



College Sports Project

**Center for Data Collection
and Analysis**

Resource Toolkit

Updated:
November 13, 2007
w/ New Version of FAQ Document

Contents of the Resource Toolkit for the College Sports Project

The purpose of the CSP resource toolkit is to make conveniently available to IR directors and registrars at CSP participating institutions some background materials that may assist them in responding to requests for data by the CSP Center for Data Collection and Analysis.

Of course there are substantial differences among the participating colleges and universities, and local circumstances will lead to different needs. Several of the items in this Resource Toolkit have been prepared by a variety of individuals and groups involved in the CSP project, in some instances on a voluntary basis, and they have been assembled by the CSP Center for Data Collection and Analysis. Although the CSP has taken steps to vet the information prepared by these various parties, we cannot guarantee their absolute accuracy. In making the Resource Toolkit available, the CSP Center does not intend to provide legal advice to participating institutions. We hope that these materials will help clarify some issues and facilitate the work of local institutions as they respond to requests for data collection.

Materials list and brief description:

1. CSP Web Site (Online)

For general information about both the “representativeness” and “integration” initiatives, and for a list of participating institutions, consult our web page at: <http://www.collegesportsproject.org/>.

2. CSP FAQ p. 4 - 19

Explains the origins and purposes of the College Sports Project and its organization as two distinct but necessarily related projects addressing “representativeness” and “integration.” Outlines the purposes and the structure of the CSP database, and addresses issues of confidentiality, privacy, and data security. Addresses many questions relating to the mechanics and logistics of the data collection process. Addresses technical questions about variables that are requested from participating colleges in the data collection process.

3. Presidents’ Letter Dated 11/22/04 p. 20 - 22

From The Andrew W. Mellon Foundation to Division III presidents extending invitation to participate in CSP.

4. Nomination of Official Institutional Contact Person for CSP Data Collection p. 23

Updated version of a request form originally sent to CSP presidents of participating institutions on December 2, 2005. Asks that appropriate staff member at participating institution be identified as contact person for requesting data.

5. Middlebury College Request for Approval of Human Subjects Research p. 24 - 27

The CSP Center for Data Collection and Analysis is funded by a grant to Middlebury College, Middlebury, Vermont from The Andrew W. Mellon Foundation. John Emerson, Professor of Mathematics and Dean of Planning is the Principal Investigator for this grant. Because of Middlebury’s unique role in creating this large-scale data collection project and the related Center

at Northwestern University, Emerson requested that Middlebury's Institutional Review Board review the entire data collection project. The project received IRB approval on January 18, 2006. The completed Middlebury IRB form is available to CSP participants for their information and review. An amendment to the original application was also approved on August 22, 2006.

6. Excerpts from the Confidentiality Agreement **p. 28 - 30**
Between Middlebury College and The Andrew W. Mellon Foundation

A nine-page confidentiality agreement was executed between Middlebury College and The Andrew W. Mellon Foundation, and a similar agreement was executed between Northwestern University and The Andrew W. Mellon Foundation. The item provided here contains several paragraphs excerpted from the Middlebury document to illustrate the policies agreed to in order to help ensure security of CSP data and information.

7. Cover Statement Pertaining to Need for Student Disclosure Notice **p. 31**

Brief summary of requirements by Family Educational Rights and Privacy Act (FERPA) for disclosure of access to student educational records.

8. Template for Student Disclosure Notice **p. 32**

A draft form that may serve as a guide or illustration for the notification to be placed in students' official records, as required by FERPA. Participating CSP institutions are legally obligated to place notification of the CSP's access to student information in each student's educational record; the notice can be in electronic form.

9. Selected Laws and Regulations Affecting the CSP **p. 33 - 35**

Additional information about laws relating to the CSP data collection effort. This document provides legal background from FERPA pertaining to privacy and confidentiality of student records. Its discussion is based on advice provided by outside counsel to the Mellon Foundation and shared with the CSP Center for Data Collection and Analysis.

10. List of NCAA Sports Codes **p. 36 - 37**

Codes used for recording the sport(s) in which a student-athlete was recruited, and in recording intercollegiate athletic participation at college.

11. Link to CIP Codes **(Online)**

CIP2000 codes for academic majors are available at <http://nces.ed.gov/pubs2002/cip2000/index.asp>. Four digit codes of form XX.XX are used by the CSP.

12. Compilation of State Laws Pertaining to Use of Social Security Numbers

This information does not relate to the CSP because its data collection does not use social security numbers. As a service to participating institutions, John Emerson can supply information on request. Send e-mail requests to jemerson@Middlebury.edu.

CSP Frequently Asked Questions (FAQ)

Introduction: This document describes the purposes of the College Sports Project and, in particular, the project on “representativeness” of college athletes and its related data collection. For convenience, we describe the project using a question-and-answer format.

1. What is the College Sports Project (CSP)?

The CSP is a national program initiated in June 2003 by The Andrew W. Mellon Foundation (the “Mellon Foundation”). The CSP represents over 130 participating institutions and has programs in two main areas:

- (1) Representativeness—ensuring that intercollegiate athletes are representative of their student bodies, in part by collecting student data in a form useful for gauging progress toward closing the cultural divide between academics and intercollegiate athletics, and
- (2) Integration—integrating athletics more fully into the educational missions of our colleges. The CSP offers these programs to interested members of NCAA Division III.

The Mellon Foundation has made a grant to Middlebury College to manage the data collection and analysis aspects of the Representativeness Project. Middlebury in turn has made a sub-award to Northwestern University to create and run the CSP Center for Data Collection and Analysis where staff will assemble the database and analyze data, and report on it back to the participating colleges and universities.

2. How long will the College Sports Project last?

The Mellon Foundation will fund the program through June 2010. If the program continues beyond that date, the Mellon Foundation may elect, in consultation with participating colleges and universities, to have the CSP become an independent, self-sustaining entity.

3. What does participation in the College Sports Project mean?

On a philosophical level, participation represents a commitment to two core principles: (1) athletes are first and foremost students; they should be “representative” of all other students, particularly in terms of academic outcomes and opportunities for engagement in campus activities; and (2) intercollegiate athletic programs must be properly aligned with colleges’ and universities’ primary missions; this requires the integration of coaches and athletic administrators into the mainstream of campus educational life, as well as the

cultivation of greater faculty understanding of the potential educational values of athletic programs.

Participating institutions will provide data that measure several dimensions of their student athletes' "representativeness," and they will pursue "integration" activities that address campus-wide communication and decision making, hiring practices, performance reviews, and professional development opportunities for coaches and athletic administrators.

4. *What does the CSP Program on Integration actually do?*

On many campuses, athletics is viewed as a separate enterprise, distinct and often disconnected from colleges' and universities' educational missions. Coaches and athletic administrators, once a seamless part of the institutional culture, frequently find themselves outside of the educational enterprise. In this context, the "integration" initiative represents a collaborative effort on behalf of faculty members, coaches, students, and academic and athletic administrators to restore athletics to a valued and complementary role within an institution's academic and co-curricular life. The process of achieving integration represents a fundamental cultural shift that encompasses an institution's definition of athletic success, the "scorecard" used to hire and evaluate coaches, and the recognition among academic faculty and coaches of their shared roles as mentors and teachers.

5. *Who are the individuals responsible for the CSP's "Representativeness" project?*

John Emerson, the Charles A. Dana Professor of Mathematics and Dean of Planning at Middlebury College, is the Principal Investigator for the project that has established the CSP Center for Data Collection and Analysis at Northwestern University. Dr. Rachelle Brooks is the Director of the CSP Center for Data Collection and Analysis. She has served as Associate Director of the Center for Assessment of Higher Education (CAHE) at the University of Maryland and previously as Director of Research for the project, *Assessing Quality of University Education and Research* (AQUER) of the Association of American Universities. Aaron Hosmon, Assistant Director of the Center, recently completed a master's degree in the School of Education and Social Policy at Northwestern University. David Hoffenberg, a software engineer at Northwestern, is the CSP Database Developer.

A Technical Advisory Committee chosen for its members' expertise in institutional and survey research, and chaired by John Emerson, worked with Dr. Brooks on designing the database and developing detailed specifications of the study variables. A Data Security Task Force has provided an external review of procedures for the submission and storage of CSP data, with special attention to secure data transmission, secure storage of data, and special handling of personally identifying information in student records. A Board of Advisors representing presidents, provosts, athletic directors, faculty, and coaches advises

Professor Emerson and Dr. Brooks on policy issues not already covered by the Mellon Foundation's confidentiality agreements with Middlebury and Northwestern. Michael McPherson, President of the Spencer Foundation and former president of Macalester College, chairs this Board. The members of the Technical Advisory Committee, the Data Security Task Force, and the Board of Advisors are identified in FAQ #35.

