RESEARCH AND PROGRAM EVALUATION STUDIES

I. INTRODUCTION

PURPOSE: RESEARCH-BASED EVIDENCE BEING NECESSARY FOR SOUND DECISION-MAKING, THE SCHOOL BOARD SUPPORTS EDUCATION RESEARCH AND PROGRAM EVALUATION STUDIES THAT APPLY RIGOROUS AND SYSTEMATIC PROCEDURES TO OBTAIN VALID DATA RELEVANT TO THE IMPLEMENTATION AND EFFECT OF EDUCATION PROGRAMS AND THEREBY TO ADVANCE PUBLIC EDUCATION FOR DISTRICT STAKEHOLDERS. HOWEVER, RESEARCH ACTIVITIES AND DOCUMENTS WILL ONLY BE APPROVED WITH CONSENT OF THE SUPERINTENDENT VIA THIS POLICY, WHICH ESTABLISHES THE REQUIREMENTS FOR REQUESTING AUTHORIZATION TO CONDUCT RESEARCH IN DISTRICT SCHOOLS AND/OR TO RECEIVE DATA FROM THE DISTRICT FOR RESEARCH PURPOSES.

APPLICABILITY: THIS POLICY APPLIES TO UNIVERSITIES, ORGANIZATIONS, INDEPENDENT CONSULTANTS CONTRACTED BY THE SCHOOL BOARD, AND OTHER RESEARCHERS INTERESTED IN CONDUCTING K-12 EDUCATION RESEARCH AND/OR PROGRAM EVALUATION ACTIVITIES IN DISTRICT SCHOOLS OR WHO SEEK TO USE DATA FROM DISTRICT SCHOOLS FOR RESEARCH THAT IS DESIGNED TO CONTRIBUTE TO IMPROVING STUDENT OUTCOMES AND EDUCATION EFFECTIVENESS. THIS POLICY DOES NOT APPLY TO PUBLIC RECORDS REQUESTS MADE UNDER CHAPTER 119, FLORIDA STATUTES.

PROPOSED RESEARCH OR PROGRAM EVALUATION STUDIES MAY INCLUDE SURVEYS, ASSESSMENTS, INTERVIEWS, CLASSROOM OBSERVATIONS, INTERVENTIONS, OR ANY PROCEDURES DESIGNED TO COLLECT DATA THAT ALTER THE NORMAL EDUCATIONAL ACTIVITIES OF STUDENTS, STAFF, OR SCHOOL OPERATIONS.

ALL RESEARCH AND PROGRAM EVALUATION STUDIES MUST BE APPROVED BY THE DISTRICT'S COMPREHENSIVE INSTITUTIONAL REVIEW BOARD (IRB) AND RESEARCH REVIEW PROCESS, WHICH ENSURES:

- PROTECTION OF DISTRICT STUDENTS, PARENTS, AND STAFF BY COMPLYING WITH THE CODE OF ETHICS [APPROVED FEBRUARY 2011] OF THE AMERICAN EDUCATION RESEARCH ASSOCIATION AND WITH APPLICABLE FEDERAL AND STATE LAW INCLUDING, WITHOUT LIMITATION, THE FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA) 20 U.S. CODE § 1232G(A)(4)(A); 34 CFR § 99.3; PROTECTION OF PUPIL RIGHTS AMENDMENT (PPRA) 20 U.S. CODE § 1232H; THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA; 45 CFR PART 164); PROTECTION OF HUMAN SUBJECTS 45 CFR PART 46; AND STATE LAW (FLORIDA STATUTES 1002.22, 1002.221).

- PROPOSED RESEARCH ALIGNS WITH DISTRICT GOALS AND OBJECTIVES, DEMONSTRATES POTENTIAL BENEFIT FOR THE DISTRICT, AND DOES NOT NEGATIVELY IMPACT INSTRUCTIONAL TIME, RESOURCES, OR SCHOOL OPERATIONS.

- PROPOSED RESEARCH ALIGNS WITH DISTRICT PRIORITIES, WHICH ARE SUBJECT TO CHANGE OVER TIME.

- ADHERENCE TO BOARD POLICIES ADDRESSING STUDENT INFORMATION INCLUDING, WITHOUT LIMITATION:

    - **POLICY 5100.1** WHICH ADDRESSES STUDENT RECORDS CONFIDENTIALITY AND FAMILY EDUCATIONAL RIGHTS.

    - **POLICY 5100.2** WHICH ADDRESSES STUDENT RECORDS: TRANSFER, RETENTION, AND DISPOSAL.

