Guidelines for Conducting Research in New York City Public Schools

THE NEW YORK CITY DEPARTMENT OF EDUCATION
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The New York City Department of Education is the largest school system in the nation. Its student population varies considerably in its demographic, cultural, linguistic, and academic characteristics. There is also a great variety of programs established to meet the needs of this diverse population. As a result, many researchers are interested in conducting studies in the system.

While the Department of Education (DOE) allows researchers to conduct studies in our school system, it must ensure that all research does not compromise the privacy of our students and their parents, or disrupt the work of our students, administrators and teachers. Consequently, the DOE only approves research proposals that meet professional standards for the treatment of human subjects, research design and ethical practices, and additionally have significance and relevance for the NYC public school system. For this reason, the DOE has developed guidelines for investigators who wish to conduct research in our schools and it has convened an Institutional Review Board (IRB), to review their proposals. This publication presents these guidelines and summarizes the proposal review process. Please read it carefully.

What is the Institutional Review Board?
In 1980, the DOE established the Proposal Review Committee, now known as the Institutional Review Board (IRB), to screen external requests to conduct research in New York City public schools. It is composed of staff and consultants from the DOE, and at least one member who is not affiliated with the DOE. Other DOE staff and other city agencies provide expertise as warranted by specific proposals. The IRB reviews over 350 proposals every school year.

Who should submit a proposal to the IRB?
Any person who wishes to conduct research at a school site or gather information from students or school staff must obtain written approval from the IRB. Graduate and undergraduate degree candidates, university faculty, independent researchers, and private and public agencies must all submit proposals before conducting research. This procedure applies even if the researcher is employed by the school system in another capacity (e.g., school administrators and teachers conducting research for graduate studies).

Please note that approval to conduct research is in effect for one year only. If the study is not completed within a year, the researcher must apply for a continuation detailing any changes made to the previously approved research proposal, including changes to the original timeline, research participants yet to be recruited, copies of revised forms, letters and protocols and a summary of findings to date.

IMPORTANT NOTICE: As of October 13, 2011, all new proposals, continuation requests and amendments to approved research protocols must be submitted through the NYC Department of Education’s electronic submission platform, IRBManager. To log on to the system go to https://nycdoe.my.irbmanager.com and follow the instructions for creating a password (click here).
What proposal materials should be submitted using the electronic submission process?
When you open the submission form, you will be asked to provide the following types of information about your research study in lieu of submitting a research proposal:

- A statement of the research questions and objectives and a description of the implications of the research for New York City schools, including the educational challenge(s) addressed by the research.
- A research methodology that fully describes the subjects and details the instruments and procedures in collecting the study’s data. It should be as specific as possible in regard to the number of subjects and how they are recruited and the estimated time required of the participants for the study’s research activities.
- A description of the study site(s) and a timeline that outlines the research methodology and activities.
- Consent/assent letters for the study’s participants including school administrators, teachers, other school staff, students and parents, and DOE officials. For additional guidance on consent letters, please read the section on Informed Consent on page 4.
- A plan to guarantee confidentiality for research subjects and to ensure that study findings are reported anonymously.
- A statement of the risks and benefits of the study.
- All surveys, questionnaires, and protocols for interviews, focus groups and observations, along with any technical data describing validity and reliability of the instruments.
- Student- and school-level data that will be requested from the DOE.
- A letter of invitation to principals to conduct research in their schools.
- A detailed explanation of the data analysis plan.

What criteria are applied by the IRB in considering a research proposal?
The IRB considers a number of factors in its review of a research proposal:

- The proposed research should be of an educational nature and relevant to NYC schools.
- The benefits of the research must outweigh the costs, which include staff and student time and other resources. Any potential risks/benefits for participants should be addressed in the research methods, and steps should be taken to ensure that risks to participants are minimal.
- The study should embody procedures that respect the confidentiality and privacy rights of staff, students, and parents in accordance with Family Educational Rights and Privacy Act (FERPA) guidelines.
- Provision must be made for truly informed consent and assent of participants and parents of student participants.
- The proposal must include sound research methodology that uses reliable and valid instruments.
Researchers should also be aware of the following:
Researchers must obtain prior approval from their own institution’s IRB, if the institution has an IRB.

Teachers, principals and other school staff who wish to conduct research must do so with students and staff other than their own.

Teachers, school administrators and other DOE staff cannot receive compensation (monetary or non-monetary) to participate in research studies. Researchers may provide donations directly to the schools or through an online service such as DonorsChoose.org.

Participation in research studies should be completely voluntary. School administrators should not be asked to select teachers or other staff to participate. In addition, school administrators are not allowed to supply contact information for school/staff, parents, or students, or to provide student data. Data collection is the responsibility of the researcher and should not impose unnecessary burden on teachers and other school staff. Requests for DOE data should be submitted in writing to RPSGresearch@schools.nyc.gov per the data request policy (click here). Researchers requiring identifiable student data must obtain active parental consent to receive such data from the DOE.