6. *What is the CSP database and what is the purpose behind its creation?*

Ideally, students who participate in intercollegiate athletics are similar to their classmates from the standpoints of academic preparation, educational outcomes, and participation in the life of the campus community. The CSP database will assemble data from participating institutions on characteristics of all students in particular cohorts tracked longitudinally and supplemented with data from other sources. The CSP database will consist of two separate schemas: one with personally identifiable information, and the second for research and analysis. The CSP database research analysis schema will *not* include individual student identifiers— all names, addresses, dates of birth, and institutional student IDs provided by the participating institutions will be stripped from record-level student data, encrypted, and securely stored (see FAQ #9, #11, #13, and #24).

The Mellon Foundation's primary purpose in creating the CSP database is to enable participating colleges and universities to quantify student athletes' academic outcomes in terms of their "representativeness," and to track institutional changes over time. These data will not be used to "police" institutional behavior, but rather to provide data that the president and other campus leaders may find helpful in meeting institutional goals. Responsible tracking of outcomes that colleges and universities care about is increasingly recognized as a "best practice" in higher education, and the database should be viewed as a valuable resource in this effort. The Mellon Foundation's experience suggests that research is an important tool, not only for uncovering shortcomings and monitoring trends, but also for documenting and communicating successes. The Mellon Foundation is optimistic that this database will serve such a purpose, and it encourages institutions to choose to share data at the conference level and among other mutually respected subgroups.

7. *What kinds of data are we talking about?*

The variables reflect two levels of measurement: Tier I variables will measure academic outcomes such as college grade point averages and graduation rates. Tier II variables, which are input or admission measures (test scores and secondary school grades and class rank), will be used in assessing the degree to which any differences in college academic outcomes for athletes are linked to differences in their entering qualifications. Participating institutions will be expected to contribute student-level data on Tier I and Tier II variables for student cohorts in their first year of matriculation and to update the data annually until the

students have graduated or left the institution. In each subsequent year of the project, an additional new student cohort will be added to the participating institution's data collection.

Although there are a number of other important educational measures that institutions may wish to study (such as students' participation in campus cultural activities, study abroad, community service, internships, and senior projects), the CSP Center for Data Collection and Analysis will limit the focus of centralized data management, especially at the outset of this project, and perhaps indefinitely, to clear, unambiguous academic outcomes. The Mellon Foundation encourages colleges and universities to examine other optional variables on their own. Of course, the CSP could expand the project's focus over time to include more of these data if participating institutions thought this was desirable and feasible.

8. *What is the purpose of requiring the collection of individually identifiable data?*

The main reason for requiring individually identifiable data is to permit appending data from institutional records with data on the same students collected from other sources. For example, data from the CIRP Freshman Survey and from the descriptive questionnaires completed by students when they take the ACT or SAT exams would allow the Center to compare the attitudes and motivations of athletes at the time of entry to college with those of other students. Data from the National Student Clearinghouse, which permit tracking of college students as they transfer among institutions, would allow us to determine whether students (athletes and others) who drop out of a participating college graduate from another institution. Data from the National Survey of Student Engagement can help colleges and universities understand the daily experiences of their students, including those that go beyond the academic performance measured by the CSP. These linkages will enable the project both to develop stronger measures of representativeness and to better understand factors that may influence the degree of representativeness of athletes at particular colleges. Acquisitions of relevant data from third-party databases will be made only with prior approval of the Mellon Foundation program officer responsible for this project in consultation with the Board of Advisors of the CSP Center for Data Collection and Analysis.

9. *What information will be used for initial identification of individual students?*

The CSP will collect names, home addresses, dates of birth, and institutional student IDs to serve as a basis for verification of records with participating institutions, for the annual updating of such records, and for use in linking records to those acquired from external databases such as those assembled by CIRP and the National Student Clearinghouse. The personally identifiable information will be stripped and separated from other incoming data, and stored in encrypted form in a restricted schema of the CSP database. The CSP database server will be housed in a secure facility behind layers of firewall protection (see FAQ #11, #13, and #24).

10. *Can colleges and universities share personally identifiable information, such as names, addresses, dates of birth, and institutional student IDs, in connection with research projects such as the CSP?*

Some institutions have asked the CSP Center for Data Collection and Analysis (CDCA) for additional information relating to laws that may be relevant to the data collection effort, in particular, the Family Educational Rights and Privacy Act (FERPA). After legal analysis, the Foundation, in cooperation with CSP Investigators at Middlebury College and Northwestern University, has concluded that the CSP data collection effort is in compliance with these laws, provided that certain criteria are met. These criteria and an additional discussion of relevant laws and regulations are included in FAQs numbers 31 through 33 and in the CSP Resource Toolkit, under the link “Selected Laws and Regulations Affecting the CSP Project.”

11. *Where will the CSP database be maintained?*

The CSP database will be maintained and analyzed by the Center for Data Collection and Analysis at Northwestern University, a major research university (and NCAA Division I member) experienced with the design, maintenance, and security of complex databases. The physical servers will be housed at Northwestern's Information Technology Computing Services secure Data Center facility. Student names, addresses, dates of birth, and institutional student IDs will be separated, encrypted, and stored in a restricted data cleansing and matching schema, authorized only to database administrators.

12. *What is the CDCA's role? What kind of reporting will occur?*

The CSP Center for Data Collection and Analysis (CDCA) will analyze student-level data from participating institutions and will mail confidential reports back to each college and university president based on the information submitted. These reports will also include data that benchmark the institution's results to those of all participants. Upon request, the center will provide reports for conferences or other subgroups, but only with the unanimous consent of the institutions in the conference or other subgroup. Presidents will determine those within the institution (other administrators, faculty members, trustees, etc.) who will have access to these statistical reports. Beyond the level of the individual institution (which will, of course, have access to its own results), the College Sports Project will only report statistical findings that are aggregated over multiple institutions. The center will periodically prepare public reports summarizing broad trends in various measures of representativeness.

13. *How will confidentiality and the security of data be maintained?*

The Mellon Foundation and the College Sports Project investigators at Middlebury and Northwestern recognize that building trust in a responsible, professional manner requires a keen understanding of institutional sensitivities about the nature of the data being shared.

The CSP has adopted the following confidentiality principles and practices:

- a. Participating institutions initially submit data files to the CSP Center for Data Collection and Analysis over the Internet using a browser-based upload tool that will provide encrypted transfers.
- b. Data files will be received at Northwestern's secure, fire-wall protected Data Center facility and deposited into a special-purpose secure file transfer server.
- c. All sensitive data temporarily decrypted for processing by the CDCA will be overwritten using a secure delete program.
- d. The name, address, date of birth, and institutional student ID will be separated, encrypted, stored in a restricted and secure schema, and used only when necessary for record verification with a local institution, for the annual updating of the database records, and for eventual acquisitions of relevant data from third-party databases.
- e. As described in item #8 of this FAQ, the personal identifiers will be used for appending data from institutional records with data on the same students collected from other sources. Note that in order to append data, the CDCA will need to disclose select personally identifiable information that institutions classify as directory information to third party database organizations. Such third-party organizations will be allowed to use the data provided them only for the purposes of providing the CDCA with the requested supplementary data.
- f. When tabulating data and performing statistical analyses, CSP research personnel will not have access to student names, addresses, dates of birth, and institutional student IDs.
- g. Names, addresses, dates-of-birth, and institutional student IDs will be destroyed when the research and project needs for them have ended.
- h. Periodic reports on broad trends will use aggregate data such that individual students and individual institutions cannot be identified. To protect the confidentiality of students, no item will appear in any report where the data permit inferences about an individual student.
- i. Persons at Middlebury College and at Northwestern University responsible for overseeing and conducting the collection of data and its analyses have signed detailed confidentiality agreements with the Mellon Foundation as a condition of the Mellon Foundation's grant to Middlebury College.

14. *Who owns the CSP database?*

The Mellon Foundation is the owner of the CSP database.

15. *Can a participating institution withdraw its data?*

Should a participating institution wish to discontinue involvement in the project, it has the right to remove its institutional data from the CSP database.

