Attachment G - Assurance of Confidentiality for School-Associated Violent Death Study

ASSURANCE OF CONFIDENTIALITY FOR THE SCHOOL-ASSOCIATED VIOLENT DEATHS STUDY

Surveillance Branch Division of Violence Prevention National Center for Injury Prevention and Control Centers for Disease Control and Prevention

Surveillance for school-associated violent deaths is being conducted by the Centers for Disease Control and Prevention (CDC), an agency of the United States Department of Health and Human Services. The information collected by CDC is obtained through interviews with school and law enforcement officials, and abstracted from law enforcement records. This information includes, in part, the school history, legal history, family history, and psychological history on the victims and/or perpetrators. The SAVD data are used for research by CDC scientists to help understand and prevent the occurrence school-associated violent deaths.

Information collected as part of the SAVD study, both now and in the past that would permit identification of the individuals, schools, or communities is maintained at CDC and collected by CDC under Section 306 of the Public Health Service (PHS) Act (42 USC 242k) with an assurance that it will be held in strict confidence in accordance with Section 308(d) of the PHS Act (42 USC 242m). The Assurance of Confidentiality is provided by the CDC's Office of Scientific Integrity's Privacy and Confidentiality Unit. It will be used only for purposes stated in this Assurance.

The SAVD information may be released under the following specific circumstances only:

1. Identifiable data may be shared only with guest researchers, fellows, and students currently working on this project at CDC facilities. These individuals are required to sign a confidentiality pledge for non-CDC employees before access to any confidential data is permitted. Also, these individuals work under the direct supervision of either the Team Leader, within the Etiology Team.

No identifying information will be made available to any other parties. In particular, such information will not be disclosed to insurance companies; to parties involved in civil, criminal, or administrative litigation; to federal agencies; to state or local agencies; to family members; or to any other member of the public.

Information within this surveillance program will be kept confidential and, aside from authorized School Associated Violent Death Study Team employees, appropriate guest researchers, fellows, and students, no one will be allowed to see or have access to the information. Individuals with approved access will be required to handle the information in accordance with procedures

outlined in the CDC Staff Manual on Confidentiality and to follow the specific procedures documented in the Confidentiality Security Statement for this project. Identifiable data sharing with other CDC components will be done in accordance with procedures outlined in this project's Confidentiality Security Statement.

Specifically, during the study, data will be secured through the use of technical, physical, and administrative controls. Hard copies of data (i.e., law enforcement investigative reports and interviews with school and law enforcement personnel) will be kept under lock and key in secured offices in the DVP. These offices are located on the CDC's Campus, a secured facility that can be accessed only by presenting the appropriate credentials (i.e., identification badges and smart cards). The building housing the DVP offices can only be accessed using a key card that has been previously authorized by CDC security. Digital data will be stored and backed up nightly onto the NCIPC DVP LAN (which is maintained onsite). These data are secured using technical controls (user identification) that only allow the directory associated with the SAVD system to be accessed by individuals who have been granted authorization by the study PI. The access list to this directory is audited annually and as needed (e.g., when a staff member leaves the study). Over the course of the study, data will be reported in the aggregate, such that no individual case can be identified from the reports. Once data collection is deemed complete, all records bearing identities of the victim, alleged offenders, informants, schools and communities will be destroyed.