

L2. Westat Confidentiality Agreement

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PROTECTING THE CONFIDENTIALITY OF HUMAN SUBJECTS AND DATA OBTAINED DURING DATA COLLECTION

SNACS II STAFF MEMBER'S ASSURANCE OF COMPLIANCE

A. Summary

SNACS II project, jointly conducted by Mathematica and Westat, is firmly committed to the protection of the confidentiality of data obtained in our studies from unauthorized use or disclosure and the rights of human subjects in research studies. This commitment is crucial to our research work because:

- It is required by our contract and by the ethical codes of contract research organizations; and
- Human subjects participating in research studies are promised and expect confidentiality and must have confidence in our commitment to it.

B. What is protected?

Three main types of information are to be protected from unauthorized disclosure or use:

1. The names and other identifiers of human subjects in research studies (i.e., information collected from or about persons or organizations participating in the study),
2. Data collected about human subjects in research studies, whether collected directly from the respondent, indirectly from another source, or learned incidentally. This includes data that is obtained by intervention or interaction with a respondent or data that is identifiable private information.
3. All other information collected or developed under the SNACS II project until release of such information has been approved. This includes research data with identifiers removed, data files, listing and sampling information, study findings, progress reports, project documentation, project reports and other project deliverables.

C. Who is covered by this policy?

All SNACS II staff members, including consultants, subcontractors, field staff, and other service providers who may have access to confidential information must comply with this confidentiality policy. Section D below presents each compliance requirement. All SNACS II staff and data collectors must acknowledge each compliance requirement (with their initials), and sign the individual assurance of confidentiality.

D. Compliance Requirements

Data collectors are expected to respect the privacy and property of survey respondents by adhering to this policy and the compliance requirements. Data collectors must review, accept, and acknowledge the following compliance requirements.

Compliance Requirements	INITIALS
1. I will preserve confidentiality, protect human subjects' privacy, and follow appropriate study procedures.	
2. I will keep the names of respondents confidential. I will also keep confidential all information or opinions collected in the course of study interviews, and any information about respondents learned during field work. I will not discuss information collected or observed with any other person, except for supervisors on the SNACS II project.	
3. I will not disclose or use confidential information in a way that has not been authorized.	
4. I will devote my best efforts to preventing unauthorized or accidental disclosure of any survey data.	
5. I will devote my best effort to limit access to survey data to only those persons who are working on SNACS II project and only to those who have been instructed in the applicable confidentiality requirements.	
6. I will not record or copy any information obtained during data collection to any source or material other than the study materials approved by SNACS II.	
7. I will devote my best effort to maintain the security and protection of data entered into the SMS using a computer or an application on the smartphone provided by the SNACS II project staff.	
8. I will scan and upload hardcopy forms used in onsite data collection to the SMS via a secure internet connection as soon as possible, without delay.	
9. I will strictly follow all procedures for backing-up and transmitting data files. I will not implement data procedures that are not according to the SNACS II protocol.	
10. I will not transmit, transfer, or copy data files to any device that is not provided by the SNACS II project staff or is not specified in the SNACS II training procedures and/or manuals.	
11. I will not email files or documents that have information that can identify other SNACS II field staff, or survey respondents by name, age, gender, address, or school.	
12. I will not add any names or identifying information in the study phone contact list for any school entity or study respondent.	
13. After a school entity or respondent has been contacted via text message or phone call, I will clear the conversation and all information stored in the phone call logs from the phone soon after the conversation has ended.	
14. I will report any potential or actual breaches of confidentiality or security procedures to supervisors immediately.	
15. I will comply with all applicable procedures and good practices required by SNACS II.	
16. I will ensure that there is compliance with this policy and all applicable procedures.	

E. Pledge:

I hereby certify that I have carefully read, understand and promise to comply with this SNACS II compliance requirements for protecting the confidentiality of human subjects and research information obtained during data collection.

I will learn, understand, and fully comply with the applicable procedures and good practices for protecting confidentiality and human subjects in my work.

I will cooperate with and fulfill all related education and training required by SNACS II. I understand that the requirements may be changed over time or expanded in order to deal with special circumstances or client requirements.

I understand that a violation of this assurance is sufficient grounds for disciplinary action, including dismissal. In addition, a violation of the privacy rights of individuals through unauthorized discussion, disclosure, dissemination, or access may make me subject to criminal or civil penalties.

I give my personal pledge that I shall abide by this assurance of confidentiality.

Printed Name

Signature

Date