    - **POLICY 4019** WHICH ADDRESSES PROTECTED HEALTH INFORMATION COVERED BY THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA).

    - **POLICY 5306** WHICH ADDRESSES SCHOOL AND DISTRICT TECHNOLOGY USAGE.

THE ABOVE REQUIREMENTS DO NOT APPLY TO CURRICULUM AND INSTRUCTIONAL ACTIVITIES PREPARED AND IMPLEMENTED BY DISTRICT TEACHERS NOR TO THE DAILY, WEEKLY, GRADE PERIOD, SEMESTER, OR FINAL TESTS OR EXAMINATIONS PREPARED BY DISTRICT TEACHERS AND COVER SUBJECT MATTER CONTENT OR STATE OR DISTRICT MANDATED ASSESSMENTS.

II. DEFINITIONS

A. Research Studies involve the systematic application of methods to observe, collect (via surveys, interviews, focus groups, tests, observations, database extractions, etc.), and analyze quantitative or qualitative data to determine conditions, facts, or opinions related to the educational environment.

B. Program Evaluation Studies use many research and data analysis methods applied to understanding the implementation and impact of District and school initiatives, vendor-purchased programs, and instructional interventions.

C. Researcher(s) include any individual(s) or organization(s), including those based at universities, public or private agencies, government organizations, school district employees, and non-affiliated individuals seeking to conduct basic or applied research or program evaluations at District schools.

D. Research Request is the process by which prospective researchers submit a proposal to conduct research in District schools. This two-step process comprising review and approval by: (1) the IRB process for adherence to ethical and legal standards and (2) the Research Review process for impact on school and District operations and potential benefit to the District.

E. Institutional Review Board is a federally-recognized committee established to approve, monitor, and review research involving humans by ensuring compliance with ethical and legal standards designed to protect the welfare of the research participants. The District's IRB is overseen by the Program Evaluation Department.

F. Ethics Guidelines refer to the following rules and principles designed to address the well-being of individuals participating in research studies: the Code of Ethics of the American Education Research Association (AERA) (approved February 2011) and Standards 8.01 through 8.15 inclusive of the Ethical Principles of Psychologists and Code of Conduct adopted by the American Psychological Association (APA) (adopted August 21, 2001, as amended February 20, 2010).

G. Informed Consent is a process by which an individual voluntarily agrees to participate in research based on the full understanding of his or her rights, the purpose of the study, the research activities to be conducted, and the potential risks and benefits of participation, so they can make an informed decision about whether or not to voluntarily participate.

H. Parent means either or both parents of a student and includes a biological and/or adoptive parent, a guardian, foster parent, any person in a parental relationship to a student, or any person exercising supervisory authority over a student in place of the parent. This includes parents of a dependent student as defined by the Internal Revenue Service Code 152 of 1986. Also included: a properly appointed surrogate parent for a student with disabilities (see Policy 5100.1).

I. **Education Records** are information directly related to a student and maintained by an educational agency or institution or by an individual or entity acting for the agency or institution. Refer to 20 U.S. Code § 1232G(A)(4)(A) and FERPA (34 CFR § 99.3; see Policy 5100.1).

J. **Personally Identifiable Information (PII)** refers to information, such as a student's name or identification number that can be used to distinguish or trace an individual's identity either directly or indirectly through linkages with other information. Refer to FERPA (34 CFR § 99.3; see Policy 5100.1).

K. **De-identification** means the removal (redaction) of all personally identifiable information from data records to protect the privacy of students and families (see Policy 5100.1).

L. **FERPA** (Family Educational Rights and Privacy Act) protects the privacy rights of students and their parents with respect to education records (20 U.S. Code § 1232g).

M. **PPRA** (Protection of Pupil Rights Amendment) provides certain rights to parents, guardians, or eligible students pertaining to surveys and the collection and use of information (20 U.S. Code § 1232h; 34 CFR § 98).

N. **Confidentiality** ensures that identifiable person-level data and information collected from research participants is not shared beyond the researchers immediately associated with the work, unless the prior written consent of the parent/guardian is obtained, or in accordance with federal and state law.

III. RESEARCH SUBJECT TO REVIEW

A. Research and evaluation studies that are subject to review include those that use:

1. interventions or procedures that alter the standard activities of students, staff, and/or school operations for the purpose of evaluating a program/intervention;
2. data collection instruments that are not part of the normal school operations including, but not limited to, interviews, surveys, observations, or other assessments; or
3. archival student and staff data for external analysis.

