



Policies for Data Collection, Storage and Sharing

Evaluation Purpose: There are four reasons the GEAR UP SWV Partnership is collecting and evaluating information on the student level.

1. It is a required component of the Department of Education Annual Performance Report and is a condition for continued funding
2. To inform and influence GEAR UP programming decisions at the school and student level
3. To meet the requirements set forth in the grant application and corresponding performance indicators of the proposal
4. To contribute to the collective research on how to improve college enrollment, persistence, and completion rates of students

Consent and Confidentiality: All grant evaluative data are stored on a secure and protected server at Concord University. Files are transmitted through the secure and encrypted “FileLocker” program that allows files to be securely transmitted without using email. All GEAR UP SWV Partnership grant staff that have access to student data are required to sign the “Confidentiality Agreement.” Identifiable student information is never released or reported outside of the grant. Any reports, papers, or presentations cannot release identifiable student information. Evaluation results will be reported in aggregate for any sample less than five individuals.

Applicable policies and regulations: Additional guidance and support of collected data is referenced from:

- Human Subjects Review Board – The Human Subject Review Board (HSRB) serves as the federally recognized Institutional Review Board (IRB) for Concord University. The HSRB helps faculty, staff, and students comply with federal and institutional requirements and policies regarding the ethical treatment of human participants in research. HSRB strives to protect the rights, dignity, welfare, and privacy of human subjects in research conducted by any person affiliated with the university.
- 9(b)(2)(C)(iii) National School Lunch Act (42 USC 1758(b)(C)(iii)- authorizes the limited disclosure of children’s free and reduced-price meal or free milk eligibility information to specific programs or individuals, without prior parent/guardian consent which includes: Federal Education programs-authorized to receive eligibility status only; consent non required
- Family Educational Rights and Privacy Act (FERPA)- Under FERPA, a school may not generally disclose personally identifiable information from an eligible student’s education records to a third party unless the eligible student has provided written consent. One exception to the prior written consent requirement in FERPA allows “school officials,” including teachers, within a school to obtain access to personally identifiable information contained in education records

provided they have “legitimate educational interest” in the information. Additionally, a school may non-consensually disclose personally identifiable information from education records to authorized representatives of... State and local educational authorities for audit or evaluation of Federal or State supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs. Specifically, GEAR UP is authorized to collect student information as outlined by FERPA and IDEA under 20 U.S.C. § 1232g(b) and (h) – (j) and CFR § 99.31.

Types of collected information:

- Demographic and Academic records for each student including, grades, absences, WVGSA test scores, address, birth dates and student state issued IDs
- Service Data- includes required and allowable services established by the US Department of Education, entered monthly based on student participation in GEAR UP activities.
- Student, Teacher, and Parent Surveys- collected responses to further investigate factors that influence academic success. Surveys are distributed electronically and as local counties feel appropriate. Both the parent and student surveys are a required component of the US Department of Education. However, both include an option where individuals who do not feel comfortable can decide not to continue along with discontinuing the survey at any time.