

RESEARCH CONDUCTED IN ELEMENTARY AND SECONDARY SCHOOLS

This guidance focuses on research conducted in elementary and secondary schools. For more information on research conducted in post-secondary schools, please see the IGS: Research Conducted in Post-Secondary Schools.

Federal Research Regulations

Federal regulations consider children to be vulnerable populations. Investigators conducting research in elementary and secondary schools should also read the *Investigator Guidance Series: Research Involving Children*. In addition, there are Department of Education regulations which affect certain types of research conducted in schools. These regulations will be described in further detail in this document.

Description

Research projects conducted in elementary and secondary schools have specific issues that need to be addressed. This document will provide guidance to investigators conducting research in these schools. Although this guidance is primarily focused on the use of students as research participants, the same approvals would need to be obtained whether or not the participants are children or adults (e.g. teachers as subjects of the research).

Approvals Required Prior to Conducting Research in a School

An investigator who is staff or faculty of the University of Utah that is also an employee of a school or school district (e.g. a school counselor, teacher, etc.) may have access to school records and the school population as a part of their regular work duties. Alternatively, the investigator may not be professionally associated with the school, but would like to conduct research using a specific child population. In either case, IRB approval needs to be secured prior to collection of information or data for use in a research project. In addition to IRB approval, written permission must be obtained by the school district and from the school principal(s) prior to conducting research procedures.

Family Educational Rights and Privacy Act (FERPA)

FERPA seeks to ensure student and parental rights in education including student information privacy. FERPA regulations permit educational agencies and institutions to disclose personal identifiable information from education records¹ without consent under specific conditions for research studies. In order for the IRB to ensure that privacy is protected, the letter of permission from the school district must confirm the study's adherence to FERPA and provide a determination whether written consent to disclose student information is required.

Protection of Pupil Rights Amendment (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. New

¹ The term "education records" is defined as those records that contain information directly related to a student and which are maintained by an educational agency or institution or by a party acting for the agency or institution.

provisions of PPRA apply to educational agencies or institutions that receive funds from any program of the Department of Education (ED). Thus, public elementary and secondary schools are subject to the new provisions of PPRA.

Investigators conducting research 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, investigators must make these materials available for inspection by their parents. If the research is subject to PPRA regulations, the investigator should describe in the IRB application how the materials will be made available to parents for inspection.
- B. Investigators must obtain written parental permission before minor students are required 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 [appendix A](#) for the full list of the protected information categories. The IRB does not have the authority to waive written parental permission when an investigator conducts research that falls under PPRA regulations. The investigator should describe in the IRB application how parental permission will be obtained.

Investigators conducting research not directly funded by ED but conducted in public schools (or a local education agency) must obtain the following:

- A. The letter of approval from the school district must confirm that the school has adopted policies required by the PPRA and that the school agrees that the proposed study complies with these policies. See [appendix A](#) for the full description of PPRA.

Private or Charter Schools

Charter schools have their own governing boards and most operate independently of local school districts. The Utah State Board of Education and the [State Charter School Board](#) have 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. Investigators 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.

Informed Consent (Assent, Parental Permission)

As with other research, obtaining informed consent is required for research conducted in schools.

Generally, the University of Utah IRB requires assent for school-aged students (ages 7 and older).

Parental permission is also required in order for children to participate in research. Obtaining parental permission and assent in school-based research may present challenges to the investigator.

Investigators may want to work closely with school administrators or teachers as their support may be important in the return of forms. Investigators may consider providing an incentive to return forms.

Please contact the IRB Office at (801) 581-3655 or irb@hsc.utah.edu for additional guidance.

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Plans to obtain parental permission and assent should be described thoroughly in the IRB application and approved by the IRB prior to initiation.

In certain circumstances, investigators may request for parental permission and assent to be waived. See the *Investigator Guidance Series: Assent* for the criteria which must be met for the IRB to waive assent. See the *Investigator Guidance Series: Parental Permission* for the criteria which must be met for the IRB to waive parental permission. Parental permission cannot be waived when an investigator conducts research that falls under PPRA regulations (see above).

A process to notify parents about research and give them the option to remove their child from the research may be used **only** if the IRB has waived the requirement for parental permission. Investigators may use the template entitled, “Parental Notification Letter” available on the IRB website. Both a Request for Waiver of Informed Consent (i.e. Parental Permission) in the ERICA application and a Parental Notification Letter should be submitted to the IRB if the investigator intends to use the parental notification method.

