

FAQS FOR RESEARCHERS SUBMITTING PROPOSALS TO THE NYC DEPARTMENT OF EDUCATION'S
INSTITUTIONAL REVIEW BOARD
(Revised 3/6/2014)

Note: See Pages 12 & 13 for new fingerprinting procedures.

What is the process for submitting a research proposal?

The NYC Department of Education's Institutional Review Board migrated to a fully electronic proposal submission platform on October 3, 2011. **The NYC DOE IRB no longer accepts research proposals submitted to: RPSGResearch@schools.nyc.gov, IRB@schools.nyc.gov or <http://schools.nyc.gov/Accountability/data/default.htm>.** First-time users will need to submit a request for a temporary password to IRB@schools.nyc.gov in order to log on to the new system at <http://Login.irbmanager.com>. Information about submitting a research proposal to the DOE IRB can be found on the first page of this online submission form. Researchers also should review the *Guidelines for Conducting Research in NYC Public Schools* at: <http://schools.nyc.gov/Accountability/data/default.htm>. Questions about the proposal submission process should be directed to IRB@schools.nyc.gov.

What happens to a research proposal after it is submitted?

Receipt of proposals is acknowledged electronically. Proposals are pre-screened for completeness by Research and Policy Support Group (RPSG) staff. Researchers with incomplete proposals (e.g., lacking consent forms or an IRB letter) are notified by email that revisions are needed. Revisions must be made directly to the online submission form using track changes and must be completed no later than five business days before the next scheduled IRB meeting for a proposal to be included on the meeting agenda. Proposals are assigned to two reviewers who lead the discussion of the proposal at the IRB meeting. After the meeting, an email is sent to the researcher if additional issues with the proposal are identified. When the requested revisions are entered into the online proposal an approval letter is sent to the researcher. If the proposal was not approved, an email is sent outlining the IRB's reasons for disapproving the proposal.

When is DOE IRB approval not required for research?

The DOE IRB does not provide exemptions or waivers. All research conducted within NYC Public Schools must be approved by the DOE IRB regardless of whether the project has received a waiver or exemption from a researcher's home institution's IRB.

DOE IRB approval is not required when the research will not be conducted in NYC Public Schools. For example, requests for extant DOE data do not require IRB approval; rather, they should be submitted directly to the Research and Policy Support Group at RPSGResearch@schools.nyc.gov. The guidelines for submitting data requests that do not involve research in schools can be found at: <http://schools.nyc.gov/Accountability/data/default.htm>.

Identifying and Recruiting Schools and Research Subjects

What procedures for identifying and recruiting research subjects in schools should researchers follow? (How can researchers gain access to subjects for recruitment purposes?)

Approval by the DOE IRB to conduct research in the NYC school system does not guarantee access to any particular school, group, individual, or data source. Principals must agree to research being conducted in their schools. Moreover, the principal's consent does not guarantee the participation of other school personnel or students. Participation in research studies 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. It is the researcher's responsibility to reach out to principals and other appropriate contacts to get required permissions and informed consents before initiating the study. Specifically, the researcher must provide the principal with:

- the DOE IRB approval letter;
- a principal information letter containing the following information:
 - purpose and design of the research,
 - research methodology,
 - recruitment inclusion/exclusion criteria and strategies,
 - confidentiality and anonymity,
 - time commitment for research subjects,
 - risks/benefits of participation, and
 - how the research findings will be used; and
- an *Approval to Conduct Research in Schools* form, which must be signed by the principal and returned to the DOE.

Researchers should also be prepared to provide principals with proof that all key research project personnel have been fingerprinted by the NYC DOE. Key research personnel include principal investigators, field interviewers, faculty advisors to graduate students and research support personnel (e.g., data entry specialists, individuals contacting subjects for scheduling purposes).

May researchers include a statement that the DOE has approved the study in recruitment letters?

This is allowed provided that the letters are not distributed before DOE IRB approval has been granted. Researchers sometimes approach principals of schools where they would like to conduct research to assess principals' interest in having their school participate prior to obtaining DOE IRB approval. At that point, the researcher may not state that the DOE has approved the study.

Does conducting research with children as subjects differ from research with adults?

Yes. Children under the age of 18 are by definition a vulnerable subject group requiring special attention to protection of rights. Research with children also is subject to the policies of the jurisdiction where the research is conducted.

What are the specific NYCDOE jurisdictional concerns about conducting research with children in NYC Public Schools?

