables, charts.
- xix. To provide annual reports to the GBAPS, which include:
 - a. A copy of the annual IRB approval for the project;
 - b. A listing of public presentations at professional meetings using results based on the data; and c.
 - Copies of papers accepted for publication using these data, with complete citations.

In the event that the Researcher changes institutional affiliation during the period covered by this contract, the Researcher will take the following actions: inform GBAPS prior to relocation, resubmit a data security plan and obtain signed IRB approval from the new institution, and provide assurance that all data files are removed from the original site.

Part 4: Forms to be completed with research request**Green Bay Area Public School District****DISCLOSURE AND DATA DESTRUCTION**

Researchers using student-level and/or teacher-level information will be required to present a copy of each manuscript and presentation materials to GBAPS prior to publication for approval and review in order to ensure that confidential information is not improperly disclosed, this includes, but is not limited to the name of the school district, name of the school, name of the teacher, name of the student, any information presented that could inadvertently identify any of the aforementioned information. This is not intended as editorial control by GBAPS. All potential submissions should be sent to the Deputy Superintendent's Office at the Green Bay Area Public School District, in order to be distributed to the appropriate persons at GBAPS for review and approval, at least two months in advance of publication and three weeks prior to a presentation.

Please provide approximate date of first submission or presentation:

Please note, graduate students using data for course or degree completion will enter the date the document is submitted to their instructor or committee. Upon completion of the course or degree a copy is submitted to the District office to be placed on file.

The Family Educational Rights and Privacy Acts Statute (FERPA) describe circumstances under which Local Educational Agencies (LEAs) and GBAPSD are authorized to release confidential data regarding individual students, teachers, and schools without prior parental consent. Confidential information can be disclosed "to organizations conducting studies to develop, validate, or administer predictive tests, to administer student aid programs, or to improve instruction, and the information is released to no one other than the organization and is destroyed when no longer needed".

Does this research meet the terms above for release of confidential data? Does this research require the use of confidential data?

Does the researcher have parent permission for release of confidential data, identifiable or otherwise?

Data to be destroyed on or before:

Signature: _____

Date: _____

The Green Bay Area Public School District requires all data be stored in secure and encrypted environments. Data should not be stored on individual computer work stations or mobile devices. Data released for analysis to study team members will have computer workstations that have the software capability to encrypt the data.

Signature: _____

Date: _____

The Researcher or delegate responsible for data analysis has reviewed the Wisconsin Department of Public Instruction website to verify that the data to meet study objectives is not already available in a public domain setting. Yes or No

Signature: _____

Date: _____

Green Bay Area Public School District

Confidentiality

(This form is required for each person on the project or study, any person that will be in contact with the data.)

I have received approval to conduct research with data from confidential pupil records obtained from the Green Bay Area Public School District. I am aware of restrictions to use of such data specified by the Family Education Rights and Privacy Act (FERPA), enacted by the United States Congress.

I agree to fulfill my responsibilities on this research in accordance with the procedures and requirements established in the submitted Data Use Agreement and Data Security Plan. I agree to the terms and conditions of the Green Bay Area Public School District for the use of the data, access, publication, and disclosure.

I agree to contact the District in the event the details of this agreement are breached and understand the approval to conduct research or to access data will be discontinued. I agree that if I fail to abide by the procedures established in this agreement (Data Use and Confidentiality Agreement and the Data Security Plan) I will cease using the data and will destroy all files containing the data that were created for the study or obtained from the Green Bay Area Public School District.

Name: _____

Research or study role: _____

Printed Name: _____

Signature: _____

Date: _____

Part 5: Definitions

Research

A systematic process to collect data to answer a question.

Data Collection Instrument or Procedure

Through the use of an instrument and/or procedure data (qualitative or quantitative) is collected to answer the research question. The instrument and/or procedure should demonstrate validity, reliability/trustworthiness. Examples of data collection instruments and procedures are: surveys, pre/post-tests, focus questions, interviews, questionnaires, assessments (formative, summative, state achievement), content analysis, and environmental analysis.

Green Bay Area Public School District

May be represented by GBAPS or “the District”

Researcher

Person submitting the application or the data request. The Researcher is the person responsible for obtaining the Institutional Review Board (IRB) approval (academic setting), or other board/committee approvals (non-academic settings). The researcher is also commonly referred to as the Principal Investigator or Investigator.

Data

Information (numbers, text, verbal conversations, and datasets) obtained from the Green Bay Area Public School District for educational research, or in support of for funding for reporting purposes. See District Policy 347 and associated Rules for information on access to student data.

FERPA and PPRA

“The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.” Obtained from the United States Department of Education, <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

The District also adheres to the Protecting Pupil Rights Amendment. The Protection of Pupil Rights Amendment (PPRA) (20 U.S.C. § 1232h; 34 CFR Part 98) applies to programs that receive funding from the U.S. Department of Education (ED). PPRA is intended to protect the rights of parents and students in two ways: for more information: <http://www2.ed.gov/policy/gen/guid/fpco/ppra/index.html>

Pupil Records

“All records directly related to a student and maintained by the school district are pupil records. Pupil records include records maintained in any way including, but not limited to, computer storage media, video and audio tape, film, microfilm, and microfiche. Records maintained for personal use by a teacher and others required to hold a license under Wis. Stat. sec. 115.28(7) are not pupil records, if the records are not available to others. In addition, records necessary for and available only to persons involved in the psychological treatment of a child are not pupil records. Finally, law enforcement unit records are also not defined as pupil records, Wis. Stat. sec. 118.125(1)(d).” Obtained from the Wisconsin Department of Public Instruction, <http://sspw.dpi.wi.gov/files/sspw/pdf/srconfid.pdf>

Types of Pupil Records

- Directory Data – as defined by District Policy 347
- Progress Records
- Behavioral Data
- Pupil Physical Health Records
- Patient Health Care Records

Access and Disclosure

Under the Family Educational Rights and Privacy Act (FERPA), disclosure means to permit access to or the release, transfer, or other communications of personally identifiable information contained in education records to any party, by any means, including oral, written, or electronic means, [34 CFR 99.3](#). Obtained from the Wisconsin Department of Public Instruction, <http://sspw.dpi.wi.gov/files/sspw/pdf/srconfid.pdf>

Acknowledgement

Sources consulted for development of this document:

Green Bay Area Public School District Policy, Department of Education, Department of Health and Human Services, Data Use Agreements North Carolina Education Data Research Center, Data Use and Confidentiality Agreements, University of Wisconsin-Madison, Education Research, United States Department of Education Wisconsin Department of Public Instruction