Additional Considerations

Alternate Procedures

In the event parents do not allow children to participate, investigators should make accommodations for children not participating keeping in mind that these children should not be made to feel excluded from activities.

Teacher Involvement

Investigators are responsible for conducting study procedures. In school-based research, investigators should not have classroom teachers conduct study procedures unless the classroom teacher has been listed as co-investigator in the IRB application.

Program Evaluation

When the project involves program evaluation, the IRB application must clearly to differentiate between the teaching program (which may be conducted regardless of the evaluation) and the evaluation procedures. Often, it is the evaluation procedures which constitutes the “research” and is what requires the approval of the IRB rather than the procedures conducted in the actual program.

Points to Address

- New Study Application:**
- 1. Participants Page:** Select “Less than 7 years old” and/or “7-17” years old, as applicable. Enter the exact age range of participants (e.g. 1-12 years old).
 - 2. Vulnerable Populations Page:** Complete all the sections on this page as they apply to children students as a vulnerable population.

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Documents and Attachments:

1. Attach letters of approval from the school district(s) AND the school(s) where research will be conducted. As applicable, the letters should indicate the school district's adherence to FRPA and/or PPRA.
2. If you are seeking a waiver of parental permission, please attach a Parental Notification Letter using the IRB template.

References & Links

Protection of Pupil Rights Amendment

Search the term "PPRA" at www.ed.gov

Family Educational Rights and Privacy Act

Search the term "FERPA" at www.ed.gov

Investigator Guidance Series: Research Involving Children

http://www.research.utah.edu/irb/guidelines/investigator_guidance.html

Investigator Guidance Series: Parental Permission

http://www.research.utah.edu/irb/guidelines/investigator_guidance.html

Investigator Guidance Series: Assent

http://www.research.utah.edu/irb/guidelines/investigator_guidance.html

Utah State Office of Education, Charter Schools

<http://schools.utah.gov/charterschools/>

Please contact the IRB Office at (801) 581-3655 or irb@hsc.utah.edu for additional guidance.

Appendix A: The Protection of Pupil Rights Amendment (PPRA)

The following provision applies to surveys funded in whole or part by any program administered by the U. S. Department of Education (ED). PPRA provides:

- that schools and contractors make instructional materials available for inspection by parents if those materials will be used in connection with an ED-funded survey, analysis, or evaluation in which their children participate; and
- that schools and contractors obtain prior written parental consent before minor students are required to participate in any ED-funded survey, analysis, or evaluation that reveals information concerning:
 1. political affiliations or beliefs of the student or the student's parent;
 2. mental and psychological problems of the student or the student's family;
 3. sex behavior or attitudes;
 4. illegal, anti-social, self-incriminating, or demeaning behavior;
 5. critical appraisals of other individuals with whom respondents have close family relationships;
 6. legally recognized privileged or analogous relationships, such as those of lawyers, physicians, and ministers;
 7. religious practices, affiliations, or beliefs of the student or student's parent; or
 8. income (other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program).

These provisions of PPRA generally apply when a survey is funded, at least in part, by any program administered by the Secretary of Education.

Surveys Funded by Sources Other than U.S. Department of Education

The new provisions of PPRA apply to educational agencies or institutions that receive funds from any program of the Department of Education. Thus, public elementary and secondary schools are subject to the new provisions of PPRA. Here are the new requirements:

- Schools are required to develop and adopt policies - in conjunction with parents - regarding the following -
 1. The right of parents to inspect, upon request, a survey created by a third party before the survey is administered or distributed by a school to students.
 2. Arrangements to protect student privacy in the event of the administration of a survey to students, including the right of parents to inspect, upon request, the survey, if the survey contains one or more of the same eight items of information noted above.
 3. The right of parents to inspect, upon request, any instructional material used as part of the educational curriculum for students.
 4. The administration of physical examinations or screenings that the school may administer to students.
 5. The collection, disclosure, or use of personal information collected from students for the purpose of marketing or selling, or otherwise providing the information to others for that purpose.
 6. The right of parents to inspect, upon request, any instrument used in the collection of information, as described in number 5.

Please contact the IRB Office at (801) 581-3655 or irb@hsc.utah.edu for additional guidance.