In addition to Federal Regulations, the IRB honors several in-house rules and standards with regard to: 1) coercion; 2) informed consent and exemptions; and 3) videotaping.

- ✓ *Coercion*: Our primary special concern at the NYCDOE regards children; therefore, we are especially concerned with the potential for exploitation and coercion of students. Not only are children legally minors, but they oftentimes are also socially and economically disadvantaged. Special attention is given to potential sources of manipulation and coercion, typically when it comes to incentives (whether financial or non-monetary) offered for participation in research.
- ✓ *Informed consent and exemptions*: The NYCDOE never approves waiving of informed consent and specifically encourages *active consent* in which failure to respond constitutes a negative response regarding participation. *Passive consent* in which failure to “opt out” is interpreted as an affirmative answer is prohibited in only a small number of studies. See below for more information on active vs. passive consent. Similarly, the NYCDOE does not designate any research as exempt from review. All submitted proposals will receive a full review, or in a small number of cases, an expedited review conducted by committee of the IRB.
- ✓ *Videotaping* – see below under ***Procedures for Collecting Data from School Personnel and Students***

Can teachers conduct research with their own students?

No. This is prohibited because of the potential for coercion. Teachers may, however, conduct research with other students at their school or at other schools, with the principal’s approval, parent/guardian consent, and student assent.

Are teachers or other school staff required to participate in research that the principal has approved?

No. Participation is strictly voluntary and participants may decline or withdraw at any time without negative consequences.

When do you need active consent from teachers?

Active consent is required from teachers for classroom observations, surveys, interviews, and focus groups. All measures should be taken to provide anonymity for respondents.

Can students be compensated for their participation?

Small gifts may be given to children for their participation. For elementary school students, stickers, pens, or a gift card should not to exceed \$10. For middle and high school students, the value of the incentive should not exceed \$15.

How much can be paid to parents/guardians for their participation?

Compensation for parents/guardians can be based on the number of hours required for their participation in the research (for interviews, and focus groups) or, per completed survey, where the amount of time involved might vary considerable from one participant to another. Compensation may not exceed \$20 an hour or per completed survey.

How much can be paid to teachers for their participation?

NYC law prohibits compensation of teachers for their participation in research. Compensation/gifts that benefit the entire school are suggested as an alternative and may be donated directly to the school or through DonorsChoose.org.

Are there any exceptions to the law prohibiting teachers from being compensated for participating in a research study?

Exceptions are rarely made. Requesting a waiver of this law can take a long time and requires the involvement of the DOE Ethics Officer, the NYC Conflicts Board and, ultimately, the Office of the Schools Chancellor.

Obtaining Informed Consent and Assent

An informed consent can be said to have been given based upon a clear appreciation and understanding of the facts, implications, and future consequences of participating in a research study. In order to give informed consent, the individual concerned must have adequate reasoning faculties and be in possession of all relevant facts at the time consent is given. Informed consent can be complex to evaluate, because neither expressions of consent, nor expressions of understanding of implications, necessarily mean that full adult consent was, in fact, given, nor that full comprehension of relevant issues is internally digested. Reasons that might cause a participant to give consent that is not considered informed include:

- perceived social pressure;
- psychological difficulty in asserting true feelings; and,
- inability to appreciate the possible consequences fully.

Increasingly, the medical and behavioral research community is recognizing that informed consent is more than simply having a research participant to sign a written consent form. It is a process of communication between the researcher and the participant. In particular, potential participants should have ample opportunity to ask questions to elicit a better understanding of the research at the time they sign the consent and at any other time during their participation in a study.

What information should be included in a consent form for adult research participants?

The federal regulations governing informed consent list the following requirements applicable to the type of research conducted in NYC Public Schools:

1. A statement that the study involves research, an explanation of the purposes of the research and the expected duration of the subject's participation, a description of the procedures to be followed, and identification of any procedures which are experimental;
2. A description of any reasonable foreseeable risks or discomforts to the subject;
3. A description of any benefits to the subject or others which may reasonably be expected from the research;
4. A statement describing the extent to which confidentiality of records identifying the subject will be maintained;
5. An explanation of whom to contact for answers to pertinent questions about the research and research subjects' rights, and whom to contact in the event of a research related injury to the subject; and
6. A statement that: (1) participation is voluntary; (2) refusal to participate will involve no penalty or loss of benefits to which the subject is otherwise entitled; and, (3) the subject

may discontinue participation at any time without penalty or loss of benefits to which the subject is otherwise entitled.