16. *Will scholars have access to the database in the future?*

The Mellon Foundation may elect to make future use of the stripped data for research on higher education that is consistent with FERPA. Should the CSP Center for Data Collection and Analysis gain the confidence and respect of participating Division III colleges and universities sufficient to sustain its operation beyond 2010, the database may prove to have broader value to the scholarly community beyond the Mellon Foundation and the CSP representatives at Middlebury and Northwestern. We do not wish to foreclose this possibility even though it is not a priority at this time. Indeed, the Mellon Foundation has determined that no third-party scholarly use of the data will be made during the first five years of the Center's operation, and any future use would depend on judgments by the Mellon Foundation with input from the CSP Board of Advisors about the desirability of such research. The research would be subject to rigorous confidentiality obligations, and researchers would only have access to data stripped of personal identifiers.

17. *What is the future of the College Sports Project beyond the first five-year grant made by the Mellon Foundation?*

The Mellon Foundation hopes that the participating colleges and universities will actively participate in framing the future of the College Sports Project. If the integration initiatives and the reports of the Center for Data Collection and Analysis prove valuable and worth sustaining, the CSP might evolve into a separate entity, capable of seeking further funding, that would respond to the goals and interests of individual colleges and universities. Alternatively, it is conceivable that the NCAA or another organization interested in strengthening the relationship between athletics and educational values might be interested in assuming leadership. The future costs of maintaining the Center will depend on the frequency of data collection and analysis, and participants could eventually scale data collection and analysis back to an every-other-year cycle.

Technical Questions and Implementation (FAQ)

This section of the FAQ addresses additional questions that are technical in nature. Many of the responses have been framed by the CSP's Technical Advisory Committee (TAC).

18. *How is a cohort determined for the data collection?*

The initial cohort will consist of all full-time undergraduate students whose first matriculation at the CSP institution occurred after July 1, 2005 but no later than June 30, 2006. The second cohort will consist of similar students entering between July 1, 2006 and June 30, 2007, and so on for subsequent cohorts. Each cohort includes new students who entered in the fall, winter or spring, and transfer students who entered at any time during this period. Note that the dates used are the same as those used in the NCAA financial aid data collection project. The entering cohort being used by the NCAA and the CSP is not identical with the fall entering student cohort collected by IPEDS for Student Right-to-Know graduation rate reporting.

19. *What is the timetable for data collection?*

The CSP Center for Data Collection and Analysis mailed requests for new data on the 2006-07 cohort, and an update on the 2005-06 cohort, in November 2007. We ask for data submission by all participating institutions by December 31, 2007. We will provide a report to CSP Presidents in Spring, 2008. For future data submissions, we plan to institute an annual August – November data collection schedule.

20. *How will CSP institutional representatives know what data to assemble, how variables are defined, what codes to use, and what formatting is expected in the institutional data file they will submit?*

The CSP Center for Data Collection and Analysis will provide a detailed outline for data submission. Variables will be clearly defined and the desired codes and ranges will be specified. A sample data file will be available, and participants will send actual file submissions in delimited, plain text format. A macro will be available from the Center for Data Collection and Analysis for those wishing to export their data from Excel. Detailed instructions will also be included on the website used for uploading institutional data.

21. *What considerations influence the variable specification and the codes to be used?*

Some variables are unique to the CSP, but whenever possible we have used definitions and codes existing in other data collection projects. For example, a variable that specifies students' majors is coded according to Classification for

Instructional Programs (CIP) standard conventions (see <http://nces.ed.gov/pubs2002/cip2000/>); race/ethnicity is coded using Department of Education (DOE) standards.

22. *How was the data collection instrument developed and validated?*

An Excel spreadsheet template was initially developed and revised by the members of the CSP Technical Advisory Committee, with advice from other individuals associated with the CSP including Dr. Rachelle Brooks, Director of the Center for Data Collection and Analysis, and institutional research officers at several participating CSP institutions. Based on the experience with a pilot study carried out in the fall of 2006, further refinement of the instrument was made and current data standards are outlined in the Data Submission Guides available on the project website.

23. *How frequently and for how long will data be collected for a single cohort?*

Data for each cohort will be updated annually. Data collection on the cohort will continue for six years, unless all students have graduated or otherwise left the institution. When a student leaves college and does not return to that institution, the data collection from the initial institution ends for that student although the student remains a part of the cohort. The CSP has no plans at this time to survey former students, and it will not contact students in the future without the institutions' prior permission.

24. *How will the CSP ensure the security of all data, whether in its submission, storage, updating, or analysis?*

The CSP Data Security Task Force has assisted the Center for Data Collection and Analysis in technical aspects of addressing the need for high security of CSP data in its transmission, storage, retrieval, updating, and analysis; FAQ # 35 gives the membership of this group whose assistance has been invaluable. Please note that FAQ #13 summarizes background for the more technical discussion provided here.

The CSP has adopted the procedures and practices outlined below. Of course, changes in these processes, and in their technical details, resulting from new developments in technology may be made in the future to provide still further improvements in security.

a. File Transfer Process

The CSP Center for Data Collection and Analysis staff will work with participating colleges to coordinate data file submission scheduling. Each college will be given its own login to upload submissions to a secure file transfer server accessed through the Internet. The CSP selected MOVEit software because it enables highly secure data transfers while maximizing ease of use for the

institutions that are contributing data. The CSP CDCA's transfer server, located logically at the edge of the Internet, and physically in the ITCS secure Data Center facility, will utilize the MOVEit DMZ software package on a special-purpose Windows 2003 server, hardened using Windows and MOVEit tools. College staff will be able to use a browser to login and access a MOVEit client that will verify and upload file submissions through a 128-bit SSL encrypted HTTPS connection to the DMZ server. MOVEit also offers support for other encrypted transfer clients, such as SFTP. When files reach the DMZ server, MOVEit will store them in an AES256 strongly encrypted virtual file system. Submitted files will never exist on the DMZ file transfer server in unencrypted form, nor be recognizable as files. A separate MOVEit process on the CSP database server, behind additional firewalls in the ITCS secure Data Center facility, will transfer new file submissions, also using HTTPS, into the CSP database server.

b. Data Storage Security

The CSP database server is located behind additional firewalls in Northwestern's ITCS secure Data Center facility, and is protected from outside networks as well as from the secure DMZ file server. A MOVEit transfer client will be invoked from the CSP database server and used to contact the DMZ server to move files into the database server. This transfer client will move each file using HTTPS with SSL; it will decrypt the file and perform verification again to ensure the file is exactly what was submitted. An encrypted archive copy of the verified file will be created. An SQL*Loader program will use the verified file to load the file's enclosed cohort data into staging tables in a separate Oracle database schema used exclusively for storage, matching, and data-cleansing of personal identifying information. After their use, unencrypted copies of submitted files will be overwritten using a secure delete program, and the encrypted archive copies will be stored for each college.

c. PII Data Separation

The CSP CDCA staff will take special precautions to ensure the security of personally identifiable information (PII) -- student names, addresses, dates-of-birth, and institutional student IDs -- all of which will be stripped from the database schema that is used in CSP analyses. A PII storage and data-cleansing database schema, separate from the research and analysis schema, will be used to house PII data. This highly-restricted schema will be protected to allow access only by the CSP database administrator. As an additional layer of protection, all PII data appearing in tables of the PII database schema will be kept in Oracle-encrypted data fields in order to prevent their contents from being read by unauthorized staff, or their operating system data file representations from being exposed. Inside the restricted PII data schema, cohort data submissions will undergo a PII separation process using authorized stored procedures. The PII data will be read from the staging tables and placed along with CSP-assigned student identifiers ("project IDs") in master lookup tables. Different tables will be used to substitute the project IDs in place of the original PII data, along with the

corresponding remainders of the original less-sensitive cohort staging data.

d. Data Tabulation and Statistical Analysis

After the data cleansing, another stored procedure, authorized and controlled by the restricted PII database schema, will be used to copy the PII-stripped, project ID-substituted, data from the cleansed tables in the PII schema over to a set of tables with the same structure in the separate less-restricted research schema. Only the cleansed data in tables of the research and analysis database schema, with PII-stripped cohort data, will be made available for analytical extractions by authorized CSP research staff.

25. *What is the role of standardized test scores taken by students in high school?*

The CSP Center for Data Collection and Analysis will collect data on either SAT scores or ACT scores when available. Effective in 2005-2006 the SAT examinations have three parts and all three scores will be collected. The ACT now also has a writing component, which is optional; where possible we will collect data for it. The Center will also collect information on whether the submission of standardized test scores is a required part of the admissions process. The standardized test scores, like secondary school grades, are what the Center identifies as “Tier II” variables; their primary use is to help determine whether any differences in college academic outcomes for athletes are linked to differences in their entering qualifications. Test scores may help investigators identify and understand academic underperformance, if this becomes a consideration.

