

CONDUCTING RESEARCH IN NYC PUBLIC SCHOOLS: WHAT PRINCIPALS SHOULD KNOW

The New York City Department of Education (DOE) is the largest, most diverse public school system in the nation. As such, many researchers, educators, and graduate students are interested in conducting research in the system. However, **any person (even those affiliated with the DOE) who wishes to conduct research at a school site must first obtain written approval from the DOE's Institutional Review Board (IRB).** While the DOE allows outside researchers to conduct studies in our school system, it must ensure that research does not compromise the privacy of students and their parents or disrupt the work of our students, administrators and teachers. The DOE only approves research proposals that meet professional and ethical standards for research and have significance and relevance for the NYC public school system. **Even if a researcher has gotten IRB approval, this does not mean that your school has to participate. All research is voluntary, and participation of your school is voluntary.** Principals can learn more about the process researchers must go through before their research is approved by visiting our website at: <http://schools.nyc.gov/Accountability/data/DataRequests>.

Frequently asked questions about DOE IRB policies and procedures follow:

How can I be sure that a researcher has permission to conduct research in my school?

The IRB provides researchers with an *Approval Letter* to confirm that it has authorized their study. This letter must be presented to you by the researcher. Approval is for one year only. Researchers conducting multi-year studies must request a study continuation from the IRB and receive approval for each subsequent year of their study. Any modifications to the original research design must also be approved by the IRB. Researchers who do not have an official DOE IRB Approval Letter should be referred to the IRB at: IRB@schools.nyc.gov or 212-374-7659.

If the research has been approved by the DOE, does that mean I must allow the researcher(s) access to my school?

Approval by the DOE IRB **does not** guarantee access to any particular school, individual or data source. Participation in any approved study is entirely voluntary. A principal may choose for the school not to participate in the research, or may withdraw the school from participation at any time without negative consequences. It is the researcher's responsibility to reach out to principals and other appropriate contacts to get required permissions and informed consent before initiating a study. The researcher must provide the principal with:

1. An Approval Letter from the DOE IRB;
2. A principal letter with information about the purpose of the research, the methodology, who will be recruited to participate and how they will be recruited, confidentiality and anonymity, the time commitment for research subjects, any possible risks/benefits of participation, and intended uses of the research findings.
3. An *Approval to Conduct Research in NYC Schools/Districts* form. *If you agree to grant access, you need to sign this form, which the researcher must return to the DOE IRB. A copy of the form should be retained at the school.*

If a researcher requests that the school provides student records or school-level data, how should I respond?

Teachers and principals should not provide school- or student-level records to researchers. Researchers can request student- and school- level administrative records by submitting a data request to the DOE Research and Policy Support Group at RPSGresearch@schools.nyc.gov. The researcher must obtain explicit, written parent/guardian to access ***identifiable*** student data from the DOE.

Are researchers' backgrounds checked before they enter NYC public schools?

Anyone conducting research in NYC schools must be fingerprinted and pass security clearance prior to going into schools. Researchers must wait a minimum of three business days after fingerprinting before entering a school. The Director of the IRB is notified immediately of issues identified during the background check that would bar a researcher from entering a NYC public school. The IRB Director, in turn, will immediately notify the schools where the researcher was planning to conduct research.

If I consent to my school participating in a research project, is school staff required to participate in the research?

Participation in any study is ***strictly voluntary*** and participants may choose not to participate or withdraw at any time without negative consequences. The researcher must obtain signed consent from all adult research participants. Consent is a confidential process; therefore, principals should refrain from asking teachers whether or not they, as individuals, have consented to participate in a study. However, the principal should be informed of classrooms in the school where students will be participating in the research.

If a researcher asks me to identify or recruit teachers to participate in research, how should I respond?

Principals may help researchers to identify school staff who teach specific grades or who are responsible for specialized curricula/initiatives in the school; however, they cannot single out/recommend individual teachers to participate in research studies, or provide their contact information to researchers. There are a variety of other methods that can be used by researchers to recruit school staff for research studies, such as distributing flyers in teachers' mailboxes and posting recruitment flyers in appropriate locations (e.g., teachers' lounge), with the principal's permission.

If a teacher consents to participate in research, are his/her students required to participate in research?

With few exceptions, the researcher must obtain active consent from parents/guardians for students up to the age of 21 to participate in the research. In studies where the IRB deems the risk associated with a study to be very minimal and a large number of students will be involved, researchers will be approved to use a passive consent process, whereby the parent/guardian returns the consent form only if they do NOT want their child to participate in a study. The type of consent (active or passive) will be specified in the principal letter.

Students also must give their permission to participate in the research. This is referred to as "assent," since children under the age of 18 are considered by federal regulations to be too young to give informed consent (students 18 and over can give informed consent). Researchers must provide students with a description of the research, its risks and benefits, and what student participants will be expected to do. This assent form should be tailored to students' level of comprehension. Student assent

by itself is not sufficient, however; informed consent must still be obtained from the parents or guardian.

Can my teachers or students be compensated for their participation?

NYC law prohibits compensating teachers for their participation in research studies. In lieu of compensating teachers, researchers may make a contribution to the school or to classroom projects through DonorsChoose.org. For elementary school students, compensation should be a modest gift (such as stickers or a pen), valued at no more than \$10. For middle and high school students, compensation should not exceed \$20. Parents also may be compensated for their participation in a research study based on the time commitment that would be expected of them. The compensation associated with the project (if any) will be included in the principal letter.

Can a teacher conduct research with his/her own students in his/her own classroom? Can a principal conduct research with his/her own teachers?

Teachers are **not allowed** to conduct research – defined as “systematic investigation,” including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge” – using their own students as research participants. Teachers may use other students at their school or students in other schools as research participants. Similarly, principals are not allowed to conduct research with teachers or students in their school.

What is the process for researchers to obtain informed consent from students’ parents/guardians?

Consent forms for parents may be sent home in students’ backpacks; however, they must be returned directly to the researcher (they should not be returned to principals or classroom teachers). Researchers may also request that students bring forms back to school and deposit them in a sealed box in a secure location for collection by the researcher.

What if a student (or any other research subject) who gave his/her permission later decides to withdraw from participation?

Participation is entirely voluntary. A student (or any other research subject) may choose to withdraw from the research and be assured that he or she will not suffer any negative consequences, or be denied any benefits that are available to other students who participate. The consent/assent forms will need to advise the parent/guardian and students of how to withdraw from the study.

Can researchers conduct research during instructional time?

With few exceptions, research should not be conducted during instructional time. Researchers should consult the principal and/or teachers to determine the best time and location for collecting data from students, teachers and other school staff.

Should I be worried that others will learn about my responses to a researcher's questions?

The researcher is required to guarantee confidentiality unless IRB approves disclosure of names, and participants give explicit, written consent to use their, and/or their school’s name, in reports of the research findings.

What should I do if the researcher engages in data collection or other research activities that are outside the scope of the approved research?

Principals should report any activities outside of the scope of the research to the NYC Department of Education's Institutional Review at IRB@schools.nyc.gov. Principals may request and be guaranteed anonymity when reporting such situations.

How do I find out about the research findings?

You may ask the researcher for a copy of the final report or contact the Research and Policy Support Group of the DOE IRB@schools.nyc.gov to request a copy of the research report. If the study will take place over several years, you may also ask for interim reports.