Other information required by the DOE IRB includes:

- Procedures to guarantee anonymity, where feasible
- How the data will be secured and disposed of
- Who will have access to the data and what uses it will be put to
- Separate signature lines for permission to audio- and/or videotape and for permission for data use beyond the research team
- The title of the study on the same page as the signature line(s)

What information should be included in a form for parents/guardians to give permission for a child to participate in research?

All of the aforementioned information PLUS assurances that:

- the research will not interfere with instructional time;
- no one but the researcher will know the child's answers to questions; and,
- the child's decision to participate and/or withdraw from the study will not have an impact on his/her grades or any benefits to which students are entitled, including program participation.

What procedures should researchers follow for obtaining informed consent from parents/guardians?

Researchers may distribute consent forms to parents/guardians in a face-to-face meeting or by asking the school to send the forms home with students. The forms must be returned to the researcher, not the school, either in a face-to-face meeting or in a self-addressed, stamped envelope provided for that purpose.

What is the difference between consent and assent?

Assent is the mechanism for obtaining permission from student research participants who are under the age of 18. We use assent with minors because they are not legally considered able to give informed consent. Students between the ages of 18 and 21 should be given a consent form. When obtaining assent from very young children, the researcher may use a script to read the information to the child and then obtain his/her verbal assent with a witness present.

What is the difference between active and passive parental/guardian consent (permission)?

Active consent requires that a signed form be returned to the researcher by parents/guardians stating that they **do, or do not**, give permission for their child participate in the research. In the small number of instances when passive consent is approved, parents/guardians **only respond** in writing or verbally if they **don't** want their child to participate. When using passive consent, researchers must allow 10 business days between distributing consent forms and conducting their research with students.

When does the researcher *not* need **active** consent (permission) from parents/guardians or other subjects?

Passive parent/guardian permission is only allowed when the research is of minimal risk (to be determined by the DOE IRB), and there is a very large sample of students involved, so that it is not feasible for the researcher to obtain active permission.

When is parent/guardian consent (permission) not required?

The exception to this rule is when data are collected as a component of instruction, such as classroom observations. A parent/guardian information letter may substitute for a permission form for classroom observations, when no data is being collected from students, when no student records are being accessed, and when all information collected is entirely confidential.

If a researcher has parent/guardian permission, must the child participate in the research?

No. Students can choose to opt out during the assent process. They also can withdraw from participation at any time.

Is parent/guardian permission needed for students who are not minors (Those who are 18 years or older)?

Yes. In NYC, students may attend school up until the age of 21. For this reason, researchers must request parent/guardian permission for 18-21 year old students to participate in a school-based research study, as well as student consent.

What information should be included on a student assent form?

What is included on a student assent form depends on the age of the student. **Assent forms should be written in age-appropriate language and contain content that the student can comprehend.** Assent forms for middle and high school students might contain most of the information included on a parent/guardian permission form, whereas assent forms for elementary school and younger students should be much simpler. With a simple form/script, the most important elements to include are:

- what the student will be expected to do and how long it will take;
- an explanation that there will be no harm or danger involved;
- a statement that participation is voluntary – the student does not have to participate and can withdraw at any time if he/she becomes uncomfortable; and,
- an explanation that no one will be upset if he/she chooses not to participate, the teacher and others won't know (if this is true), and the student can withdraw at any time without it having any effect on their grades or what the teacher or others think of him/her.

Can the informed consent procedure ever be waived?

No. The informed consent procedure cannot be waived for any studies conducted in NYC public schools.

Can a research participant be consented over the phone?

No. Research participants cannot be consented over the phone since the researcher would have no way of verifying the identity of the person with whom he/she is speaking.

Risks and Benefits for Participants

What level of risk to research participants is acceptable, especially with regard to student participants?

Studies conducted within the NYC public schools must involve minimal risk to participants. While researchers often state that their study involves minimal risk, it is up to the IRB to determine if this is the case. For example, a consent form for focus group participants should

make it clear that the researcher cannot absolutely guarantee confidentiality due to the fact that there is always the possibility that a focus group participant might intentionally or inadvertently disclose information to persons outside the group.

What is the definition of minimal risk?

Minimal risk means that the probability and magnitude of harm or discomfort that might be caused by participation in the research are not greater in and of themselves than those ordinarily encountered in daily life. Also, risks to subjects must be reasonable in relation to anticipated direct benefits, if any, to subjects, along with the importance of knowledge that may reasonably be expected to result.