26. *Aren't measures of high school academic performance other than standardized test scores important?*

Yes, and the CSP Center for Data Collection and Analysis will also collect data on students' secondary school academic performance. Of course secondary schools differ in their quality, their student bodies, and their grading conventions. But other data collection projects have indicated that both test scores and secondary school grades are useful predictors of college academic performance.

27. *How will we determine whether an entering student was a recruited athlete?*

The answer is somewhat complicated by differences in the meaning of “recruited” across participating institutions. For this reason the CSP has identified two different ways of defining a recruited athlete. Each institution is asked to use just one of these definitions—the first one if it applies and the second one otherwise:

Recruited Admission Factor – An institution is classified as Recruited Admission Factor (RAF) if their coaches or athletic department staff identify students as prospective student-athletes to the admissions office prior to (or at) the time the admissions decision is made.

Recruited Coach Factor – An institution is classified as Recruited Coach Factor (RCF) if their coaches and athletic department staff make no contact with admissions representatives about specific students’ status as recruited athletes. Coaches may make contact with students directly and encourage them to apply and/or enroll and play on the team. This contact may occur before or after the admissions decision is made, but cannot influence the admissions decision in any way.

For RAF institutions, all students who are identified to the admissions staff by coaches as potential athletes should be classified as recruited. For RCF institutions, students with whom the coach communicates and encourages to enroll should be classified as recruited.

Further clarification, and examples for each recruitment factor, may be found on the project website in the Recruitment Factor Examples document.

Irrespective of which definition better applies to a particular institution, the determination should be made at the time of the admissions decision, and not at some later date. Note that at least a few students will be identified as recruited athletes even though they may not ever play a sport in college.

28. *Won’t it be difficult to get the data on the Recruited Coach Factor variable?*

It may be difficult for some institutions, but after the initial round of data collection it should become a more routine process. NCAA officials have advised that many institutions that do not use athletic talent as a selection factor in admissions are accustomed to using the stated definition of **Recruited Coach Factor**. For colleges without the **Recruited Admission Factor** variable, this alternative specification should prove useful.

29. *Won’t it be difficult to get the data on the likelihood of admission for recruited athletes at RAF institutions?*

It may be, but we encourage data submitters to consult with admissions staff about the likelihood of admission for their recruited student-athletes had they not been identified as such. We have included a “Don’t Know” option for use when the likelihood of admission cannot be estimated.

30. *In assessing college academic outcomes, what information will the CSP collect?*

Each year the Center for Data Collection and Analysis will ask for each student’s cumulative grade point average (GPA) and the scale used. The Center will convert the GPAs to percentile rank in the cohort. Thus if a group of women athletes at a college has a collective grade average that places it at the 52nd percentile, this means that 52 percent of the students in the entire cohort ranked below the average GPA for the specified group and 48 percent ranked above the average GPA. The use of percentile rank enables comparisons and pooling of data across CSP institutions, and it helps to take into account the different grading

standards used by institutions. Other outcomes will include choice of major and bachelor's degree attainment.

31. *What group comparisons will the CSP analyses make?*

The Center for Data Collection and Analysis will compare academic outcomes for recruited athletes, other intercollegiate athletes, and non-athletes both for men and for women. These comparisons will have interest at the level of individual institutions, the conferences, and for all participating institutions. The Center will also consider outcomes on a sport-by-sport basis, and here the aggregation of data across institutions or over multiple cohorts will be especially important for avoiding any inadvertent release of personally identifiable information.

32. *How does the Family Educational Rights and Privacy Act (FERPA) apply to this data collection effort?*

FERPA permits colleges and universities to disclose personally identifiable data about its students for specified research purposes. After legal analysis, the Mellon Foundation, in cooperation with CSP representatives at Middlebury College and Northwestern University has concluded that the proposed research is in compliance with a research exemption to FERPA non-disclosure requirements.

In addition, FERPA permits colleges and universities to disclose some personally identifiable data that is classified as "directory information" except when an individual student or his or her parents have filed a written request that his or her directory information not be disclosed. When linking student data with data from third party databases, the CSP will rely on this exemption. Therefore, the information shared with third parties will be limited to "directory information" as defined by participating colleges and universities, and records of students who have elected to withhold their directory information will not be disclosed. The CSP database will therefore flag the records of students who have chosen to opt out of the disclosure of their own directory information, and linkage to third-party databases will not be possible for these students.

Note: An additional discussion of certain relevant laws and regulations is included in the CSP Toolkit under the link "Selected Laws and Regulations Affecting the CSP Project."

33. *What is an institution's notification obligation to the students who are included in the CSP data base?*

Colleges and universities are not required to gain permission from students or their families to disclose data under the FERPA research exemption. However, CSP institutions are still legally obligated under FERPA to place notification of the CSP's access to student information in their student educational records. The required placement of notification can be in electronic form, and a one-time

notice is sufficient. The CSP Center will provide a template for the information that should be placed in student files; this template will be available in the CSP's Resource Toolkit on the CSP web site.

Under FERPA, colleges and universities may also disclose, without consent, "directory information". However, a school must inform parents and current students about what types of personally identifiable information it has designated as directory information and give parents and current students a reasonable amount of time to request that the institution not disclose directory information about them.

34. *What happens if a CSP institution and its Institutional Review Board (IRB) elect to pursue approval for participation in the CSP?*

IRB approval is required under federal law only for certain federally funded research projects. The CSP is not federally funded. However, as an added measure of data protection, Middlebury College and Northwestern University have sought the approval of their own IRBs for the CSP Representativeness Project. Depending on their local practices, some colleges or universities may still elect to consult their IRBs regarding this project. For example, some institutions may have adopted local policies that subject all projects relating to people or personal information to a review by their local IRBs. For those institutions that elect to gain approval by their own IRB, the CSP Resource Toolkit provides considerable background information and other support that may be useful in this process.

35. *What information from the CSP data analysis can eventually enter the public domain?*

Reports about the students at a particular institution will be provided directly and exclusively to that institution's president, leaving any sharing of those data within or outside the institution to the president's discretion. All reports that include aggregate data across institutions will be carefully scrutinized by the CSP Board of Advisors and the Mellon Foundation program officer responsible for the Middlebury grant or his designee, to ensure that no inadvertent release of data that identifies an individual institution occurs (as might be a worry in sports where only a few students participate). To protect the confidentiality of students, no item will appear in any report where the data might permit inferences on an individual student. Occasional reports from the CSP Center for Data Collection and Analysis about general findings and broad trends in the aggregate data may be publicly released, but only after a careful review by the CSP Board of Advisors and the Mellon Foundation program officer responsible for the Middlebury grant, or his designee.

36. *Who are the individuals responsible for the creation and development of the College Sports Project?*

The College Sports Project Coordinating Committee first explored possibilities for initiating such a project with Division III presidents, administrators, athletics directors, and others. The members of the CSP Coordinating Committee are: William D. Adams, President of Colby College; William G. Bowen, then President of the Mellon Foundation and President Emeritus, Princeton University; Amy Campbell, Special Assistant to the Vice President for Campus Life, Princeton University; John D. Emerson, Charles A Dana Professor of Mathematics and Dean of Planning at Middlebury College; Robert Malekoff, Assistant Professor of Sport Studies at Guilford College; Mary Patterson McPherson, Vice President of the Mellon Foundation; Michael S. McPherson, President of the Spencer Foundation; and Eugene M. Tobin, Program Officer for Liberal Arts Colleges and Director of the College Sports Project at the Mellon Foundation.

The members of the Board of Advisors of the CSP Center for Data Collection and Analysis are: John Emerson, Charles A. Dana Professor of Mathematics and Dean of Planning at Middlebury College; Pamela Gann, President of Claremont McKenna College; Charles Katsiaficas, Athletic Director at Pomona College; Jack Rossmann, Professor of Psychology at Macalester College; Oscar Page, President of Austin College; Samuel Schuman, former chancellor of the University of Minnesota-Morris; and Michael McPherson, President of the Spencer Foundation (Chair).

The members of the CSP Technical Advisory Committee are: Alan Caniglia, Senior Associate Dean of the Faculty, Vice Provost for Planning and Institutional Research, and Professor of Economics at Franklin and Marshal College; James C. Ferguson, Director of Institutional Planning and Analysis at Bates College; Eric Hartung, NCAA Associate Director of Research; Michael McPherson, President of The Spencer Foundation; Douglas T. Shapiro, Director of Research, The New School; and John Emerson, Dean of Planning and Charles A. Dana Professor of Mathematics at Middlebury College (Chair).