B. Research and evaluation studies initiated as part of grants, partnerships, or department initiatives that use procedures such as those outlined above, must be submitted for review.

C. Research and evaluation studies found to be "exempt" by external IRBs must be submitted for review.

D. This policy shall not apply to research projects being conducted as part of their course work by students currently enrolled in District schools.

IV. INSTITUTIONAL REVIEW BOARD AND RESEARCH REVIEW

A. The IRB and Research Review Process is a comprehensive, two-step Research Request process. All research, including studies certified as exempt by an external IRB, are required to secure approval through the District's IRB and Research Review process. The IRB and Research Review process includes two components:

1. **IRB Review**: Ensures protection of District students, parents, and staff by complying with the Ethics Guidelines, as well as applicable federal and state laws and regulations including, without limitation, FERPA and PPRA.

2. **Research Review**: Ensures proposed research aligns with the District's goals and objectives, benefits the District, and does not negatively impact staff and student instructional time, resources, or school operations.

Researchers are required to submit their Research Request electronically via an online submission process established by the Program Evaluation Department. Applicants must comply with, and be accountable to, all aspects of the review process and research protocol, which are documented on the District Research Request website.

The School Board is committed to preserving instructional time and providing an optimal environment for teaching and learning for staff and students. The IRB and Research Review process requires applicants to submit a proposal on a District-created template that captures critical information including, but not limited to, the purpose, scope, rationale, research design, research questions, target populations, data collection methods, data sources, project dates, and duration. Applicants must submit supporting documentation, including IRB approval from a sponsoring institution, conflict of interest forms, recruitment information, consent and assent forms, survey instruments, assessments, interview protocol, and any other information that may inform the impact of the study on District staff or students. Additional conditions may be required to complete a review, depending upon the specific details of the Research Request.

If approved, applicants must comply with all aspects of the study, scope, and methods as outlined in the proposal and documents submitted. Any changes to procedures or the protocol approved by the District's IRB must be submitted for approval prior to implementing the requested changes.

B. IRB Review ensures the protection of the rights, safety, and well-being of human subjects involved in research. This is accomplished by reviewing all proposed research protocols including, but not limited to, methods, tests, surveys, and informed consent documents.

1. **The District IRB is registered** with the U.S. Department of Health and Human Services' Office of Human Research Protections (OHRP):

    a. IRB Registration Number: IRB00005849

    b. Federalwide Assurance Number: FWA00011214

    The Federalwide Assurance (FWA) is accepted and approved by OHRP. Through the FWA, the School Board commits to the OHRP that it will comply with the requirements for the protection of human subjects in the Code of Federal Regulations in Title 45, Part 46, also known as the Common Rule.

2. **The Common Rule** gives the District's IRB the authority to: a) determine the level of review required, b) approve or deny research, c) modify research, d) conduct continuing reviews, and e) suspend or terminate research. Principal Investigators that wish to conduct research in District schools must be familiar with, and abide by, all aspects of the Common Rule.

3. **Continuing review** of approved protocols is conducted annually. It is the responsibility of the Principal Investigator to:

    a. submit a *Change Request* to update any changes in the research protocol for review and approval. No changes may be implemented prior to approval except in the interests of the immediate safety of the subjects as stipulated by the Common Rule.

    b. submit a *Renewal Request* prior to the annual expiration date for research not completed in the approved time frame. Regardless of whether the approved research is a single-year or multi-year study, the District's IRB only approves research for a period of one year. Research not completed within the timeframe specified in the approved protocol will require re-approval by participating schools and staff on an annual basis.

    c. immediately notify the District's IRB staff of any adverse events to subjects that result from their participation in the approved research.

    d. submit an electronic copy of the final research report to the District's IRB staff following the expiration date of the approved study.

4. **The Common Rule** (46.113) stipulates that the District's IRB has the authority to **suspend or terminate** approved research that is not being conducted in accordance with the approved IRB protocol.

C. Research Review ensures that approved research aligns with the goals and objectives of the District's Strategic Plan, contributes to improving student outcomes, staff effectiveness, program impact, or district efficiency, and does not negatively impact instructional time and resources. This is accomplished by assessing the benefit and impact of the proposed research on students, staff, and school and district resources**.**

1. **The Research Review process** is designed to determine if the proposed research is compatible with a public school setting, research questions are of interest to the District, and the benefits outweigh the impact of the project on students, staff, and resources.