What types of risks is the DOE IRB concerned about when reviewing a proposal?

Collection of private information from study subjects through surveys, interviews, audio, video or other methods, such as information about a subject's religious affiliation, sexual history, drinking habits, etc., that might expose the study participants to:

- ✓ Psychological risk such as discomfort, embarrassment, worry or anxiety;
- ✓ Financial risk including risk to employability, insurability, etc.;
- ✓ Social risk such as damage to reputation;
- ✓ Risk of breach of confidentiality or anonymity; and
- ✓ Deception.

Procedures for Collecting Data from School Personnel and Students

Can researchers ask a teacher to administer a survey in the classroom?

No. Researchers may not ask teachers to collect any type of data for them.

Can researchers conduct research during instructional time?

The answer is "no" in most cases. The exception to this rule is when data are collected as a component of instruction, such as pre- and post-tests for a curriculum intervention. Other types of research should not be disruptive of the school's educational process. Researchers should consult with the principal and/or teachers to determine the best time and location for collecting data from students, and school staff should be given the choice of being interviewed at the school or at some other location of their choosing.

What are the procedures for conducting focus groups in the school?

All participants must consent to be involved in the focus group. Consent forms must clearly state that the researcher cannot guarantee confidentiality, although he/she will make every effort to do so. If the focus group will be audiotaped, all participants must consent to be taped or no taping may take place. A separate signature line or check box must be provided for consent to audiotape. Focus groups should be held in a location that respects the privacy of the participants.

What school or individual student records can researchers request from principals and/or teachers?

Researchers may not request school or individual student records from principals or other school staff. These records must be requested from the DOE after the research has been approved by the IRB. Guidelines for requesting data from the DOE can be found at

<http://schools.nyc.gov/Accountability/data/default.htm>. The only exception to this rule is when the data the researcher is seeking is only available from the school. Such data requests must be explicitly outlined in the research proposal and approved by the IRB. Even when such requests are approved by the IRB, principals and other school personnel are not obligated to provide such data.

What information can/can't researchers request from the DOE?

Requests for data are handled by RPSG data analysts, not the IRB. In most cases, the data that RPSG provides is scrambled/de-identified. Identifiable student data, including OSIS numbers, are confidential and permission to access records must be obtained from the student's parent/guardian, who is under no obligation to grant permission. It is important to note that acceptance of an IRB proposal that includes accessing certain data elements from the NYCDOE/RPSG does not mean that RPSG is required and/or able to provide the data. It is up to the researcher to file a separate data request based on the guidelines described on our website (<http://schools.nyc.gov/Accountability/data/DataRequests>).

What are the rules/regulations for classroom observations?

Researchers must obtain teachers' consent to observe classroom activities. If the focus of the observation is strictly on the teacher, researchers do not need parent/guardian consent; however, they need to send a letter to parents informing them that there will be an observer in their child's classroom. If students will be a focus of the observation, the researcher must get parental/guardian active consent.

Can students/teachers be audiotaped? What if some parents do not give permission for their child to participate in audiotaping?

Researchers must have consent from the parents for the participation of their child in the classroom observation PLUS a second signature or check box for permission to tape. When audiotaping is carried out in the classroom, students without consent should be identified, sometimes with a photograph, so that the researcher turns off the tape when the student speaks.

Can students/teachers be videotaped?

Videotaping vulnerable human subjects such as children raises issues related to anonymity, privacy, and respect for human dignity. As a medium, videotaping has tremendous potential to be misused, including (but not limited to) being reused for different research projects or displayed on public internet sites without the subject's consent. That said, the DOE distinguishes among (1) videotaping for use in professional development for teacher training and teacher professional development, (2) videotaping for data collection for a research study, and (3) videotaping for public use. Videotaping for public use (e.g., for posting on a public website or other forms of media) is never approved by the DOE IRB. **Requests to conduct videotaping in schools for public use must be approved by the DOE Press Office.**

Videotaping for teacher training and professional development, when the video will only be viewed by the teacher and his/her mentor/coach or teachers in training does not constitute a research procedure. Approval for videotaping for data collection for a research study will be decided on a case-by-case basis since issues relating to the security, disposal, access and future

use of videotapes are more problematic than those for other forms of data. Parents and guardians and other research subjects themselves cannot give *informed* permission for videotaping without knowing exactly how the tapes will be secured, where they will be viewed, who will have access to them (e.g., the PI, other members of the research team), and when they will be destroyed. Using videotape as a convenience in place of field notes or audiotaping for the researcher is not. Data collected from videotaping must have an essential role in the research.

