



## 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. All documentation from the school or institution should be retained by the investigator.

#### 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 records<sup>1</sup> without consent under specific conditions for research studies. FERPA applies to all educational agencies and institutions (e.g., schools) that receive funding from any program administered by the U.S. Department of Education.

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<sup>1</sup> 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.

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



### 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<sup>2</sup>. Provisions of PPRA apply to educational agencies or institutions that receive funds from any program of the U.S. Department of Education (ED). Thus, public elementary and secondary schools are subject to the new provisions of PPRA. Investigators whose research is subject to PPRA should review the policies of the school or institution and be familiar with PPRA requirements.

**In order for the IRB to ensure that privacy is protected, verification of privacy protection signed by a representative of the school or institution must confirm the study's adherence to FERPA and PPRA, as applicable.** Please see the IRB website for the Privacy Protection Verification for Research Conducted in Schools form. The verification should be included with your IRB submission.

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

Generally, the University of Utah IRB requires assent for school-aged students (ages 7 and older). Based on the age, maturity, and psychological state of the children, the IRB will determine whether assent is a requirement of all children, some of the children or none of the children. If assent is not a

<sup>2</sup> 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).

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requirement for some or all children, the IRB will make the appropriate finding (see the *Investigator Guidance Series: Assent* for additional details regarding findings).

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. ~~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. 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.

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## 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. 51-12 years old).
  - 2. Vulnerable Populations Page:** Complete all the sections on this page as they apply to children students as a vulnerable population.
  - 3. Documents and Attachments Page:** Attach the completed Privacy Protection Verification for Research Conducted in Schools under “Other Documents.”

## References & Links

[Privacy Protection Verification for Research Conducted in Schools](https://irb.utah.edu/forms/index.php)

*Protection of Pupil Rights Amendment* <https://studentprivacy.ed.gov>

*Family Educational Rights and Privacy Act* <https://studentprivacy.ed.gov>

*Investigator Guidance Series: Research Involving Children* <http://irb.utah.edu/guidelines/investigator.php>

*Investigator Guidance Series: Parental Permission* <http://irb.utah.edu/guidelines/investigator.php>

*Investigator Guidance Series: Assent* <http://irb.utah.edu/guidelines/investigator.php>

*Utah State Office of Education, Charter Schools* <https://www.schools.utah.gov/charterschools>

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