The members of the CSP Data Security Task Force are: Rob Loren, Database Developer at the CSP Center for Data Collection and Analysis (Convener of Task Force); Doug Falk, Chief Information Officer at the National Student Clearinghouse; Edward Freeland, Associate Director, Princeton University Survey Research Center; Ira Fuchs, Vice President for Research in Information Technology at The Andrew W. Mellon Foundation; David Kovarik, Director of Information and Systems Security/Compliance at Northwestern University; Mary C. Weisse, Manager of the MIT Data Warehouse at Massachusetts Institute of Technology; Rachelle Brooks, Director of the CSP Center for Data Collection and Analysis (ex officio); John Emerson, Middlebury College (ex officio).

37. Who should be contacted when institutional representatives have questions?

Please direct questions to the CSP Director of the Center for Data Collection and Analysis:

Dr. Rachelle Brooks
Director of the Center for Data Collection and Analysis
College Sports Project
Northwestern University
1801 Maple Avenue
5th Floor, Room #5310
Evanston, IL 60208-1103

VOICE: (847) 467-0352
FAX: (847) 467-0351
rlbrooks@northwestern.edu

9/13/06 awh
1/8/07 jde
2/6/07 jde
11/7/07 awh

November 22, 2004

TO: The Presidents and Chief Executive Officers of Division III

FROM: The College Sports Project Coordinating Committee

SUBJECT: Report and Invitation

Today, intercollegiate athletics plays a more prominent role at the colleges and universities in Division III than ever before in our history. In spite of differences of opinion reflecting the diverse missions and circumstances of more than 400 member institutions, there is widespread agreement that a well-administered intercollegiate program enhances the undergraduate experience, and that athletic competition provides valuable, life-long lessons for student athletes. The willingness to see athletes as students first remains Division III's defining educational philosophy. The question before us is how can we preserve and strengthen this core identity at a time when intercollegiate athletics, and sports in general, are rapidly moving toward increased specialization and intensification.

The College Sports Project's (CSP) creation in June 2003 was a response to some worrisome trends—the growth in season length, increased emphasis on nontraditional seasons, expanding numbers of contests, and the powerful allure of competing for national championships as the yardstick measuring success—all of which, we believe, threaten institutions' educational values.¹ We expressed concern that on some campuses the increasing intensification of the athletic “arms race” had contributed to a widening “academic-athletic divide” that separated student athletes from their classmates, and that distanced athletic administrators and coaches from faculty colleagues. Since it was unclear how widespread such concerns were across Division III, we initiated a yearlong cycle of conversations, and convened a series of small meetings and working groups to deepen our understanding of these issues across diverse institutions.²

¹ The College Sports Project's (CSP) creation paralleled the publication of William G. Bowen and Sarah A. Levin's *Reclaiming the Game: College Sports and Educational Values* (Princeton, NJ: Princeton University Press, 2003). Our initial focus drew heavily upon the data and experiences of the 33 selective institutions studied in *Reclaiming the Game*, as well as on the insights in James Shulman and William G. Bowen's earlier study, *The Game of Life: College Sports and Educational Values* (Princeton, NJ: Princeton University Press, 2001).

² In the fall of 2003, CSP hosted two meetings in Chicago and New York and approximately 35 presidents or their representatives participated. The invitation list drew on institutions represented in the Bowen books, and on expressions of interest from presidents interested in being part of a reform conversation. NCAA Division III Vice President Dan Dutcher attended both meetings and he continues to play an

November 22, 2004

-2-

In April 2004, following scores of conversations with presidents, provosts, athletic directors, coaches and faculty members, CSP hosted a meeting of 18 presidents whose institutions reflect the geographic and cultural diversity of Division III. We identified two critical objectives—ensuring the “representativeness” of all students (especially with respect to academic outcomes), and integrating coaches and athletic directors into the mainstream of campus life—that, if implemented and sustained, would reaffirm Division III’s core identity and commitment to educational values.

Two committees were constituted in each subject area: working groups (composed of presidents, athletic directors, chief academic officers, coaches and faculty members) that would study the issues and propose practical steps for moving forward, and presidential advisory groups that would respond to the ideas of the working groups and serve as sounding boards. The initial meetings of the representativeness and integration working groups took place in early summer 2004, when the two working groups held separate meetings aimed at program development. In late October each working and advisory group met to review a draft report and to make further recommendations.³

The report we share with you today embodies a collaborative effort on the part of more than 30 dedicated, conscientious, and generous colleagues whose opinions and views represent a broad range of Division III institutions. Their wisdom and insight inform the document, and their negotiating and leadership skills attest to their belief that achieving meaningful athletic reform is more important than an occasional difference of opinion. We share their conviction that this report represents more than a “one size fits all” approach, and that its recommendations have the potential of attracting substantial support across Division III, but there will have to be compromise and statesmanship along the way.

In reading the report, we ask that you take special note of the areas where future membership in CSP will require institutional action, such as data sharing and active engagement in integration activities.⁴ CSP representatives will be present at the NCAA

invaluable role as a liaison and resource for CSP to the NCAA Management and Presidents Councils. In an effort to broaden the scope of these conversations, the CSP subsequently sent a letter to 230 college and university presidents from the public and private sectors, inviting their interest in joining a reform conversation. The invitation list reflected earlier expressions of interest, presidential participation in the two fall 2003 meetings, representation on the Division III Management and Presidents Councils, and a roll call analysis of institutional votes on the reform proposals presented at the 2004 NCAA Convention. We received positive responses from approximately 130 presidents and set about the task of identifying singularly important issues of common interest that would cut across the diversity of the Division.

³ Members of the Integration and Representativeness working and advisory groups are identified in the report’s appendices.

⁴Our current thinking is that institutional members would be expected to share data on all students’ attainment levels at the time of admission and then again at the end of four years. No institutional

November 22, 2004

-3-

Convention in Dallas, and welcome the opportunity to speak with you, and with members of your conference during an open information session scheduled for Saturday, January 8, from 12 to 1 p.m.

In order to gauge the level of interest in moving forward, we ask that you fax the enclosed presidential response form to the CSP by December 20, 2004. If you have immediate comments or questions, please direct them to Eugene M. Tobin at The Andrew W. Mellon Foundation (emt@mellon.org; 212-838-8400).

We look forward to hearing from you.

The College Sports Project Coordinating Committee:

William D. Adams, William G. Bowen, Amy Campbell, John D. Emerson, Robert

Malekoff, Mary Patterson McPherson, Michael S. McPherson, and Eugene M. Tobin

information will be released by CSP without permission, and special care will be given to safeguard the confidentiality of each institution's data. On the integration side, members would be expected to:

- (1) conduct periodic self-studies followed by external consultation team visits; and
- (2) send groups of senior officers, athletic administrators, coaches, and faculty to integration institutes. These activities would be scheduled on a four-year staggered cycle, consistent with the expected duration of the student-athlete experience, so that an institution would be actively engaged in one or the other process every two years.



College Sports Project
 Northwestern University
 1801 Maple Ave, Suite 5310
 Evanston, IL 60201

Center for Data Collection and Analysis
 csp@northwestern.edu
 Phone: 847-467-0354
 Fax: 847-467-0351



Nomination of Official Institutional Contact Person for CSP Data Collection

Dear CSP Institution President:

Please identify the officer (and related department) at your institution who will serve as your primary contact person for the data collection and submission in the “representativeness” portion of the College Sports Project. The responsibilities of the person you identify will include:

- Serving as your institution’s liaison to the Center for Data Collection and Analysis, College Sports Project, at Northwestern University
- Coordinating the assembling of student record level data for submission to the Center for Data Collection and Analysis
- Responding to queries from the Center for Data Collection and Analysis about the data submitted

In most cases the designated CSP contact person will be the Director of Institutional Research (for institutions having an IR office) or the undergraduate registrar. However, we ask that you identify the individual of your choice.

Please note that all reports made by the Center pertaining to your institution will be sent only to you, and not to the office of the person responsible for responding to requests for data.

Name of Institution: _____

Name of CSP contact for data preparation and submission: _____

Title and address of contact person:

Contact’s e-mail address: _____

Contact’s telephone number: _____

Your name: _____

Signature: _____

Date: _____

Please mail or FAX (847-467-0351) this form as soon as possible to:

Dr. Rachele Brooks, Director of the Center for Data Collection and Analysis
 College Sports Project
 Northwestern University
 1801 Maple Avenue
 5th Floor, Room #5310
 Evanston, IL 60201-3140

For questions and concerns please contact Rachele Brooks at (847) 467-0352 or rlbrooks@northwestern.edu.



This application is to be submitted to and approved in writing by the IRB prior to the initiation of any investigation involving human subjects, data or material.

Part A: Information about you and your advisor (if you have one) as well as basic information about your project.

