

## Guidance on Research in K-12 Schools

School based research projects require special considerations beyond the federal regulations and University policy. This guidance provides an overview of the unique aspects of conducting research in K-12 schools.

### Site Permission

K-12 school sites are autonomous institutions that retain the right to approve/reject any human subjects research to be conducted at their site, in their facilities, or with their teachers, staff or students. Therefore, for research in schools, the UNM IRB requires site permission documentation from an appropriate authority as determined by each school and/or district.

Each K-12 site may have different procedures for approving external research. It is the expectation of the IRB that researchers will contact the schools/districts/administrators to get permission from the appropriate authority. Depending on the specific site, permission may be granted by a superintendent, a principal, and/or by a committee at the district (e.g. Albuquerque Public Schools (APS) and Rio Rancho Public Schools (RRPS) have their own external research review committees).

If a district uses a committee to review research proposals, it is important to plan additional time into the approval process since the project will be reviewed by both the UNM IRB and the school's review committee. Often K-12 school sites will require proof of IRB review prior to their approval. If this is the case, once approval is obtained at the site(s), an amendment must then be submitted to the UNM IRB to add that site to the project.

As sites differ in their review and approval process, the IRB sees many different types of site permission documentation. However, any letter of support/approval must indicate that the site authorizing entity understands the scope of the project and the nature of researcher interactions with students. In addition, the IRB generally looks for the following to be included in site permission letters:

- Protocol title (or name of study);
- A scope of the research and/or activities to be conducted at the site;
- Time frame in which research will be conducted;
- Person or entity providing permission (including title, contact information, and confirmation of appropriate authority to provide permission).

### Private or Charter Schools

Charter schools have their own governing boards and most operate independently of local school districts. The NM Public Education Department has oversight responsibility for charter schools and annually review the progress of every charter school.

In general, laws and regulations relating to health and safety, civil rights, prohibitions against advocacy of unlawful behavior, and most other matters are the same for both charter schools and other public schools. Researchers choosing to conduct research in private or charter schools should work with the school administration to determine where "district-level" approval should come from for their research.

**Engagement**

If teachers or school staff are engaged in research activities taking place in their school or classroom, they must complete human subjects protection training (CITI or NIH), submit a Financial Conflict of Interest disclosure and be listed on the project team. The UNM IRB defines engagement based on involvement in any research activities including recruitment, consenting, data collection, data analysis, answering questions about the project, etc.

**Background checks**

Some schools require research personnel to undergo background checks. For example, both APS and RRPS require background checks for members of the project team engaging in research activities with their students. Note that there may be costs associated with these requirements.

**Use of instructional time for research purposes**

Many school districts will not allow research activities to take place during normal class time. An important distinction that should be included in the protocol is whether the research will be presented in classrooms as part of the district's standard curriculum, as that distinction often affects IRB review. Please consider this as part of your research design and consult with the school authorities accordingly.

**Program Evaluation**

When the project involves program evaluation, the IRB protocol must clearly differentiate between the teaching program (which may be conducted regardless of the evaluation) and the evaluation procedures. Often, the evaluation procedures are what constitute "research" and are what require the approval of the IRB rather than the procedures conducted in the actual teaching program.

**Research on certain topics**

School districts may restrict research in schools on certain topics, such as sexual behavior, orientation, gender, illegal behaviors or immigration status. Be sure to check with the district or school to ensure they will allow data to be collected on these and other controversial topics.

**Informed Consent/Child Assent**

Parental permission is required for minors to be included as research subjects. It is important to plan for an appropriate method to obtain consent from parents (i.e. send the study information and consent forms to parents for review, ensure clear understanding of research procedures, answer questions, etc.). Often, researchers will ask teachers or school staff to facilitate this process by sending home recruitment material and consent forms with students in their 'backpack mail' or through school email. When recruiting in this manner, the researcher's contact information should be included in this information. School employees should not act as authoritative representatives of the researchers, as this would result in the school system becoming "engaged" in the research (see the [OHRP Guidance Document on Engagement in Research](#) for more on engagement). Therefore, you will need to plan for a method of collecting the forms from the parents, without engaging staff.

