



Research Request Protocol

In order to clarify the process for requesting data or assistance for research, and as it relates to the Federal code and HHS regulations pertaining to research conducted using human subjects, this protocol helps guide research conducted by the educational institutions, staff, faculty and administrators of Central Services, Columbia College and Modesto Junior College (MJC).

To assist you in following this protocol, the terms used herein are defined as follows.

Terms Defined

Data Sensitivity: The extent to which data should be protected...the content of the data and the ability to identify individuals or individual students, staff or faculty.

Aggregate Data: Data expressed as total summaries, that encompass multiple groups or units within broad categories...the content of the data could in no way identify an individual.

Disaggregated Data: Data that are not summarized but broken out by single records or unique groups, such as a single section number...the content of the data is unique and can be identified with a single individual or a single small group of individuals. Disaggregated data fall within two more subcategories, a “sensitive” category meaning small groups are easily identified and therefore can be attributed to individuals; and a “highly sensitive” category meaning data are definitely identifiable to individuals, e.g., non directory, or confidential information.

Family Educational Rights Privacy Act (FERPA): A Federal law that prohibits the release of student records (verbally, in writing, or by any other means) without the written consent of the student or a court order or other lawfully issued subpoena, unless there is a specific statutory authorization or a legitimate education interest to be used internally, a need to know (as part of fulfilling job duties) or an emergency.

Informed Consent: Requirements as outlined in *Code of Federal Regulations*, 45CFR.46.116 require that participants must be fully informed about the research activity and their involvement in the research. They must be able to fully comprehend the instructions given to them, e.g., no legalese or acronyms, and be informed of their contribution to, and rights regarding the research prior to participation. The informed consent information must include: a full description of the research activity, what participants will do or provide, what information will be collected and retained, what will happen to that information and how it will be used once the research activity is finished. Any known risks, benefits, and/or uncertainties for participation must be disclosed to the participant before they engage in the research activity, as well as informed that they may opt out of the research study or experiment at any time without any negative effects, penalties, threats or denial of benefits in any way for nonparticipation. Finally, the informed consent must provide the name(s) of those conducting the research and who to contact with any questions regarding any portion of the project (usually the approving officer is named...not the researcher).

Need to Know: Necessary for reasonable operation, strategic planning, and the accomplishment of one's expected and stated job duties, while serving a legitimate educational interest.

YCCD Board Policy 5040

The Chancellor shall assure that student records are maintained in compliance with applicable federal and state laws relating to the privacy of student records.

Any currently enrolled or former student of the district has a right of access to any and all student records relating to him or her maintained by the district.

No district representative shall release the contents of a student record to any third party without the prior written consent of the student, other than directory information as defined in this policy and information sought pursuant to a court order or lawfully issued subpoena, or as otherwise authorized by applicable federal and state laws.

Students shall be notified of their rights with respect to student records, including the definition of directory information contained here, and that they may limit the information.

Directory information shall include:

Student participation in officially recognized activities and sports including weight, height and high school of graduation of athletic team members.

Degrees and awards received by students, including honors, scholarship awards, athletic awards and Dean's List recognition. (Ref. Education Code 76200, et seq.; Title 5, Sections 54600, et seq.)

Requests can be initiated through your college research office. For data requests, there are three levels that determine the data "sensitivity" of the request. Depending on where your research request falls within these three levels, it may be quickly approved and delivered; or could involve a request for additional information or documentation and involve a longer time frame for completion. In the event your request falls within the Level III sensitivity, you may be required to submit substantive background and project information for a more formal review and approval process (please see next page).



Research Request Protocol Guidelines

There are three levels of data sensitivity when considering a request for research data, Level I, Level II, and Level III. Each carries a different request protocol.

<i>Initiate the research request with your institution's Research Office first!</i>		
Data Sensitivity Level	Request Process	Typical Timeline*
<p><u>Level I.</u></p> <p>Data that are highly aggregated, and are not attributable to individuals. These are typically data that are available to the public such as semester enrollment figures or ethnicity ratios for the colleges or district. These are not sensitive data and are usually easily accessible.</p>	<p>Contact the college researcher.</p>	<p>Two working days typically (depending on work loads).</p>
<p><u>Level II.</u></p> <p>These data are not usually readily available. They typically are requested for non-standard aggregates and involve distinct groups, studies, programs or categories. These data <i>could be</i> sensitive, e.g., data by section number, or a single staff program or service. If this is the case, approval must be sought from an administrator.</p>	<p>If approval is needed from an administrator, a signature or email must be received in the Research Office prior to beginning work on the project.</p> <p>If assistance is required to develop a survey, format or assist with statistical analysis, be sure to initiate the request as early as possible and be prepared to provide a complete description of your research project and methodology.</p>	<p>Dependent on workloads, administrator approval must be obtained in order to initiate the work, or if the data already exist, before the data can be released to the requestor.</p> <p>Typically may take between three days to a week to complete.</p>
<p><u>Level III.</u></p> <p>These data are <u>highly sensitive</u> and require careful attention to the research project or study, how the data will be used and stored, and how the results will be disseminated.</p> <p>These requests will always require “informed consent” on the part of the participants and must be pre-approved before the project or study commences. Some may require a more formal review by the District Research Committee or review by administration <u>before</u> the project can begin.</p>	<p>A research request must be filled out and submitted to the Research Office. The researcher will initiate the next steps including a full review of the proposed project, and provide guidelines for the letter of informed consent, survey instruments, data handling and storage, etc.</p> <p>The researcher in consultation with the District Research Committee will determine whether additional approval or review is needed.</p>	<p>Allow several weeks to over a month to complete this process, if a District Research Committee review is necessary.</p>

* Timelines are very generalized and dependent on the complexity of the research request, the involvement of additional resources or staff, e.g., Information Technology, and related workloads.

Please note: If coordination with YCCD or Central Services become necessary, please allow additional time for processing and completing your request.