Original Submission [X] Proposal Modification [] Renewal [] (please note section 8)

Principal Investigator: Secretary of the College/Professor John Emerson
Title (if student, year of grad.) Name
Department/Program Old Chapel 106 Address or Box number
jemerson@middlebury.edu E-mail

Faculty Sponsor (if PI is a student) or Other Investigator(s): NA
Name
Department/Program Address or Box number E-mail

Project Title: College Sports Project: Northwestern Center for Data Collection and Analysis

Beginning Date: July 1, 2005 Ending Date: June 30, 2010

Approval Requested for: (maximum one year; must be renewed annually) from 1/15/06 to 1/15/07.

Is external funding being sought? [] No [X] Yes Potential Supporting Agency: The Andrew W. Mellon Foundation, support already received but the project implementation is now under development. Please provide a full copy of your grant proposal.

Statements of Assurance: I have read the Middlebury College Policy on Protection of Human Subjects and will comply with the informed consent requirement, I will inform the IRB if significant changes are made in the proposed study. And also, I certify that all of the information contained in this proposal is truthful.

Signature of PI Date: January 9, 2006; August 18, revised

I have reviewed this completed application and I am satisfied with the adequacy of the proposed research design and the measures proposed for the protection of human subjects. I am willing to accept responsibility for the archiving or destroying of the data collected during this research. And also, I certify that all of the information contained in this proposal is truthful.

Signature of Faculty Sponsor (if PI is student) Date

IRB USE ONLY Certification: Appended on File Needed
Date Received: Protocol No: Exempt Expedite Full Board
Please specify recommendations:
Signed:
Board members present:
Approval Date: Follow-up date: Approval is granted for:

Part B:

Subjects:

You may estimate the number of subjects you will use. ~400,000 student records

No. of males _____ No. of females _____ (a wild estimate)

Please check all that apply: 17 years of age or younger (note section 5b)

No data collected before subjects are age 18.

- cognitively impaired prisoners pregnant women
 elected/appointed officials or candidates for public office

Are you targeting other specific population(s)?
 X yes no

If yes, please describe the population(s):
College students, athletes and nonathletes

Nature of Study:

	<u>Yes</u>	<u>No</u>		<u>Yes</u>	<u>No</u>
anonymous ¹ data collection	<input type="checkbox"/>	X	observation/naturalistic study	<input type="checkbox"/>	X
confidential ² data collection	X	<input type="checkbox"/>	deception of subject	<input type="checkbox"/>	X
identifiers removed ³ after data collection	X	<input type="checkbox"/>	collection of bodily materials	<input type="checkbox"/>	X
collection of voice recordings	<input type="checkbox"/>	X	collection of external secretions	<input type="checkbox"/>	X
collection of photos/video recordings	<input type="checkbox"/>	X	collection of saliva/urine	<input type="checkbox"/>	X
collection of non-invasive physiological data	<input type="checkbox"/>	X	collection of blood samples	<input type="checkbox"/>	X
collection of deciduous teeth/dental plaque	<input type="checkbox"/>	X	collection of nail or hair clippings	<input type="checkbox"/>	X
use of physical sensors on or near the body	<input type="checkbox"/>	X	clinical drug research of any type	<input type="checkbox"/>	X
use of sensory acuity testing	<input type="checkbox"/>	X	exposure to x-rays/microwaves	<input type="checkbox"/>	X
weight measurements	<input type="checkbox"/>	X	use of non-FDA controlled devices	<input type="checkbox"/>	X

Will any of the data be collected or stored in a way which will allow anyone to identify individual subjects? Yes No

Could participation in this study create the potential risk of civil liability for the subjects? Yes No

Could participation in this study create the potential risk of criminal liability for the subjects? Yes No

Could participation in this study affect the financial standing of the subjects? Yes No

Could participation in this study affect the employability of the subjects? Yes No

Could participation in this study harm the reputation of the subjects? Yes No

Will the subjects be ingesting substances which are outside FDA food guidelines? Yes No

data collection of group behavior stressful non-stressful X n/a

data collection of individual behavior stressful non-stressful X n/a

Will personal (non-public) records be used? X yes no

If yes, type of records: health care educational drug, alcohol, psychiatric treatment⁴ other _____

Is exercise involved? yes no

If yes, level of exercise: extreme moderate mild

¹ there is never a time when the data can be connected to a participant

² measures to protect confidentiality

³ steps are taken to permanently strip identifiers from the data after it is collected

⁴ protected by Federal Privacy Act

Part C:

Please summarize in non-technical terms, as clearly and completely as possible your project.

1. **RESEARCH QUESTION.** Please give a brief summary of the research question you are investigating, in non-technical language.

Are college athletes at NCAA Division III institutions representative of their peer students with respect to entering characteristics and academic outcomes and related outcomes? Are colleges successful over time in narrowing any gaps between athletes and nonathletes?

- 2a. **SUBJECTS.** Describe your subject population in broad demographic terms.

All entering students at each participating college, followed until graduation or withdrawal

- 2b. If subjects are from specific populations, (e.g., children, pregnant women, prisoners, elected or appointed public officials, candidates for public office, or cognitively impaired) describe the special protections you will use.

Personally identifying information stripped from Northwestern database and stored in encrypted format behind a highly secure firewall in a logically separate area of the Northwestern server facilities. Social security numbers will NOT be collected. Public reporting of data only at a level aggregated across multiple institutions.

3. **PROCEDURES.**

- 3a. Briefly describe **how** you will recruit subjects. (e.g., Who will approach subjects? What is the source of the subjects?)

Subjects are all entering undergraduate students at participating institutions. Access to institutional student records data through Presidents with support of Institutional Research Offices and Registrar's Offices.

- 3b. Explain where the study will be conducted. Will permission be needed from cooperating institution(s)? *Append any letters exchanged with partner institution(s).*

Data collection and analysis located at Northwestern University. Approximately 137 colleges and universities participating as determined by their presidents.

- 3c. Describe what your subjects will be asked to do in your study. *Append copies of instructions, tests or questionnaires.* How many times will observations, tests, etc., be conducted? How long will their participation last?

See attached instrument for data collection. Instrument to be tested in pilot study and revised.

4. **RISKS.** Describe any immediate or long term risks to human subjects. Include risks of both a physical and psychosocial nature. Describe any potential legal, financial, social, or personal effects on subjects of accidental data disclosure.

Essentially no risks. If data were accidentally disclosed, student's academic records could be revealed. However, personally identifying information (PII) stored in separate location. The only use of PII would be for purposes of updating data and linking national data bases for addressing research questions.

- 4a. **CONFIDENTIALITY.** Confidentiality of information from or about subjects must be safeguarded. Even anonymous surveys conducted in a small community such as Middlebury College may contain combinations of demographic information that could lead to identification. Please state explicitly how you will safeguard these data.

Reporting of their own institution-specific data will be only to the President of each participating institution. Only data aggregated across institutions will be used in any public reports.

5. **CONSENT.**

5a. Informed consent is required by College policy. Consent is implied when anonymous data is collected; but a statement should appear on the questionnaire clearly stating that consent is given when the form is filled out and returned. Written consent is the default for all applications, however, the committee will consider alternatives.

I will obtain written consent. *Append a copy of your consent form.*

I have a strong case for obtaining oral consent. *State your case below and append a copy of the script you will use to obtain oral consent.*

Research is conducted under terms of a FERPA research exemption. All colleges will be required to place a notification of disclosure on students' educational records.

5b. Assent is also a very important component of human subjects research. If your subjects are unable to give legal consent themselves, if they're under 18 or mentally impaired, you are still obligated to obtain assent from them. Please take care to use words that your subject can understand. Oral assent is acceptable. *Append a copy of your assent script or form.*

6. BENEFITS OF RESEARCH.

6a. Describe the benefits of the research to the subjects. If subjects will be debriefed how will you ensure the educational value of the process?

No known impact of research on subjects.

6b. Describe the benefits of the research to the discipline, profession, or society.

Long-range goal of improved educational outcomes and enhanced integration of intercollegiate athletics within the academic mission of colleges and universities. It will help colleges ensure that all students are equally prepared for and benefiting from the educational programs the institution has to offer.

7. **CERTIFICATION.** It is important that you understand the history behind human subjects research oversight. You must complete some kind of human subjects training before this committee can allow you to do research on human subjects at Middlebury College, or under the auspices of Middlebury College. If you do not already have a certificate on file please append the certification page from the NIH website listed below or a comparable certificate from another course, e.g. the UVM online certification program or proof of having covered these topics in an applicable methods course. **Certification course completed on 1/7/06 and completion form obtained.**

8. **CONTINUING PROJECTS.** If you are renewing a project please append a status report of the project to date including:

- The number of subjects accrued.
- A summary of adverse events and any unanticipated problems involving risks to subjects or others and withdrawal of subjects from the research or complaints about the research since the last review.
- A summary of any relevant amendments or modifications to the research since the last review.
- A copy of the current informed consent document and any newly proposed consent document.