Other Issues Related to Data Collection

Are researchers allowed to collect medical samples from participants?

Researchers may not collect medically-related data (i.e., saliva samples, blood samples, heart rate, height/weight, blood pressure, body mass index) from students. Data on height/weight and body mass are collected annually by the school for the NYC FITNESSGRAM Assessment. Researchers may access these data from the NYCDOE with parental/guardian permission and approval from the Research and Policy Support Group.

Can researchers administer previously validated psychology/clinical tools (i.e., the Child Behavior Checklist, Beck Depression Inventory, Beck Anxiety Inventory, etc)?

Questionnaires that provide researchers with the ability to diagnose/highlight signs of a particular psychological, behavioral, or psychiatric disorder (i.e., depression, anxiety, attention-deficit, and suicidal tendencies) may not be administered.

When is it acceptable to use deception in a study?

Rarely is it acceptable to use deception in a study. Certain types of deception are used when there is no other way to obtain unbiased data from respondents and when the benefits far outweigh the risks. Use of deception requires a detailed debriefing protocol to be used with respondents at the conclusion of their participation in the research, when they are informed that deception was used. Deception relating to guarantees of confidentiality or anonymity for research participants is never permitted. It is up to the discretion of the DOE IRB to determine whether deception is appropriate.

Data Security and Disposal

What qualifies as an adequate data security plan?

Data/record security is critical. Researchers should insure that all hard copy and electronic data are securely stored to prevent unauthorized access, disclosure, or loss. Hard copy records should be stored in a manner that limits access to only authorized individuals. For example, filing cabinets/areas should be locked and placed in secured/locked rooms.

Electronic data should be saved on a device that has the appropriate security safeguards such as unique identification of authorized users, password protection, encryption, automated operating system patch (bug fix) management, anti-virus controls, firewall configuration, and scheduled and automatic backups to protect against data loss or theft.

Researchers possess a strong sense of ownership for their data and consequently often manage their own computers. Laptops, Personal Digital Assistants, removable hard drives, “jump” or

“thumb” drives, CDs, DVDs and other portable devices and removable media are very convenient to ensure your data is always at your fingertips. External hard drives are a cost effective and convenient way to back up your data. However all of these devices require encryption solutions if used to store Restricted or Sensitive data (e.g. identifiable information).

What qualifies as an adequate data disposal plan?

Data disposal plans should outline when and how data collected in a study will be destroyed, including shredding of paper documents, erasing of data on computer drives, and disposal of audio- and videotapes. Federal regulations require that research data and related documents such as consent forms be kept in a secure location for a minimum of three years.

When a PI obtains IRB approval, who else is allowed to access the data that has been collected? Should these people be explicitly named in the research proposal?

In most cases, only the researcher and other key research personnel should have access to study data. The research proposal and consent forms must specify who will have access to collected data and the IRB must approve providing access to persons outside of the research team. Consent forms must include a signature line or check box for research participants to consent to persons outside the research team using the data. Providing access to data to persons outside the research team *after a study is concluded* requires re-consenting of the study participants.

Anonymity and Confidentiality

How can researchers provide anonymity for research subjects when the study design calls for a pre- and post-test?

Researchers who conduct studies in which participants are tested before and after a treatment have a legal and ethical need to preserve the participants' anonymity, while matching the initial test responses to the follow-up test to obtain the strongest statistical power, so at some point they must know the identity of the respondents.

Most researchers handle this data collection problem by numbering the tests with unique identifiers -- giving identical numbers to the pre-test and post-test documents of each participant -- and keeping some "master list" with names matched to questionnaire I.D. numbers. The master list is kept secure by the researcher in a separate location from the pre-tests. After the post-test is administered to the group, the list is destroyed, the matching tests are paired and the respondents remain anonymous.

Another innovative method for preserving anonymity when pre- and post-test surveys are administered was used in a recent study in NYC schools. It involved handing out pairs of questionnaires with the same IDs. Each student answers the pre-test and writes his/her name on an envelop containing the post-test. The pre-tests were collected by the researcher and stored in a secure place. The as-yet unanswered post-tests, in their envelopes, were kept at the schools. Two months later, the envelopes were distributed to the children, who threw away the envelopes with their names on them and filled out the questionnaires inside.

