

Guidance for Conducting Research in Educational Settings or with School Children

When conducting research in academic settings (K-12 schools, colleges, and Universities) there are a number of concerns to keep in mind. In order to access and use information from student records for research purposes, researchers must ensure that they are compliant with Family Educational Rights and Privacy Act (FERPA), Protection of Pupil Rights Amendment (PPRA), and No Child Left Behind (NCLB). When conducting research in schools that are part of the Chicago Public School (CPS) system, researchers must be familiar with the requirements of the CPS Research Review Board (RRB) and the need for this additional review process. This guidance document outlines information about FERPA, NCLB, and PPRA, and CPS research policy that may be helpful to DePaul researchers.

FERPA, NCLB, and PPRA

There are federal laws that apply to research conducted with students.

1. The Family Educational Rights and Privacy Act (FERPA) gives the parent of the student, or the students themselves (if the student has reached the age of 18 or is attending any school beyond high school), rights regarding the student's educational records. In general, the schools must have written permission from the parent or student before releasing any identifiable information from a student's record. For additional information about FERPA refer to: <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>
2. The Protection of Pupil Rights Amendment (PPRA), an amendment to No Child Left Behind (NCLB), is a law that provides protection of the rights of students and parents. PPRA expanded upon the rights originally provided to parents and students in NCLB. PPRA covers items like instructional materials, surveys, analysis, and evaluation of minor students. There are different requirements for PPRA based upon whether the research program is being conducted under the U.S. Department of Education or whether surveys are conducted in schools receiving funds from the Department of Education. For additional information about PPRA refer to: <http://www.ed.gov/policy/gen/guid/fpco/ppra/index.html>. PPRA provides the following rights to parents and students:
 - a. It indicates that schools must notify parents of their rights to inspect student surveys and make these materials available to the parents to review.
 - b. If the research is funded by the U.S. Department of Education, the researcher must obtain written parental permission before minor students are allowed to participate in any survey, analysis, or evaluation that reveals information concerning one of the following seven topic areas:

1. Political affiliations or beliefs of the student or the student's parent
2. Mental and psychological problems potentially embarrassing to the student and his/her family
3. Sex behavior or attitudes
4. Illegal, anti-social, self-incriminating and demeaning behavior
5. Critical appraisals of other individuals with whom the participants have close family relationships
6. Legally recognized privileged or analogous relationships, such as those of lawyers, physicians, and ministers
7. Income (other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program).

Revisions to NCLB added an eighth research topic area for which a researcher must obtain written parental permission.

8. Religious practices, affiliations, or beliefs of students or their parents.
- c. For surveys conducted at schools receiving any funding from the U.S. Department of Education, the NCLB Act of 2001 gave parents of students additional rights related to surveys administered in public schools, not just those surveys administered and funded directly through a Department of Education program. Therefore, every public school system that accepts money from the Department of education (all public elementary and secondary schools) must develop a policy that informs parents of their rights to inspect third party surveys and related instructional materials and the right to ask that their child not participate.
- d. The IRB does not have the authority to overrule or waiver any of the provisions of PPRA or district policies for implementing these provisions. So, if your research meets the criteria for an exemption, although written parental permission and signature are not required, it may be necessary to provide information to parents in the way of a flyer or letter offering the opportunity to review the study materials and to ask that their child not participate in the research.

For additional information about DePaul's FERPA policy, which may impact research conducted with DePaul students, review the DePaul policy available on the policy page: <http://policies.depaul.edu/policy/policy.aspx?pid=281>

Research Conducted in Chicago Public Schools

As many of the research protocols submitted to the DePaul IRB are conducted in the Chicago Public School (CPS) system, it is important for the researcher planning this type of research to be aware of CPS-specific policies and requirements for conducting research in their schools.

The two over-arching principles that CPS wishes researchers to keep in mind at all times are preventing disruption to the educational process and protecting the privacy of CPS students and staff in compliance with the Board Policy on Parent and Student Rights of Access to and the Confidentiality of Student Records, FERPA, and the Illinois School Student Records Act. Furthermore, CPS research must have demonstrable educational value and be based in sound research methodology.

The CPS has a review board called the Research Review Board (RRB) that must review all research conducted in CPS schools. The main web-page for the RRB is located at: <http://www.cps.edu/Research/Pages/Research.aspx>. The guidelines for conducting research in CPS schools can be located on this site or through the direct link at: http://www.cps.edu/Research/Documents/RRB_Guidelines_Complete_052412.pdf.

The RRB review process for research requires the submission of a “Research Review Board Application.” This form can be found at: <http://www.cps.edu/Research/Documents/RRBapplication.pdf>

All requests to conduct research within the Chicago Public Schools must be submitted online and in print in order to be reviewed by the RRB. The elements of a full submission are outlined in the CPS guidelines. The CPS suggests submission to the RRB 60 days before the intended started date of the research. The CPS guidance document available on their website includes deadline dates for each RRB meeting.

CPS requires that local IRB approval be obtained before submitting your research to the CPS RRB for full review. The entire review process including DePaul University LRB and IRB review can involve up to 2 months. Given the need to submit proposals to the CPS RRB 60 days before the research start date, it may be necessary to plan on beginning the DePaul review process approximately 4 months before you plan to begin your research.

Researchers are advised that approval of a research proposal by the DePaul IRB does not guarantee approval by the RRB. Also note that the RRB may withdraw its approval of a research proposal at any time and for any reason or it may place additional conditions on external researchers. Rejected proposals cannot be resubmitted for two (2) review cycles. Rejected proposals are considered as having serious issues that likely cannot be addressed with a resubmitted proposal.