2. **Approval** (and renewal) **is subject to current district conditions**. Research Requests that fulfill all IRB requirements may be denied or not renewed if:

    a. reviewers find a negative impact of the project on school and/or District operations that outweighs the potential value of the findings to Broward County Public Schools.

    b. the study is not compatible with a public school setting (e.g., studies requiring health/medical interventions) or includes high risk, which will not be considered for approval.

    c. district circumstances (e.g., study conflicts with blackout periods, conflict with current programs, district focus) unrelated to the study prevents successful completion.

    d. reviewers find that the proposed research design has little promise of meeting stated research goals or otherwise employs questionable methods.

3. **Active parent informed consent** is required to ensure that parental permission is obtained prior to their child's participation (see Section V (B)(2) in this Policy).

4. **Informed consent/assent** are required for all research participants.

5. **Data collection instruments** (e.g., surveys, assessments, interview protocol) must be reviewed and approved by the District's IRB staff prior to administration.

6. **Proposed research should not conflict** with - District- and state-mandated testing or other district and school operations. Testing calendars may be found at: www.browardschools.com.

7. **External research applicants, including staff conducting research as part of an advanced degree program, must provide an IRB approval** from a sponsoring institution at the time of application.

8. **Reviews are conducted by school- and/or District-based staff** for each Research Request. Area/content-specific experts and a sample of field-based practitioners are typically assigned to ensure a thorough review of each Research Request.

9. **Decisions** are based on a consensus of reviews conducted by school- and/or District-based staff.

10. **District security protocol** must be followed by all approved researchers and their team members to receive a security identification badge before entering a District campus or sponsored school event, or having contact with staff, students, or parents under any circumstances. Researchers not completing these procedures before visiting a school site will have their IRB approval suspended.

11. **Only principals or district staff identified** on the District's IRB Approval may be contacted to request their participation. If approved research activities involve staff or students of a school, the principal must be contacted first to request participation prior to any contact with staff or students. Principals must be shown the District's IRB Approval at the time participation is requested.

12. **Participation is voluntary**; principals have the right to decline participation for their schools, even with district-approved research. Students, parents, and school staff also have the right to decline participation. In some instances, participation may be a condition of federal or state program participation or membership.

13. **Data transmitted** to a researcher for an approved study may not be used for any subsequent or non-approved study without the written consent of the District's IRB and is subject to district protocol.

14. **Research reports** resulting from research conducted in District schools must be submitted electronically to the Program Evaluation Department in accordance with IRB and Research Review protocol. These reports will be archived and made available for reference to District staff. Reports to be published by researchers are subject to the following conditions:

    a. Researchers must disclose intent to disseminate findings in publications, at conferences, in seminars, or by electronic distribution.

    b. District administration reserves the right to review and request data and analyses informing report and findings.

    c. District administration reserves the right to attach comment to documents to be submitted for publication.

15. **Termination** of research studies may occur at any time due to failure on the part of the researcher to abide by the IRB and Research Review approved protocol, adverse events resulting from the research activities, or changing circumstances within the District. The School Board will be under no obligation to reimburse, nor held liable for costs incurred by the researcher due to termination.

V. CONFIDENTIALITY AND INFORMED CONSENT

A. Research and evaluation studies conducted in District schools shall comply with Policy 5100.1, Student Records: Confidentiality and Family Educational Rights and FERPA.

B. **Informed consent** of adult participants or of a parent/guardian on behalf of a student must be secured by the researcher prior to conducting research activities or collecting data from District students, parents, or staff.

1. **Informed consent and assent forms** must include information regarding the research activities in a manner appropriate for the audience. Content should include, but not be limited to, purpose of the study, description of research activities (e.g., activities, tests, interviews, classroom observations, videotaping), description of the risks and benefits expected in the study, description of data to be collected which may include information from education records, statement regarding confidentiality of records and data collected, contact information for the principal investigator, and where to access additional information (e.g., surveys).

2. **Active parent consent is required** for students younger than 18 years old. Students under 18 years old cannot participate in research conducted in District schools without the active informed consent of a parent/guardian. Active parent consent requires a written response indicating their approval of their child's participation in the proposed research.

3. **Parents/guardians have the right to inspect**, upon request, all surveys, instructional materials, and any other materials used for the conduct of research studies.

4. **Student assent is required for students under 18 years old** along with the active parent informed consent.

5. **Adult informed consent** is required for adults, including teachers, staff, and students over 18 years of age, prior to participating in research studies.

AUTHORITY:

F.S. 1001.41, 1001.42
Adopted: 6/22/1967
Readopted: 9/5/1974
Amended: 2/12/1970, 5/20/1971, TBA/TBA/2017