

Attachment 6- CCQDER Data Retention Policy

Data Retention Policy

Data Retention Period: Data retention specifies length of time the recording may be retained. The data retention period for recordings of interviews that do not have consent for future use is until the completion of the project (upon completion of a final product or final sponsor briefing). Upon project completion, these non-retained recordings will be destroyed by designated Collaborating Center for Questionnaire Design and Evaluation Research (CCQDER) staff. For those interviews being maintained for future use, the data retention period for storing the interview recording will begin after the conclusion of each project (upon completion of a final product or final sponsor briefing). Restricted recordings will have an initial retention period of 2 years after project completion, and non-restricted recordings will have an initial retention period of 5 years after project completion. After the initial retention period, the recordings will be re-evaluated by the CCQDER Director to determine relevance, ongoing usefulness, and qualitative value for likely use in question evaluation research. If it is determined by the CCQDER Director in conjunction with CCQDER project-relevant staff that there is no valid reason to retain the recording, it will be destroyed by designated CCQDER staff. If the interview continues to be of value (defined as ongoing use by research staff, topic relevance, likely use for federal questions evaluation research), reassessment of the recording will occur again in either 2 years (for restricted interviews) or 5 years (for unrestricted interviews).

Interview Retention Status Matrix

Retention Status Categories	With Special Consent*		Without Special Consent**		No future use consent^
	Unrestricted Interview	Restricted Interview+	Unrestricted Interview	Restricted Interview+	
Viewing Audience	- Internal project related - Collaborator - Project specific training - Internal research related - Research Interests - Conferences - Classroom Training	- Internal project related - Collaborator - Project-Specific Training - Internal Research Related - Research Interests	- Internal project related - Collaborator - Project-Specific Training	- Internal project related - Collaborator - Project-Specific Training	NA
Stored Data Type	Video or Audio	Audio only	Video or Audio	Audio only	Destroyed
Data Retention Reviewing Period	Assessed every 5 Years	Assessed every 2 Years	Assessed every 5 Years	Assessed every 2 Years	NA

*Interviews for which special consent has been obtained

**Interviews for which special consent was not obtained either because it was not asked (minors or designated projects) or because special consent was not granted by the respondent

^Interviews with no future use consent are not maintained.

+Restricted interviews consist of interviews conducted with minors, adult proxy for minors, and/or those pertaining to illegal behavior (i.e. self-reported or proxy reported).

Protocol for Determination, Maintenance and Safeguarding of Interview Recordings

Each interview will receive a retention status based on both respondent and project level considerations and defined within the Retention Status Matrix. Ethics Review Board (ERB) packages will denote whether a project falls into the restricted or unrestricted designation. If the research requires a different policy than indicated by the matrix, a justification will be provided at that time.

All consent forms presented to the respondent at the beginning of the interview will disclose the eligible viewing audience, the recording type as well as the terms for data retention for the particular project. Informed consent documents contain the sentence “When the interview is finished, you may watch/listen to the recording.” If after viewing or listening to the recording, the respondent rescinds his/her earlier consent to be recorded or to have his/her recording retained the recording is destroyed. If a respondent chooses to terminate the interview, they will be asked for consent to retain the completed portion of the interview. If the respondent does not grant consent, the interview will be destroyed. Respondents are also given a copy of the form, containing information about how to contact the CCQDER Laboratory Manager, the NCHS Ethics Review Board Chair, and the NCHS Confidentiality Officer.

In cases where Special Consent is requested, the respondent is asked for Special Consent at the end of the interview and after receipt of remuneration. The special consent statement discloses the audience and retention terms specific to the particular project. If the respondent grants Special Consent, he/she is told that if for any reason they change their mind, they should contact the laboratory manager by calling or writing to change the status of the recording. If a respondent does not grant Special Consent, the respondent is informed that the recording will only be seen or heard by CCQDER staff, QDRL contractor staff working as designated agents on behalf of the CCQDER, or direct study collaborators, which is described in the initial informed consent form.

Each interview recording will be assigned a unique identifier, which specifies the respondent, the project and the retention status of the particular recording. The unique identifier will be assigned by the lab manager immediately after the interview when the recording is saved. With this approach, the status will always be attached to the recording.

After the analysis has been conducted at the conclusion of each project (as determined by the submission of a final report or similar product), interviews with no future use consent or special consent will be destroyed. Additionally, restricted interviews determined to be stored as audio-files will be stripped of video. The period of data retention will commence from the time of this distinction and reviewed according to their retention classification. Assessment of recordings will be every 2 to 5 years (depending on the particular review period) using the Questionnaire Design Research Laboratory (QDRL) Outlook Calendar.

Recordings that are shown outside of the QDRL will be temporarily transported and stored on an encrypted thumb drive which is only accessible by the specific CCQDER researcher to which it was issued. The warning, “Recording of this material is prohibited,” will be included in presentation materials (e.g., PowerPoint or presentation slides) when recordings are shown outside of the QDRL, for example as part of conference presentations.

At roughly a month in advance of the 2- or 5-year review period, interviews will be evaluated on the criteria of 1) current research using the project data since last review 2) current relevance of questions evaluated and 3) qualitative value for likely use in question evaluation research. If any of the 3 criteria are met, the interview will be kept with a renewed retention period and re-evaluated every 2- or 5- years according to the assigned retention status. Rationales for retaining interviews must be attached to each interview media file to serve as an audit trail. A report documenting the number of interviews retained and destroyed will be produced annually by CCQDER staff.

Recordings of interviews from past CCQDER projects are currently stored in accordance with the consent guidelines that were in effect when they were created. After adoption of the new data retention and storage plan, these stored files will be identified and assessed according to the new policy. This new assessment will take place after CCQDER files have been migrated to the new software system (which is expected facilitate the implementation of the policy).