Print two copies of this form, sign and send to:

Eileen Fahey, IRB Coordinator

c/o Geology Department

276 Bicentennial Way

Middlebury College

Middlebury, VT 05753

phone (802) 443-5970

fax (802) 443-2072

(if you are faxing your request one copy will do)

Please append:

questionnaires, tests, discussion points,
consent forms or narratives,
assent forms or narratives (if needed),
grant application (if applicable),
- and your NIH certification form

<http://cme.nci.nih.gov/>

INCOMPLETE FILES CANNOT BE REVIEWED
AND YOUR PROJECT WILL BE DELAYED.

Confidentiality Agreement: For Illustrative Purposes Only

AGREEMENT made this first day of June 2005, by and among THE ANDREW W. MELLON FOUNDATION, THE PRESIDENT AND FELLOWS OF MIDDLEBURY COLLEGE (“Middlebury”), JOHN EMERSON and the other parties whose names appear on the signature page hereof (the “Agreement”);

Excerpts pertaining to confidentiality of data follow. A similar confidentiality agreement was executed between Northwestern University and The Andrew W. Mellon Foundation.

...

WHEREAS, John Emerson (the “Researcher”) of Middlebury has submitted a proposal to Eugene Tobin of The Andrew W. Mellon Foundation (the “Foundation”) on January 21, 2005 (the “Proposal”) to support the creation of a data collection and analysis center on college athletics at Northwestern University to encourage greater “representativeness” of athletes in terms of their academic performance, choice of majors, and opportunities for engagement in campus activities at interested colleges and universities in the National Collegiate Athletic Association’s Division III (the “Project”);

II. RESTRICTED INFORMATION & CONFIDENTIAL INFORMATION

1. For all purposes of this Agreement, the term “Restricted Information” shall mean all information in any format from the CSP Database provided to the Researcher and the Authorized Persons, and all information derived therefrom other than information which is publicly available through no breach of this Agreement.

2. For all purposes of this Agreement the term “Confidential Information” shall mean Restricted Information that discloses the identity of a particular person or institution, or that would be easily traceable to the identity of a particular person or institution. “Confidential Information” shall also mean Restricted Information about a group whenever the group contains so few persons or institutions that information about the group would disclose, or be easily traceable to a particular person or institution.

...

III. USE OF RESTRICTED INFORMATION

1. Restricted Information shall be used only by the Researcher and the Authorized Persons approved by the Foundation, and only for the purpose of conducting the Project set forth in the Proposal. If in the process of conducting research or otherwise, the Researcher (or the Authorized Persons) determines

that s/he would like to use the CSP Database for projects or purposes beyond the scope set forth in the Proposal, permission must be obtained from the Foundation.

...

IV. SECURITY OF RESTRICTED INFORMATION

1. All work on the Project involving Restricted Information shall be performed only at the facilities of Middlebury or Northwestern University in accordance with the terms set forth in Section V.4(c). The Researcher and the Authorized Persons shall not remove any hardcopy, tape, compact disk, diskette or other media containing Restricted Information from Middlebury or Northwestern University for any reason without the approval of the Foundation.

2. Middlebury, the Researcher and the Authorized Persons shall implement safeguards to prevent unauthorized access, by electronic or physical means, to Restricted Information. Restricted Information may be copied to and stored on a network server, a mainframe computer, or the storage device of a personal computer or other device, provided that it is protected by password or other secure method to prevent unauthorized access.

...

V. RELEASE OF RESTRICTED AND CONFIDENTIAL INFORMATION

1. Middlebury, the Researcher and the Authorized Persons shall not divulge, publish, release or otherwise disclose, orally or in writing, Restricted Information except in compliance with the review process forth below, as it may be updated from time to time by the Foundation in its sole discretion by written notice to Middlebury and the Researcher, or the exceptions which follow in Section V.4.

(a) *Reports containing Restricted Information to a School Participating in the Project that Relates Only to Such School:* The Researcher shall submit to the Chairman of the Project Advisory Board ("CSP Board") the template for the report, setting forth the nature of the information and analyses to be included (but including no Restricted Information). After receiving written approval of such template from the CSP Board, the Researcher may release the report to the President of such school or the person at such school that holds the equivalent position under a different title (i.e., Chancellor).

- (b) *Aggregated Data Reports to Schools Participating in the Project.* The Researcher shall submit to the Chairman of the CSP Board for prior approval the template for such reports. The Researcher shall submit to the Chairman of the CSP Board (or such other person(s) on the CSP Board who is not affiliated with a participating school if the Chairman is affiliated with a participating school) the actual reports to ensure that no Confidential Information is disclosed. After receiving the written approval of the Chairman (or such non-affiliated CSP Board person(s)), the Researcher may release to the participants of the Project, such aggregated data reports that do not disclose Confidential Information.
- (c) *Release to the General Public.* The Researcher shall submit to the Chairman of the CSP Board (or such other person(s) on the CSP Board who is not affiliated with a participating school if the Chairman is affiliated with a participating school) the report to ensure that no Confidential Information is disclosed. After receiving the written approval of the Chairman (or such non-affiliated CSP Board person(s)), the Researcher may release the report to the public provided that no Confidential Information is released.

2. Without limiting the generality of Paragraph 1 of this Section V, Middlebury, the Researcher and the Authorized Persons shall not (except as set forth in 1(a)) release individual or institution-specific data (such as geographical location, history, level of athletic competition, and selectivity) that could, in conjunction with publicly available data, result in the release of Confidential Information.

Explanation of FERPA Requirement

The Family Education Rights and Privacy Act (“FERPA”) expressly permits colleges and universities to release personally identifiable information in connection with certain studies for the purpose of developing, validating, or administering predictive tests, administering student aid programs, or improving instruction (20 U.S.C. §1232g(b)(1)(F)). FERPA requires any educational institution that discloses personally identifiable information from a particular student’s education record to maintain a record of the disclosure in that student’s education record for so long as that record is maintained. (34 C.F.R. §99.32(a)(1) and (2)). Attached is a sample disclosure statement that you may want to use in connection with your institution’s participation in the College Sports Project on representativeness.

DISCLOSURE NOTICE

[INSERT Name of college or university] participates in studies conducted for educational institutions that are designed to develop, validate, or administer predictive tests, administer student aid programs, or improve instruction. On [INSERT Date], [INSERT Name of university or college] disclosed personally-identifiable information from your education record to one or more of Northwestern University, Middlebury College, and The Andrew W. Mellon Foundation in conjunction with [INSERT Name of college or university]'s participation in the College Sports Project, a project that will analyze the experiences of student-athletes at Division III colleges and universities for the purpose of improving the educational experiences of students at the participating institutions. The study examines whether the student-athletes' experiences are similar to the experiences of other students at those institutions in terms of academic performance, fields of academic study, engagement in campus activities, and other measures of student life, in order to improve the educational experience of all students. Institutional student data will be submitted to and analyzed by Dr. Rachelle Brooks, the Director of the College Sports Project Center for Data Collection and Analysis at Northwestern University, and her staff. Professor John Emerson at Middlebury College is the Principal Investigator for the project and has oversight for reporting aggregated summary results from the research carried out at Northwestern University. The Andrew W. Mellon Foundation is funding the CSP Project and is the owner of the CSP database.

Some personal identifying information, such as student names, addresses, and date of birth may be released on a temporary basis to the College Board, ACT Inc., the Cooperative Institutional Research Program, and similar third parties in order to collect additional information about students for the purpose of improving instruction on college and university campuses. This identifying information from student records will be released by the Center for Data Collection and Analysis only when it is defined as directory information by the participating institution, and when the student or the student's family has not opted out of releasing directory information.

Any researcher (whether or not specifically identified above) or other recipient of any College Sports Project data or information that is personally-identifiable to you is instructed that the information must be kept in confidence and may not be disclosed except as permitted or required by law.

2/06/07

Selected Laws and Regulations Affecting the CSP Project

Some colleges and universities have asked the CSP Center for Data Collection and Analysis (the “CSP Data Center”) for additional information about laws relating to the CSP data collection effort. The following discussion is based on advice provided by outside counsel to the Mellon Foundation and shared with the CSP Data Center. While neither Mellon Foundation nor the CSP Data Center can provide legal advice, the CSP Data Center is providing this discussion as background information that colleges and universities can use in making their own analyses of these issues.

