Access to and use of Learning Data for evaluation and enhancement purposes

Prepared by Simon Bates & Marianne Schroeder, CTLT, for Learning Data Committee, June 2018

Background context

There is no formal process to support and oversee requests to access and use learning data for purposes of evaluation and quality assurance / enhancement. In the light of an anticipated increase in such requests as the Learning Analytics project develops, this paper sets out that proposed approach, detailing the scope, high-level process and information requirements.

The approach has been developed following recent discussion at the Associate Deans Academic meeting and Committee of Deans meeting in Vancouver. Following consultation and refinement, the proposed process will be taken back to these groups for endorsement, resourcing discussion and soft-launch implementation by the start of the 2018-19 academic session.

The proposal formulates a necessary and important oversight process that complements the work of the following groups:

- The Learning Data Committee (which has recently developed a statement of *Purpose and Principles* to guide Learning Analytics work).
- The Research Ethics Committee (which oversees the BREB process for research activities involving human subjects).
- The Data Governance Committee (which has responsibility for the strategic guidance of data governance and use at UBC).

Scope

Access to and use of data collected through online application whilst students are undertaking course activities provides opportunities for interventions and improvement and is a normal part of course and curriculum enhancement activities. The proposed process is not intended to be applicable to data and undertaking analyses that are routinely available to faculty and other teaching team members as part of the functionality of the LMS (or other learning tools). An example would be a faculty member choosing to undertake a review and analysis of submitted assessments within the LMS, with a view to contacting students who have missed a number of key submissions. Rather, we see this proposed process as necessary when one or more of the following criteria are met:

- Access to data is provisioned beyond the core teaching team;
- Access to data from multiple courses is requested and will be combined;

- Learning data will be combined with personal information, e.g., from the SIS.

The process described below will be applied to all new requests for access to data, as well as to audit existing access provisions to data.

High-level Process description (for discussion)

1. Requests for access to and use of learning data will require completion of an application form (suggested format in the following section). The form will be completed online.

2. Requests may be considered in responsive mode, i.e. submissions may be made electronically, rather than at fixed proposal submission times.

3. Applications will be triaged to determine whether or not they can be classified as 'low risk' analyses (specific criteria to be determined), where
   - 'low risk' analyses may be fast-track approved by a single individual with an appropriate level of responsibility.
   - all other analyses will be sent for review, within a defined timeframe (e.g. 2 weeks).

   For purposes of collaboration, all applications will be seen by the committee during the implementation phase, regardless of whether they have been classified as low risk.

4. A standing sub-committee of the current Learning Data Committee (approx. 5-6 members, with membership TBD) will oversee review of applications in a timely manner, conducting as much of its activity as possible electronically.

5. The sub-committee will report semi-annually to the Learning Data Committee on any proposed modifications to review arrangements as they become established and will produce a formal report of requests submitted and the outcomes.

6. Administrative and technical support for the work of this committee will be provided via appropriate staff in CTLT.

Access to and Use of Learning Data for Quality Assurance / Enhancement Purposes – application form

If you are unsure whether the project you are planning is Quality Assurance or Research (requiring formal Behavioural Ethics oversight), please refer to the checklist available on the website:
https://ethics.research.ubc.ca/sites/ore.ubc.ca/files/documents/BREB_ChecklistForResearchRequiringEthicsReview.pdf

1. **TEAM**
   1.1. Academic Oversight
   The individual with an academic appointment who is taking responsibility for this QA activity.
   Name /Primary Appointment / Rank / Email

   1.2. Primary Contact
   Provide the name of ONE primary contact person in addition to the Academic Lead (normally Head or Dean) who will receive ALL correspondence for this study. This person will have access to read, amend and track the application.
   Name / Primary Appointment / Rank / Email

   1.3. QA Team Members
   Please list additional team members and their roles:

Last Name	First Name	Department	Rank / Role

2. **PROJECT DATES & FUNDING**
   2.1. Project Period
   Please choose one of the following:
          Plan to request and analyze the data immediately after obtaining approval; OR
          Plan to request and analyze the data at a later date.
          Estimated start / end dates: _____

   2.2. Source of Funds
   Please select applicable box(es) to indicate the type of funding you are receiving:
          No funding
          SoTL Seed Fund
          TLEF or ALT
          Other (internal / external, please specify): _____

2.3. Connection to Other Applications

If this project is related to any other REB or QA applications, please identify them here:

2.4. Conflict of Interest / Commitment

Conflicts of Interest / Commitment (see UBC Policy 97) can arise naturally from a Team Member's engagement inside and outside the University, and real or perceived Conflicts do not necessarily imply any wrongdoing. However, they must be recognized, disclosed and assessed.

Does any member of the Project Team have any personal interest(s) that could compromise or reasonably be perceived to compromise the objective completion of these analyses? Personal interests may include business, commercial or financial, as well as personal matters and career interests.

     No

     Yes (please explain):

3. **PROJECT DESCRIPTION**

3.1. Project Summary

Please provide a short summary of the project in non-technical language. What are you trying to learn? Why is this project considered quality assurance?

3.2. Peer Consultation

Please list the names and contact information for peers, colleagues and/or experts you have consulted about this project:

Name	Role	Email address

3.3. Inclusion Criteria
List the courses, sections and/or programs which will be included in this project. Describe the criteria for inclusion.

Program	Course	Section	Years of Study

3.4. Exclusion Criteria
Describe the student types, courses, sections and/or programs to be excluded from this project, and describe the criteria for exclusion. Please note that exclusion of individuals on the basis of attributes protected under the BC Human Rights Code requires justification.

3.5. Outcomes of Analyses
Describe the potential actions that you hope may result from the outcomes of the analysis. Describe the potential benefit to students, the Course, Department and/or Faculty, as well as to the University.
What risks do you foresee?

3.6. Communication
How, when and to whom do you intend to communicate the findings of the analysis?

4. **DATA SECURITY & CONFIDENTIALITY**
   4.1. Personally Identifiable Information
   Are personal identifiers (e.g. student IDs) required as part of this project?
   - No
   - Yes. If yes, please explain why.

4.2. Notification

4.2.1. Instructors

Please describe how you will notify instructors involved in teaching the courses mentioned above. If you do not intend to provide notice, justification is required.

4.2.2. Students

Explain how you will notify students, including any provision for opting out of the proposed analysis.

4.3. Data elements required

Please describe the data elements and structure required. If the data will be combined with other data, please describe in detail.

4.4. Access to data

Who will have access to the data? Will all members of the project team have access to the all elements? Are confidentiality agreements in place? Please describe in detail.

4.5. Retention and Destruction of Data
How long does the data need to be retained? Please note that at the end of the QA project, we expect that the data is erased using FIPPA or HIPPA compliant software (e.g., ERASER).

4.6.   Data Storage and Security
How will the data be stored? How will security of the data be maintained?