

Guidelines for Obtaining Authorized Consent to Conduct Research within the Fresno Unified School District

Fresno Unified School District (FUSD) recognizes the value of high-quality research for improving education and serving the needs of future generations of students. On the other hand, FUSD has legal and moral obligations that require oversight of research activities conducted with district resources such as data, facilities, employee time, and access to students. These obligations include **Protecting**:

- Students and employees from risk of harm, violations of rights, and losses of privacy
- The educational process from unwarranted distractions and interruptions
- Public resources including data from misappropriation for private or unjustified use

Research conducted in FUSD or with its resources **must be justified in terms of the anticipated benefit to the district and not merely to the advancement of knowledge**. FUSD encourages research aimed at **Improving** the following areas:

- Educational outcomes across all or selected student groups
- Design and delivery of services that promote equitable learning
- Management of the school environment
- Parent involvement in education

Research should be designed to answer well-formed research questions of educational importance, and it should use methods that are appropriate to the research questions. Elements of the research design, including the theoretical framework, hypotheses, sample selection, instruments, and analysis plan should support the goals of the research, and it is the responsibility of the researcher to communicate these things clearly in the proposal. Whether you are surveying one teacher or 100 students, you are required to submit your proposal to our IRB Committee. Even research that imposes no risks may be rejected by the review committee if they judge it to be poorly designed, described, or justified. At the conclusion of your research, you are required to submit your completed report to the *Department of Analysis, Measurement, and Accountability*.

FUSD IRB Committee approval does not impose any obligation on any person, school, or office to cooperate with researchers. The burden on respondents should not be excessive. However, time has very different values in different contexts, and only participants can decide whether the cumulative burden on them is acceptable. Researchers bear responsibility to inform potential respondents of the anticipated benefits and burdens in obtaining their consent. Of course, **no research may be conducted at a school site without the informed approval of the principal. Please be aware all data collection with staff (outside of observations) must take place outside of paid time and that staff should be apprised of this fact during recruitment. All data collection with students (other than observations) must take place outside of instructional time.**

Depending on the research design, substantial time and effort may be required for staff to provide requested data with the appropriate selection and matching of records and concealment of personal identities. If you request student-level data or substantial district time, a Memorandum of Understanding (MOU) will be required. Approval of proposal will take this into consideration.

FUSD IRB Committee Application Review Dates

The FUSD IRB Committee only reviews applications on the following dates:

- September 15, 2023
- November 17, 2023
- January 19, 2024
- March 15, 2024
- June 3, 2024

It is crucial that you plan accordingly and submit your application prior to our review dates in order to ensure that you meet your program deadlines.

The Application Review Process

A. GENERAL DIRECTIONS

Please review the following checklist of online application to conduct research form. The following materials are required for research proposal submission.

The link to the online submission form is: <https://tinyurl.com/FUSD-IRBApplication-Form>

You will not be able to save your submission unless all required fields are completed. You are unable to save information to edit at a later time. **This form must be completed before your application will be considered for approval.**

Please contact Ricky Vang the IRB Committee Liaison, if you have any questions. He can be reached at (559) 457-3904. His email is Ricky.Vang@fresnounified.org. If you are sending an email with a question about the online submission form for a proposal you already submitted, please title the subject of the email as follows:

Your Last Name, Research Proposal Title, Reason for Contact (in 5 words or less)

B. CHECKLIST FOR ONLINE RESEARCH PROPOSAL SUBMISSION REQUIRED ITEMS

All fields are required on the online research proposal submission form.

- **Submission Date**
- **Title of Project**
- **Statement of Purpose**
- **Type of Application**
 - If project is for a Doctoral Dissertation or Master's Thesis, please include a letter of sponsorship from the faculty advisor. This letter should have your faculty advisor's contact information and should be included in the Appendix.
 - Other: Research may sometimes be sponsored by a for-profit entity such as a textbook publisher, or a non-profit agency with a primary mission other than scholarly research. Because of the potential for biased outcomes, inappropriate incentives, and misappropriation of public resources, the proposal will be held to an extremely high standard of validity and justification in terms of benefit to the district.
- **Name of Principal Investigator**
- **Organization/University**
- **Email Address**
- **Phone Number**
- **Primary Contact Name** (If different than Principal Investigator)
- **Primary Contact Email** (If different than Principal Investigator)
- **Proposed Project Start Date**
- **Report Submission Date to FUSD IRB** Please provide a date by which the *Office of Research, Evaluation, & Assessment* can expect to receive your final report of your research.
- **FUSD Employee** (Please indicate 'yes' or 'no' on the drop-down menu.)
- **Name of school(s) you intend to conduct your research at**

C. CHECKLIST FOR ONLINE RESEARCH PROPOSAL SUBMISSION REQUIRED ITEMS

All individuals interested in conducting research within FUSD must email a proposal to Teresa Bejarano, the IRB Committee Liaison, at Ricky.Vang@fresnounified.org.