If the research is still being conducted after the end of the one-year approval date, then an extension of approval must be submitted to CPS using the Modified & Continuing Review Checklist on the CPS web site (<http://www.cps.edu/Research/Documents/RRBmodification.pdf>).

The following are some additional tips for conducting research in CPS schools. Full details can be found in the CPS guidelines.

1. Charter and Contract School staff are not considered CPS employees, so research on these staff members would not require adherence to CPS policies related to

- employees. However, students of these schools are considered CPS students and therefore all research conducted with the students must follow the CPS guidelines.
2. Research must pose minimal interference to school instruction and operations as well as to relationships between students, parents and school and district staff.
 3. External researchers may not begin any research activities or obtain data for research purposes without first following the procedures in the CPS policy and securing the necessary approvals.
 4. No CPS staff time or resources (such as email or internal mail) should be used to solicit participation in a research study. Permission to use the CPS school building for data collection must be provided by the school principal in charge of that building.
 5. CPS cannot be used to recruit participants for research and staff may not be used to collect data.
 6. Compensation for participation in the research may be provided to students. However, CPS staff may not receive compensation if they participated in the research during working hours. CPS staff participating in research activities outside of work may receive a maximum compensation of \$50.
 7. Researchers may not request data directly from schools or departments. All requests for data must be submitted to the CPS Office of Research, Evaluation and Accountability (REA). Researchers may not receive personally-identifiable student data unless they provide written consent for the release from the parent or student.
 8. If research is being conducted by a CPS employee, data collection cannot occur in the same school in which the employee has authority and the participants must not be known to the researcher. For example, principals cannot collect data from staff in their own schools, and teachers cannot collect data from current or former students.
 9. A written letter of support must be obtained from the appropriate central office administrator (the office most closely related to the topic area being researched).

For example:

Study Title - Learning Math & Spatial Skills
Letter of Support - Office of Mathematics & Science

Study Title - Supplemental Educational Services in CPS
Letter of Support - Office of Extended Learning Opportunities

The CPS web site includes a list of Departments. If you are unsure of which CPS department applies to your research, you should contact the Research Review Board: Phone: (773) 553-2430, email: research@cps.k12.il.us. CPS highly recommends initiating discussions with the appropriate department to discuss the research design and any issues they may see with the research before obtaining IRB approval and submitting to the CPS RRB

10. The Principals of schools affected must be provided with a copy of the RRB's approval letter. RRB approval is conditional and subject to further review by the school principal(s) and research subject(s). Access may be restricted to minimize disruption of school activities.

11. There are numerous consent requirements specific to CPS. Researchers should review the current CPS guidelines before preparing the consent/parental permission/assent documents to ensure that all current requirements are met. To aid in preparing a CPS compliant document, use the DePaul University CPS template. The following are some of the required CPS elements:
- There must be space and lines for the students name and the parent/guardian signature. Before the signature line there must be check boxes indicating the following language (modified appropriately for consent, assent, and parental permission), “Yes I agree to have my child participate” or “No, I do not give consent for my child to participate.” Please note, active consent (i.e., signature approving participation) is required.
 - If the consent is longer than one page, a summary of what participants will be asked to do and/or the type of data requested from CPS must be located immediately above the signature lines.
 - To comply with PPRA the parent/guardian permission document must include the following text: “Parents please be aware that under the Protection of Pupil Rights Act. 20 U.S.C. Section 1232 (c)(1)(A), you have the right to review a copy of the questions asked or of materials that will be used with your students. If you would like to do so, you should contact [insert appropriate contact] at (XXX) XXX-XXXX to obtain a copy of the questions or materials.” In addition, the researcher must have a plan in the protocol to provide the parent/guardians access to the surveys or materials that does not utilize CPS staff or resources.
 - The consent must contain a description of any individually-identifiable student data that the researcher will access or request for the research and how the data will be destroyed. There must also be a separate yes/no check box in the consent referring to the release of student level data.
 - In addition to parental consent, CPS requires that students who are age 12 (6th grade) or older assent to their participation in the research in which they are being asked to be a subject. Please note that under DePaul policy, the age of assent is seven years old.
12. If the researcher wishes to modify the scope, methods or research activities (including surveys, instruments or consent documents), they must obtain prior written approval from the RRB.
11. Upon completion of the research study, the researcher must send a letter to the RRB notifying them of the completion of the study. A copy of the final report or summary of results must be provided to the RRB, the principal of the school studied, and the CPS central office that provided the letter of support. These reports must be emailed in PDF format to research@cps.k12.il.us or submitted by mail to the CPS Research Review Board.

In order to offset the costs that are connected to devoting staff time to research proposals and data requests, CPS charges fees to researchers related to these actions. The fee structure is as follows:

Research Proposal: CPS charges a one-time \$50 processing fee for each research proposal submission.

Data Requests: CPS charges a \$50 processing fee for each data request. Additionally, after a data request has been made, a staff member will contact the requestor to generate an estimate of the number of staff hours required to fill the request. Staff time is billed at \$70 per hour. The timeframe for a data request is generally four to six weeks, depending on the current workload of CPS staff. It may be possible for a researcher to make an expedited data request (2 week average turnaround time). The fee for such a request is \$105 per hour.

CPS does make certain aggregate data available to the public on its website. That information can be found on the following page: <http://cps.edu/SchoolData/Pages/SchoolData.aspx>