Research activities should not take place during instructional time. Researchers should work with school staff to find an appropriate time to conduct research activities.

Informed consent
Most projects require active informed consent from parents/guardians (for all students up to the age of 21) and adult research participants (including students age 18 and older), and assent from students under the age of 18. Consents/assents should be in the form of a letter addressed to parents/guardians or participants. The researcher needs to provide the following information in the consent letter:

- The identification of the researcher(s) conducting the study and the study title;
- The purpose(s) for collecting the data;
- Description of the activities in which participants will be asked to participate (e.g., a survey, interview, etc.);
- A description of any individual student data that you will be requesting from the DOE (e.g., test scores, attendance records, etc.);
- The amount of time involved for participants;
- A statement that all information will remain anonymous and confidential; and that participation is entirely voluntary and participants may withdraw from the study at any time, with no consequences;
- A statement describing risks and benefits of the study;
- A local or 800 phone number for the researcher, so that the parent or participant may contact the researcher if there are questions or concerns;
- A local or 800 phone number for the Administrator/Chair of the researcher’s institution’s IRB if participants have questions/concerns about human rights;
☐ A space for a signature/date and check-off for either consent or refusal to participate. Almost all studies require active consent for the subject’s participation.

☐ If adult participants are to be audio- or videotaped, a separate signature line for research participants’ consent/assent must be provided along with an explanation of the purpose of the tapes as well as a disposal plan for the tapes once research is completed. Audiotaping students also requires active parental consent. Videotaping students for research purposes is not permitted. All videotaping in schools for public use must be approved by the DOE’s Press Office. The title of the research study should be included on the signature page of all consent documents.

Student assent forms should be written in age-appropriate language. An assent script to be read to younger children should be included with your proposal submission if not all participants are of reading age/ability.

Consent forms for parents should be easily understandable and free of technical research terms (8th grade reading level is recommended). If there is the possibility that parents do not understand English, letters in their native language must be provided. Researchers must retain all consent/assent forms, and must be prepared to make them available to a parent, teacher, or DOE official. Proof of active parental consent for the researcher to request identifiable student data must be forwarded to the DOE Research and Policy Support Group as part of the data request process mentioned above. Consent/assent forms, other documents, and research data must be retained in a secure location for a minimum of three years.

The invitation to participate in research should be printed on university or a research group’s stationery and not on that of any office or school of New York City Department of Education (unless the study is being conducted by a DOE office).

The researcher must also send letters to the prospective principals in the study inviting their schools’ participation. These letters should similarly describe your study and its impact upon the school and ensure anonymity, confidentiality and voluntary involvement for all study participants. The letter of invitation should not include a signature line for the principal’s consent, which can only be requested after the study is approved by the IRB.

What are the steps in the review process?
The IRB meets monthly to discuss and review research proposals. DOE IRB staff prescreen proposals as a courtesy to researchers. In most cases, feedback on prescreened proposals will be provided to researchers electronically within 5 business days after the submission deadline. Researchers are encouraged to respond before the IRB meeting to issues identified during prescreening but are not required to do so. After the IRB meeting, an email is sent to the researcher indicating the IRB’s decision to: (1) approve the proposal outright, (2) require the researcher to clarify or modify the proposal, or (3) disapprove the proposal.
PLEASE NOTE: An approval letter indicates that the proposal has met the research and ethical standards required by the DOE. However, schools, school staff and students and non-school-based DOE staff are not obligated to participate in the research. After the proposal has been approved by the IRB researchers must, on their own, obtain the principal’s approval to proceed with the research in their school or district. The researcher must return to the IRB via an attachment to the online submission form a signed principal Approval to Conduct Research in Schools form (provided by the IRB) for all schools where research is being conducted.

In addition, approval letters for research proposals do not guarantee access to DOE data. Researchers who require NYC DOE data must submit a request in writing to RPSGresearch@schools.nyc.gov per the data request policy (click here). We highly suggest reaching out to RPSG in advance of proposal writing to ensure that any data needed for the project to occur successfully is available.

All research personnel who will be entering NYC public schools must be fingerprinted by the NYC DOE and undergo a background check before entering any public schools. Note: New fingerprinting procedures were implemented in October, 2013. The revised instructions for fingerprinting will be sent to researchers at the time they receive their IRB approval letter. Additional information about fingerprinting can be found in the FAQs for researchers on this website.

How long does the review take?

The length of time required to review and approve a proposal depends primarily on the completeness of the proposal and the researcher’s prompt response to requests from the IRB for clarification and/or additional information. Proposals received by the submission deadline for the next IRB meeting will be processed in no more than 4 weeks. Researchers will be informed of the outcome of the IRB review 3-5 business days after the IRB meeting. However, the process may be protracted if a proposal requires extensive clarification and revision.

Post-Research Follow-Up:
Upon completion of a research study, researchers are required to provide their findings to the DOE. Interim findings, if any, should be included with requests for continuation of the research. Please e-mail an electronic copy of your research to IRB@schools.nyc.gov