



COLORADO
Department of Education

Research Requests Process

**Approved by the State Board of Education
at the September Meeting**

September 14, 2016

Agenda

- Legislative Requirement
- Roles and Responsibilities
- Research Approval Panel (RAP)
- Primary Evaluation Requirements
- Secondary Evaluation Questions
- Proposed Researcher Request Process

Legislative Requirement

- The Student Data Transparency and Security Act (22-16-101 et. al., C.R.S.) states:
 - The Department shall develop a process to consider and review all outside requests for Student Personally Identifiable Information, other than aggregate student information already publicly available, by individuals not employed by the state who seek to conduct research using school system data or Student Personally Identifiable Information already collected by the department.
 - The Department shall implement the process subject to approval by the State Board.*

* The State Board of Education approved this process as amended on September 14, 2016.

Roles and Responsibilities

State Board	<ul style="list-style-type: none">• Approves the review process• Approves individual research requests
Requestor	<ul style="list-style-type: none">• Submits all required information• Reviews/negotiates the Data Sharing Agreement with privacy/security requirements• Acts as Point of Contact for Researcher
Research Approval Panel	<ul style="list-style-type: none">• Considers the research for validity, privacy issues, alignment with CDE priorities, resource availability, etc.
CDE Program Representative	<ul style="list-style-type: none">• Participates in the Research Approval Panel• Provides the secure data to the researcher if approved
Data Privacy Team	<ul style="list-style-type: none">• Drafts/negotiates a Data Sharing Agreement (DSA)• Confirms destruction of data at end of research
Commissioner	<ul style="list-style-type: none">• Approves individual research requests if appropriate

Research Approval Panel

- The Research Approval Panel will function as CDE's primary body for evaluating research requests.
- The RAP will include CDE members from the following areas:
 - Program Experts (familiar with legal requirements for their programs)
 - Policy Analyst (familiar with CDE regulations, laws and policies)
 - Research Experts (familiar with research methods and practices)
 - Data Owners (responsible for overseeing specific information)
 - Data Privacy
 - Data Security
 - Other employees as needed, e.g., database administrators
 - Outside parties (e.g. parents, community members) as needed and appropriate.
- The RAP will determine if the research complies with the primary evaluation requirements and work together to determine the answers to the secondary evaluation questions.

Primary Evaluation Requirements

If the answers to any of the following questions are NO, the research is not approved and the evaluation process stops.

Does the research comply with CDE policy?

Does the research comply with all laws?

Does CDE have the resources to provide the data?

Does CDE have the data being requested?

Does the researcher have IRB approval?

Secondary Evaluation Questions

The following questions may be subjective but require careful consideration and discussion within the Research Approval Panel.

Does the research have benefit to Colorado education?

- Does the research cover areas that need to be explored?
- Does the research benefit vulnerable populations?
- Does this research support any CDE projects?
- Does the research assist CDE with complying with legal obligations?

Is the research valid and legitimate?

- Does the methodology allow for the continued protection of the privacy of students?
- Is the research methodology in line with standard practices?
- Are there any flaws or gaps in the planned research or methodology?
- Is the research counter to the interests of Colorado students and parents?

Secondary Evaluation Questions

The following questions may be subjective but require careful consideration and discussion within the Research Approval Panel.

Should the data be limited or redacted?

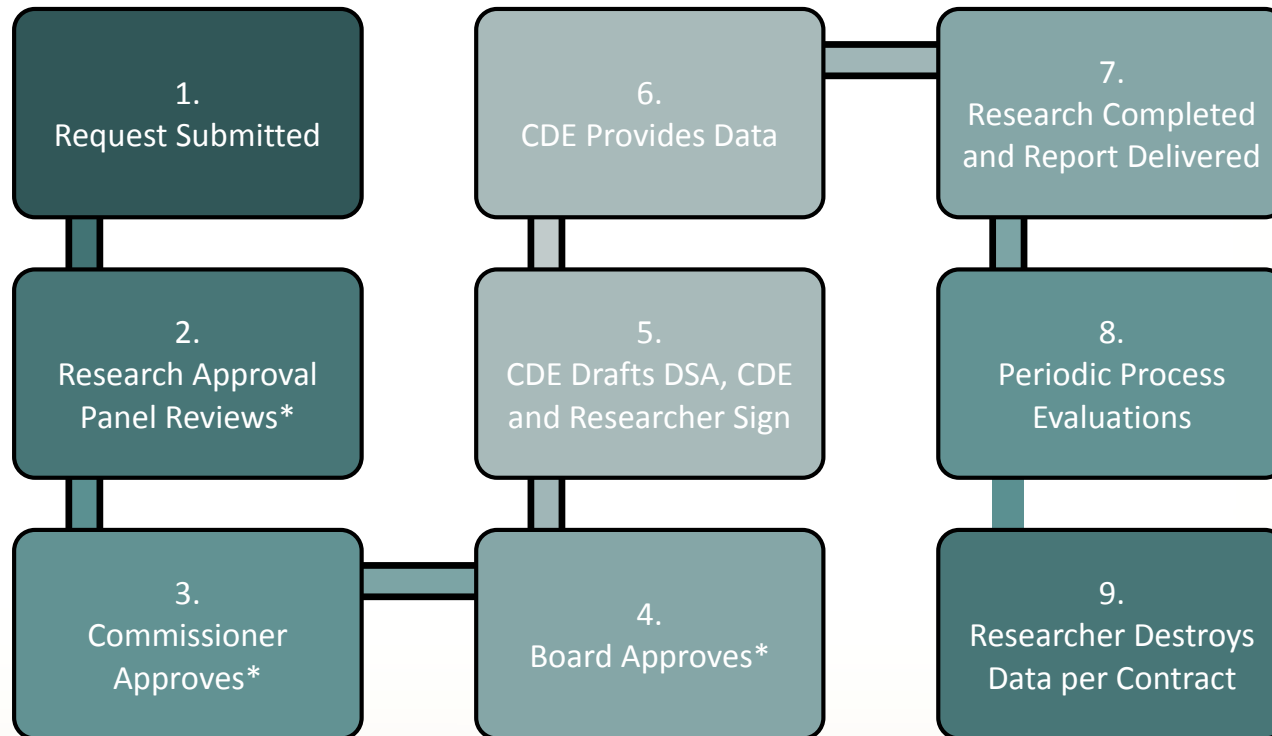
- Does the data requested threaten the privacy of students?
- Is the data reliable or sufficient to be statistically valid?
- Are there alternatives to providing PII?

Is the research of a sensitive nature?

- Are any of the data elements provided particularly sensitive?
- Does the research have the potential to cause harm to Colorado students?
- Is the research exploring areas that would be concerning to the public or to parents?*
- Are there appropriate opt-in provisions included in the participation rules?

* If yes, CDE will determine if we need to add outside stakeholders to assist with the review of the applicable research request.

Proposed Researcher Request Process



* If these parties do not approve the research, the process stops and we do not move forward.

Next Steps

- CDE will work to develop the necessary policy, request forms, and other necessary guidance to support this process. This process may take time to finalize.
- As these materials are approved, we will post them on our Research and Data Request page located here:
<http://www.cde.state.co.us/research/researchanddatarequests>.
- If you are a researcher and would like to request Personally Identifiable Information from CDE, you can send an email to DataRequests@cde.state.co.us to start the process.
- Be aware that due to the need to extensively review all research requests, it will take time to vet new research requests. Please ensure that you build into your research plan additional time to complete this process.