When is it mandatory to have a breach of confidentiality/privacy clause in consent/assent forms?

A consent/assent form must explicitly alert research participants to any settings/situations where the confidentiality of the data being collected could/will be out of the researcher's

control. For example, in a focus group, the researcher can guarantee confidentiality on his/her own behalf, but cannot guarantee the confidentiality of focus group participants. Additionally, where applicable, consent forms should also include some variant on the following standard language related to participants' privacy: *All of your survey and interview responses are strictly confidential, with the following exception: the researcher is required by law to report suspicion of harm to you, to children, or to others to the appropriate authorities.*

Continuations and Changes in the Design of Research Approved by the IRB

What procedure must researchers follow for multi-year studies?

Researchers whose projects will extend beyond the year for which IRB approval has been granted must apply for a continuation six weeks before the approval will expire using the DOE's IRB online submission form. They also must fill out an interim research report that documents activities that took place during the previous year and provides a rationale for any revisions to the research design that are proposed in the continuation request. The revised proposal and related documents, such as consent forms, must be submitted to the IRB for review before a continuation can be approved.

What procedure must researchers follow if there is a deviation from the research protocol?

Deviations must be reported within 48 hours of when they occur. The researcher must suspend the research until he/she can assure the IRB that the deviation will not re-occur or until they submit an amendment to the original research design incorporating the deviation into their original design. Such amendments must be reviewed and approved by the IRB.

What procedure must researchers follow if there is a violation from the protocol or an adverse event?

Violations and adverse events must be reported immediately and research suspended until the IRB determines whether the research should be discontinued. IRBs are required to report adverse events to OHRP.

What procedures must researchers follow if they wish to amend (change) some aspect of the research design?

Changes (referred to as amendments) in research design that will take place within the approval year must be reported to the IRB and reviewed for approval. Changes in research design that are planned for the future (in the case of multi-year projects) should be included in continuation requests.

Fingerprinting

Who needs to be fingerprinted and how do they go about doing so?

All researchers who will be going into NYC Public Schools need to be fingerprinted in order that their background can be checked. All Key Research personnel must be fingerprinted at the NYC DOE Fingerprinting Office at 65 Court Street, Brooklyn. **FINGERPRINTING THAT IS DONE AT OTHER LOCATIONS/FACILITIES (IN NYC, NY STATE, OR OTHER STATES) WILL NOT BE ACCEPTED. The DOE IRB revised its fingerprinting procedures in October 2013.** Principal Investigators and all other key research personnel (research team members who will enter NYC public schools) may no longer be fingerprinted without first being registered in the DOE IRB Personnel Eligibility

Tracking System (PETS) roster. **Detailed instructions for registering will be included with the researcher's approval letter.** After completing the registration process, researchers will be notified by email that they can go to 65 Court Street to be fingerprinted Monday-Friday (except on holidays), between 9am-5pm. An appointment is not necessary.

Principal investigators must produce their IRB approval letter, a picture ID, and their social security number when they appear for fingerprinting. In addition to their ID and SS# and a copy of the PI's approval letter, other key research personnel must provide a letter from the PI that identifies the researcher as a member of the project team and guarantees that the PI will be responsible for that person's conduct in NYC schools. Researchers must wait 72 hours after they have been fingerprinted before entering schools. The cost of fingerprinting is \$115.

The DOE recognizes that researchers from outside the U.S. are unlikely to have a social security number; however, the new procedures require that they must complete the DOE IRB PETS Roster registration process and be fingerprinted (after their research proposal is approved). In addition to being fingerprinted, researchers from outside the U.S. must include the following documentation with their research submission to the DOE IRB:

- (1) a letter signed and notarized by a DOE-approved governmental authority in their country (e.g., consulate or police department) documenting that the researcher does not have a criminal record;
- (2) a letter from the administrator of any school in which they will be conducting research stating that the administrator or his/her designee will accompany and be liable for the researcher's activities while in the school.

When does fingerprinting /background information expire?

The DOE maintains a database of all persons who are fingerprinted for the purpose of going into NYC Public Schools. According to current DOE policy, researchers are listed as 'eligible' as long as they continue to be actively involved in conducting research in NYC public schools. Researchers who are discovered to have engaged in criminal or other prohibited behaviors become 'ineligible' and thereafter are not allowed to enter schools.