

Kessler Scholars Collaborative Evaluation: Data Sharing

Frequently Asked Questions

Do institutions need to obtain consent of students to provide personally identifiable data from educational records for the Program evaluation?

FERPA permits institutions to disclose PII from students' education records without student consent to organizations conducting studies for, or on behalf of, postsecondary institutions. The evaluation activities conducted by Ithaka S+R and the Kessler Scholars Collaborative therefore meet the necessary criteria for a FERPA exception to the consent requirement. As outlined in the Data Use Agreement, student data will only be used for the purpose of evaluation.

As articulated in the Call for Proposals issued by the American Talent Initiative and the Kessler Scholars Collaborative in Winter 2021, to receive grant funds all institutions must fully participate in data collection activities, including sharing student-level data. As detailed in the Data Use Agreement, any results of the evaluation will only be reported at the aggregate institution- or Collaborative-level.

Will Ithaka S+R or Kessler collect data directly from students?

Yes, in the form of student surveys and focus groups. Those activities will include explicit informed consent from students. Student responses to surveys and focus groups will be de-identified for reporting purposes. However, students will have the option to consent to sharing their individual-level responses with Kessler Scholars Program staff on their respective campus.

What entities will have access to student data?

The Managing Partners (Ithaka S+R, Kessler Scholars Collaborative, and Aspen Institute) are granted access to student data. In practice, only staff at Ithaka S+R and the Collaborative will be working with the student data.

What will the data be used for?

The data will inform the programmatic evaluation. Specifically, Ithaka S+R will be assessing Kessler Scholars Program activities and measuring implementation fidelity. The evaluation will also capture student experiences, assess short-term academic progress, and produce internal and external reports to inform programmatic improvement and the broader field. The student-level data elements requested by Ithaka S+R are directly aligned with project aims, allow evaluation activities to be linked throughout the project work, and enable longitudinal analysis (in possible collaboration with other data sources, like the National Student Clearinghouse or student survey data).

Do the Managing Partners intend to publish any findings or will any disclosure be limited to a single institution's program evaluation?

Ithaka S+R, the Collaborative, and the Aspen Institute may publicly present or publish findings with aggregated and de-identified data. The publication or presentation may only identify a specific institution with prior consent from the institution. Should an institution wish to present or publish findings related to the Kessler Scholars Program on their campus, we ask that you please reach out to the Collaborative to discuss. In these instances, we also advise the institution to seek an institutional IRB.

Is there a plan for an application for institutional IRB?

The Program's evaluation plan and activities will be submitted to an external, commercial Institutional Review Board (Pearl IRB) for evaluation and approval. Institutions also may choose to submit an institutional IRB, but signing the DUA means the College agrees to defer to the decision of the external IRB obtained by Ithaka S+R.

What are the mechanisms for safeguarding FERPA data?

All Data containing PII shall be transmitted to Ithaka S+R by secure electronic transfer and stored in a secure system. Specifically:

- Data are stored in the US.
- Data are stored in the cloud AWS and in S3 buckets.
- Each institution uses a unique set of credentials to access the FTP server and upload/download their data file. Although data is transferred using an FTP server, this server acts only as a proxy for AWS S3 and no data is stored directly on the FTP server itself.
- Ithaka S+R team members copy files from S3 to both local and network drives for doing their research using Stata (statistical software). File directories on the file-servers are permission-based, restricted to S+R staff only, and controlled via Group-Policy and Active Directory.
- We rely on S3 when data is on the FTP server. When we download files from the FTP environment and save them on the file server in our infrastructure, that server is on our network and backed up in our data center. We rely on disk-based (SAN) backups within the data center. We do not use tape-based backups. Interaction with the FTP Server is done utilizing SFTP. When a file is copied locally to be analyzed, local laptop hard drives are encrypted. S3 is also encrypted.
- For reference, you can also view documentation from Ithaka's [SOC-2 audit here](#)