Another important consideration when conducting research with students is that their parents may not be able to speak or read an English language permission form. In these cases, a translated Parental Permission form must be submitted and approved by the IRB prior to use (see [SOP 506 Translation for](#)

[Non-English Speaking Participants](#)) or another appropriate plan must be developed and approved by the IRB.

“Opt-out” or “passive” consent methods, in which a lack of response is presumed to constitute consent, assent, or parental permission are not allowable under federal regulation or University policy, and will not be approved by the UNM IRB. In the case of parental permission, the more logical presumption from non-response is that the forms never made it to the parents or the parent(s) does not want their child to participate.

Child assent is also required prior to including minors as research subjects. Once parental consent has been obtained, students can be asked to provide assent. The assent process follows the consent process, and should be similar format/procedures. The assent procedures and document should be appropriate for the subject population (reading level, language, questions, etc.). See [SOP 501 Informed Consent](#) for more information.

In cases where obtaining child assent or parental permission would not be practicable (that is, the research could not possibly be accomplished if affirmative consent is required), a waiver of consent or a waiver of documentation of consent may be granted by the IRB. One example of where a waiver may be appropriate is in the case where a school has adopted a new curriculum as the standard for the class, and all students will participate in that curriculum. In this case, a waiver of consent may be appropriate for the experimental intervention (the new curriculum). However, data collection conducted to assess that curriculum should still be carried out with the assent of the child and parental permission.

### **Use of Video or Audio Recording**

Many schools place limitations on the use of video or audio recording in classrooms. Typically, research recordings should only capture students who have agreed to participate in the study. The school may want details regarding your video/audio recording procedure, and the IRB requires that this is included as part of your description of the scope of research to potential sites.

### **FERPA**

The Family Educational Rights and Privacy Act (FERPA) is a federal law that protects the privacy of student education records (ER) maintained by schools. ER include class assignments, grades, GPA, attendance, disciplinary reports, individual student educational plans, etc.

A researcher who has natural access to student records as part of their employment cannot access those records for research purposes without appropriate consent. Parental consent is required for the release of FERPA protected student records for minors. See [Guidance on FERPA](#) for more information.

### **PPRA**

The Protection of Pupil Rights Amendment (PPRA) is a federal law that affords certain rights to parents of minor students with regard to surveys that ask questions of a personal nature. PPRA applies to educational agencies or institutions that received funds from any program of the U.S. Department of Education (ED). Thus, public secondary schools are subject to PPRA.

Researchers conducting studies funded in whole or part by any program administered by ED must adhere to the following:

- A. If the research involves the administration of any ED-funded materials such as a survey, analysis or evaluation to children, researchers must make these materials available for inspection by their parents. If the research is subject to PPRA regulations, the researcher should describe in the IRB application how the materials will be made available to parents for inspection.
- B. Researchers must obtain written parental permission before asking minor students to participate in any ED-funded survey, analysis, or evaluation that reveals information falling in one of the protected information categories. An example of a protected information category is a survey that asks questions about mental and psychological problems potentially embarrassing to the student and his/her family. See the [ED website](#) for the full list of the protected information categories. The IRB does not have the authority to waive written parental permission for research that falls under PPRA regulations. The protocol should describe how parental permission will be obtained.

## Resources

Different school districts may have additional requirements or review procedures. It is highly recommended that researchers contact the school district in which they intend to do the research early, and involve them in the development of any research protocol.

Contact information for local school districts:

### **Albuquerque Public Schools**

Office of Research and Evaluation

<http://www.aps.edu/re/research-applications>

Contact: Michelle Drummond, Ph.D.

Chair, Research and Evaluation Committee

Telephone: 505-872-6803

### **Rio Rancho Public Schools**

Research, Assessment, Data & Accountability

[https://www.rrps.net/departments/r\\_a\\_d\\_a](https://www.rrps.net/departments/r_a_d_a)

Contact: Happy Miller, Ph.D.

Executive Director, RADA

Telephone: 505-962-1147