



Pennsylvania Department of Education Institutional Review Board (PDE IRB) Research Application: Human Subjects Protection Review

Attachment J: Electronic Data Security Plan/Evidence of Compliance

The Researcher shall provide a description of the procedures that will be taken to ensure that the requested data is handled, stored, maintained, analyzed and reported in a manner that is in compliance with Pennsylvania Department of Education's "Student Data Access and Use Policy" and the conditions in the "Access Agreement for PIMS data".

Project Title:

PI Name:

1. Will PDE identifiable electronic record information be transported or transferred from the state agency to the research site(s) using an agency-controlled secure file transfer protocol?

Yes

No. Describe the record transfer method proposed.

2. Will PDE identifiable electronic record information be transferred over the Internet between the research site(s) and other researchers or other research sites?

No

Yes. Describe how, when, and to whom such transfers would occur:

3. Storage of PDE identifiable electronic record information (check all that apply).

Local workstation hard disks (encryption and authentication required)

Hard disks on network servers maintained in a secure area (authentication required)

CDs or DVDs used in local workstation optical disk drives maintained in a secure area (encryption and authentication required)

CDs or DVDs attached to network servers maintained in a secure area (encryption and authentication required)

Portable devices or media (i.e., laptop/notebook computers, portable hard disks, flash drives, etc.) taken outside a secure area (encryption, authentication and locked storage required)

Other – specify:

4. Describe the procedures that will be used to keep the PDE identifiable electronic record information physically secure at the research site(s).

5. Will the PDE identifiable electronic record information be accessed remotely through Citrix, VPN, or a similar facility?

No

Yes. Describe the location in which confidential record information would be remotely accessed. Note: the location must be physically secure or in a private setting to prevent inadvertent disclosure of confidential record information.

6. Will PDE identifiable electronic record information be segregated or otherwise kept distinguishable from all other record information used in this research? Note that if PDE records are not segregated from other records, all comingled records are subject to the “Student Data Access and Use Policy” and the conditions in the “Access Agreement for PIMS data”.

No

Yes. Describe how PDE record information will be segregated.

7. What method will be used for the disposition of the PDE identifiable electronic record information when all research objectives have been accomplished?

All research records containing PDE identifiable record information will be de-identified

All research records containing PDE identifiable record information will be destroyed. Specify how these records will be destroyed:

All research records containing PDE identifiable record information will be returned to the agency. Specify to whom the records will be returned:

8. Additional information on how data will be handled, stored and disposal?

As Principal Investigator, I have read and understand the requirements in the “Student Data Access and Use Policy” and the conditions in the “Access Agreement for PIMS data”, and I assure that all procedures for maintaining PDE electronic records information disclosed for this research will be consistent with requirements in the Exhibit. I understand that any compromise or potential compromise of PDE record information disclosed for this research must be reported to the PDE Division of Data Quality within one (1) business day of discovery.

Principal Investigator’s Name:

Signature:

Date:

