

## Data Management Plan

### **Study Information:**

Title(s): Oregon Promise: Student outcomes and program impacts

Abstract: To make college affordable and accessible for low- and middle-income students, Oregon is offering a statewide Promise program—and it is one of the first states to do so. These place-based programs are designed to help cover the cost of college tuition for eligible students. REL Northwest is partnering with the Oregon Higher Education Coordinating Commission (HECC) to study the impact of Oregon Promise on high school graduates' postsecondary access and success. The primary purpose of this study is to help policymakers determine whether Oregon Promise is a worthwhile investment for all Oregon students, as well as specific groups of underrepresented students. In addition, practitioners can use the results of this study to understand which students may need more support navigating the high school-to-college transition. Finally, this study will be of interest to other states designing similar financial aid programs.

Authors:

Michelle Hodara, REL Northwest at Education Northwest

Leah Childress, REL Northwest at Education Northwest

Principal Investigator's Contact Information:

Michelle Hodara

[Michelle.Hodara@educationnorthwest.org](mailto:Michelle.Hodara@educationnorthwest.org)

503-275-9598

### **Data Sources:**

**Name of Data Source:** K12 administrative student records

**Owner of the Data:** Oregon Department of Education (ODE)

**Year(s):** 2004/05–2016/17

**Variable(s)** *Please include the variable name and brief definition:*

- Student identifiers, student ID, gender, race/ethnicity, free or reduced-price lunch eligibility, English learner status, special education status, migrant education status, discipline incidences, attendance, course enrollment beginning in 2014/15 (including Advanced Placement or International Baccalaureate), state assessment scores, high school graduation status, school, district, urbanicity (NCES codes) of school, charter school flag

**Name of Data Source:** National Student Clearinghouse

**Owner of the Data:** Oregon Department of Education (ODE)

**Year(s):** Fall 2016-Fall 2019

**Variable(s)** *Please include the variable name and brief definition:*

- Student ID and by term, college enrollment records, college type, college completion records, credential/degree type

**Name of Data Source:** High school grade point average (GPA)  
**Owner of the Data:** School districts in the Portland metro area  
**Year(s):** 2015/16 and 2016/17  
**Variable(s)** *Please include the variable name and brief definition:*

- Student ID, cumulative unweighted high school GPA for all seniors in 2015/16 and 2016/17

**Name of Data Source:** Oregon Promise application data  
**Owner of the Data:** Higher Education Coordinating Commission (HECC)  
**Year(s):** 2015/16 and 2016/17 (application year for the 2016/17 and 2017/18 postsecondary academic years)

**Variable(s)** *Please include the variable name and brief definition:*

- Student identifiers, application year and term, awarded flag, disbursed flag, specific reasons for application rejection, course load level at community college by term, Oregon Promise grant award amount

### **Data Confidentiality Procedures:**

REL Northwest has established procedures that comply with applicable federal and state laws and regulations protecting the privacy of study participants, including the requirements of the Family Educational Rights and Privacy Act (FERPA). These procedures include the following protections of personally identifiable information.

***Data-sharing agreement and institutional review board (IRB) approval.*** The custody and disposition of all personally identifiable information provided by educational agencies or other third parties to Education Northwest is guided by a written agreement in the form of a contract or formal data-sharing agreement that delineates the explicit use of the personally identifiable information to be collected, the manner in which the security of the information will be maintained by Education Northwest, and the date upon which this information will be appropriately disposed. This study has executed data sharing agreements with ODE, HECC, and individual school districts for all data outlined in the table above.

This study has been reviewed and determined exempt by Education Northwest's institutional review board (IRB). The work of the Education Northwest IRB complies with all requirements of Title 45, Part 46, of the Code of Federal Regulations (45 CFR 46) for all federally sponsored research and all other human participants research, regardless of the funding source.

***Transferring data.*** REL Northwest will obtain approval from Education Northwest's IRB and secure a signed data-sharing agreement prior to any transfer of data. Transfer of all personally identifiable data to or from Education Northwest's office will be encrypted during transfer by using a secure file server (e.g., SFTP or SCP servers).

Researchers can request the transfer of files from the terminal server only if they contain summary data derived from individual-level records. Disclosure avoidance techniques (such as suppression of small values or blurring by collapsing variables or rounding) must be used to remove confidential information and prevent re-identification of individuals. Education Northwest complies with rules for minimum group size established by the relevant data providers and by IES.

***Management and storage.*** All personally identifiable information exchanged will be protected, stored, disposed of, and otherwise kept confidential, as required by applicable state and federal law, including FERPA.

Once the requested data are received from the data provider through a secure, encrypted file transfer method, the files will be stored un-encrypted on the Education Northwest secure terminal server. Researchers reach the terminal server from their regular office workstations by Remote Desktop Services (RDS) with all applications, data processing, and data storage kept on the terminal server which is in a locked area limited to IT staff members. Off-site Education Northwest employees have access to terminal server using remote desktop protocol (RDP) over virtual private network (VPN) connections with the data, applications, and processing all on Education Northwest's secure server and never transferred to or available from employees' individual computers.

Data are used only for the purposes of the project, described in the data-sharing agreement, and only by representatives of Education Northwest who need access to fulfill the stated purposes. On the terminal server, data are stored in project folders, and only project staff who have an individual confidentiality agreement attached to the project's executed data-sharing agreement can access the folder with the data. Data cannot be extracted from a computer file or database by unauthorized individuals.

***Staff training.*** All Education Northwest staff members who are working on REL Northwest projects that involve personally identifiable information (PII) data have been scheduled at OPM in preparation for obtaining a moderate-level security clearance. All REL Northwest staff members who collect or use personally identifiable information also receive training on these procedures and the ethical standards related to data confidentiality and, in accordance with this policy, will acknowledge in writing their understanding and intent to comply with these procedures. Per ODE and HECC requirements, researchers using ODE and HECC data are required to read and sign the agency's individual nondisclosure form.

***Data suppression and reporting.*** In creating reports, REL Northwest will comply with federal rules for data suppression to ensure student confidentiality in data tables and graphic displays. Data will be suppressed if 10 or fewer students are represented.

**Format for Final Data File:** Alternate data file

**If a Public Use File is not available, why?:** The study is using student-level administrative data from state education agencies and school districts that cannot be posted by IES. Data sharing agreements with these entities do not allow REL Northwest to share the data even in restricted-use form with other parties. Additionally, all data must be destroyed one year after the completion of the study. Data sharing agreements terminate on December 31, 2022, and REL Northwest shall delete all files within (10) days from the date of the agreement termination.