(1) Question: *Does the Family Educational Rights and Privacy Act (FERPA) allow institutions of higher education to share data with researchers without obtaining prior consent from students?*

Answer: Yes, FERPA explicitly allows institutions to do so for studies for, or on behalf of, their institutions that are related to the improvement of instruction. The CSP study on representativeness is aimed at improving the educational and instructional experience of all students on participating campuses. In addition, FERPA permits colleges and universities to disclose some personally identifiable data that is classified as "directory information" except when an individual student or his or her parents have filed a written request that his or her directory information not be disclosed. When linking student data with data from third party databases, the CSP will rely on this exemption. The CSP database will therefore flag the records of students who have chosen to opt out of the disclosure of their own directory information, and linkage to third-party databases will not be possible for these students.

34 C.F.R. § 99.31(a) (6) (i)-(iv) of FERPA describes the conditions under which researchers may conduct studies without the requirement of a signed prior consent from students whose records are accessed. The CSP Data Center is committed to abiding by these conditions.

Sec. 99.31. Under what conditions is prior consent not required to disclose information?

(a) An educational agency or institution may disclose personally identifiable information from an education record of a student without the consent required by Sec. 99.30 if the disclosure meets one or more of the following conditions:

. . .

(6)(i) The disclosure is to organizations conducting studies for, or on behalf of, educational agencies or institutions to:

- (A) Develop, validate, or administer predictive tests;
- (B) Administer student aid programs; or
- (C) Improve instruction.

(ii) The agency or institution may disclose information under paragraph (a)(6)(i) of this section only if:

- (A) The study is conducted in a manner that does not permit personal identification of parents and students by individuals other than representatives of the organization; and

(B) The information is destroyed when no longer needed for the purposes for which the study was conducted.

(iii) If this Office [of Family Policy Compliance] determines that a third party outside the educational agency or institution to whom information is disclosed under this paragraph (a)(6) violates paragraph (a)(6)(ii)(B) of this section, the educational agency or institution may not allow that third party access to personally identifiable information from education records for at least five years.

(iv) For the purposes of paragraph (a) (6) of this section, the term *organization* includes, but is not limited to, Federal, State, and local agencies, and independent organizations.

For additional information on the study exemption, see also 34 C.F.R. § 99.32 (required disclosure in student's educational record); § 99.33 (re-disclosures).

Under 34. CFR § 3, "Directory information" is defined as "information contained in an education record of a student that would not generally be considered harmful or an invasion of privacy if disclosed. It includes, but is not limited to, the student's name, address, telephone listing, electronic mail address, photograph, date and place of birth, major field of study, dates of attendance, grade level, enrollment status (*e.g.*, undergraduate or graduate; full-time or part-time), participation in officially recognized activities and sports, weight and height of members of athletic teams, degrees, honors and awards received, and the most recent educational agency or institution attended."

34 C.F.R. § 99.37 of FERPA describes the conditions under which disclosure of directory information is permitted. For linking with third-party databases, the CSP will only collect and disclose directory information.

§ 99.37 What conditions apply to disclosing directory information?

(a) An educational agency or institution may disclose directory information if it has given public notice to parents of students in attendance and eligible students in attendance at the agency or institution of:

(1) The types of personally identifiable information that the agency or institution has designated as directory information;

(2) A parent's or eligible student's right to refuse to let the agency or institution designate any or all of those types of information about the student designated as directory information; and

(3) The period of time within which a parent or eligible student has to notify the agency or institution in writing that he or she does not want any or all of those types of information about the student designated as directory information.

(b) An educational agency or institution may disclose directory information about former students without meeting the conditions in paragraph (a) of this section.

(2) Question: *Should participating institutions submit the CSP Representativeness project to their Institutional Review Boards?*

Answer: *Under the Common Rule, IRB approval is only required when federal money from specified government agencies supports the study. Although the CSP project is not federally funded, the answer depends on local practice and whether an institution has elected to subject non-federally funded research to the Common Rule.*

Middlebury College, the organization running the CSP Representativeness project, has applied for and received approval from its IRB. Northwestern University, as the institution responsible for the collection and analysis of the data, has submitted an application to its IRB.

The concept of IRBs and human subject research is set out in the so-called “Common Rule” issued by the federal Department of Health and Human Services for research funded by HHS and other agencies (including the Department of Education). The Common Rule is found at 45 C.F.R. §§ 46.101 et seq. Under the Common Rule, IRB approval is only required when federal money from specified government agencies supports the study. The CSP study is receiving NO government funding.

Nevertheless, many schools have chosen to broaden their IRB procedures to include any human subjects research, however funded. The Common Rule requires recipients of federal funds for human-subjects research to describe the protections they provide for human-subjects research that is not supported by federal money (45 C.F.R. § 46.103(b)(1)). (The form that institutions use to submit their “Federal-Wide Assurance” [FWA] that they have procedures for human-subjects research supported by federal funds that comply with the requirements of the Common Rule is located at <http://www.hhs.gov/ohrp/humansubjects/assurance/filasur.htm>.) Institutions that agree to have the Common Rule apply to all their human-subjects research, federal or not, do not have to come up with a separate set of principles for their nonfederal research. But institutions certainly do have the option not to extend the IRB process to their other human-subjects research when they complete the FWA form, and each time it is renewed.

NCAA Sport Codes

MAR	Men's Archery
MBA	Baseball
MBB	Men's Basketball
MBM	Men's Badminton
MBO	Men's Bowling
MCC	Men's Cross Country
MCH	Men's Cheerleading
MCK	Men's Cricket
MCR	Men's Crew
MEQ	Men's Equestrian
MFB	Football
MFE	Men's Fencing
MGO	Men's Golf
MGY	Men's Gymnastics
MHB	Men's Handball
MIH	Men's Ice Hockey
MJU	Men's Judo
MLA	Men's Lacrosse
MLC	Men's Lightweight Crew
MLF	Men's Lightweight Football
MPO	Men's Polo
MPS	Men's Pistol
MRD	Men's Rodeo
MRI	Men's Rifle
MRU	Men's Rugby
MSK	Men's Skiing
MSL	Men's Sailing
MSO	Men's Soccer
MSP	Men's Slow Pitch Softball
MSQ	Men's Squash
MSW	Men's Swimming
MTE	Men's Tennis
MTI	Men's Track, Indoor
MTO	Men's Track, Outdoor
MTR	Men's Triathlon
MVB	Men's Volleyball
MWP	Men's Water Polo
MWR	Men's Wrestling
MWS	Men's Water Skiing
WAR	Women's Archery
WBB	Women's Basketball
WBD	Women's Badminton
WBW	Women's Bowling
WCC	Women's Cross Country
WCH	Women's Cheerleading
WCK	Women's Cricket
WCR	Women's Rowing
WEQ	Women's Equestrian
WFE	Women's Fencing
WFH	Field Hockey

WGO	Women's Golf
WGY	Women's Gymnastics
WIH	Women's Ice Hockey
WJU	Women's Judo
WLA	Women's Lacrosse
WPO	Women's Polo
WPS	Women's Pistol
WRI	Women's Rifle
WRU	Women's Rugby
WSB	Softball
WSK	Women's Skiing
WSL	Women's Sailing
WSO	Women's Soccer
WSP	Women's Slow Pitch Softball
WSQ	Women's Squash
WSS	Women's Synchronized Swimming
WSW	Women's Swimming
WTE	Women's Tennis
WTH	Women's Team Handball
WTI	Women's Track, Indoor
WTO	Women's Track, Outdoor
WVB	Women's Volleyball
WWP	Women's Water Polo
WWR	Women's Wrestling
WWS	Women's Water Skiing
XAR	Mixed Archery
XBM	Mixed Badminton
XBO	Mixed Bowling
XCC	Mixed Cross Country
XCH	Mixed Cheerleading
XCK	Mixed Cricket
XCR	Mixed Crew
XEQ	Mixed Equestrian
XFE	Mixed Fencing
XGO	Mixed Golf
XGY	Mixed Gymnastics
XHB	Mixed Handball
XJU	Mixed Judo
XPO	Mixed Polo
XPS	Mixed Pistol
XRI	Mixed Rifle
XSK	Mixed Skiing
XSL	Mixed Sailing
XSP	Mixed Slow Pitch Softball
XSQ	Mixed Squash
XSW	Mixed Swimming
XTE	Mixed Tennis
XTI	Mixed Track, Indoor
XTO	Mixed Track, Outdoor
XWR	Mixed Wrestling
XWS	Mixed Water Skiing