All proposals must contain the following items:

- ┌ **Proposal Title**
- ┌ **Statement of Purpose** State clearly what you intend to accomplish with this research.
- ┌ **Research Questions/Hypotheses** Please briefly state the research questions you plan to address, along with any necessary hypotheses. Hypotheses are not required for qualitative research studies.
- ┌ **Methods Design** Please describe the methods that you plan to use and how they will be used to address your research questions.
- ┌ **Methods Sampling and Recruitment** Please describe the target population, sampling frame, and selection procedures.
- ┌ **Methods Measures** Please describe the instruments of measurement you plan to use. Please include results from pilot testing and/or other evidence for the validity of the instruments. Although conditional approval may be granted on the basis of preliminary instruments, the complete and finalized instruments must be submitted before the project can begin.
- ┌ **Methods Data Collection** Please describe the method of data collection and procedures you plan to use.

- ┌ **Methods Type of Data Collection** Please describe the type(s) of data collection methods, such as, Survey, Interview, Focus Group, Classroom Observation, Shadowing, Secondary Data Analysis, etc.
- ┌ **Analysis** Please describe your anticipated analysis plan, including specifics regarding your treatment of the data, statistical or otherwise.
- ┌ **Human Subjects Protections** Include an explanation of how and where your data will be stored as well as how and when you plan to dispose of the data after your study is completed. Also describe the safeguards that exist (or will be implemented) to ensure that the data will be used solely for the purpose of this research project. Describe how the identity of the subjects and data will be protected. Please specify the names and affiliations of individuals who will have access to the data, either electronically or through printed reports. Note that access must never be given to anyone other than those approved here.
- ┌ **Burden to the District** Please describe the burden that your research will have on the district. The following is required of all research proposals that involve human subjects:
 - The research proposal will **clearly state the number of participants**, specifying the role of each group of participants. For example: Twenty math teachers in four schools will be observed, six principals will be interviewed, and forty students from five classrooms will be surveyed.
 - The research proposal will **clearly state the amount of time to be requested from each participant** and when the interaction will occur. For example: Math teachers will be observed for four class sessions during the first two weeks in March.
 - It is the district's interest to minimize the human costs of research. Therefore, the research proposal will provide a clear rationale for the number of participants, the number of contacts, and the total time required by each participant.
 - The research proposal will include a statement of how research participants are to be compensated for their involvement, if at all.
 - Instructional interventions must be approved by the Office of Curriculum and Instruction. Instructional interventions designated for the purpose of a master's thesis or doctoral dissertation will not be accepted.
- ┌ **Benefit to the District** The proposal must identify the benefits that the research is expected to provide to the district in terms of the following areas of interest:
 - Improving educational outcomes across all or selected subgroups of students
 - Improving the design and delivery of services that promote learning
 - Improving the management of the school environment
 - Improving parent involvement in education
- ┌ **Description of Sharing Results with Site(s)** Please include how and when results will be shared with the participating site(s).
- ┌ **Date of Completed Report** The proposal must identify the date by which the IRB Committee can expect to receive a final report of the completed study with its results and recommendations.

Please keep in mind that for research taking place at a school site, final approval rests with the site principal or program administrator and impacted classroom teachers. The approval of the research application at the district office does not obligate any site or individual to participate in any research.

If the research involves contact with students other than normal educational practices, student and parent consent forms must be included. Note that even with parental consent, minors in school settings must be given the opportunity to assent or refuse to participate in research activities other than routine educational practices.

If you are requesting access and/or the release of information on individually identified students:

- You must include a letter of approval for research with human participants (human subjects) from your institution's internal review board (IRB) for research with human subjects.
 - **If project has not yet received IRB approval from your Institution**, please include a letter of sponsorship from the faculty advisor. This letter should have your faculty advisor's contact information
- You must complete a Memorandum of Understanding (MOU)
- You must also obtain active parental consent before you collect or obtain access to individually identifiable data. Please submit consent/assent forms with your research application for review.

Once You Have Received FUSD IRB Committee Approval

Note that once research approval is granted, there can be no changes in research procedures, protocols, or instruments without prior written approval from FUSD IRB Committee.

- Before starting any research activity, the principal researcher must submit a copy of their research approval letter from FUSD IRB to all participating school sites' administrators.
- If the research involves contact with students, Signed Consent Forms for Release of Pupil Information and/or Participation in Research and signed Student Assent Forms must be filed at the school site with the principal or his/her designated representative **at least two weeks** prior to collecting data for each student.
- Researchers' data requests, once approved, will be fulfilled by the *Department of Analysis, Measurement, and Accountability* personnel, and provided with a timeline determined by the Department.

D. ADDITIONAL DOCUMENTS REQUIRED

Appendices, Informed Consent Form Sample(s), Measurement Sample(s), and Human Subject Protection/IRB Certification

Please also email Ricky Vang the following documents:

- **Advisor Letter:** Please include a letter from graduate student's advisor stating that the advisor has read the proposal and approves it (if applicable).
*Not required field.
- **Informed Consent Form Sample(s):** Provide the sample(s) of consent forms
- **Measurement Sample(s):** Provide the samples of any surveys, interviews, focus group guidelines, etc. that you intend to use.
- **Human Subject Protection / IRB Certification** Applicants are required to provide evidence that (1) the proposed study has been reviewed and approved for human subject protection purposes by another institution such as a university Institutional Review Board (IRB) or that (2) all members of the research team have satisfactorily completed the National Institute of Health (NIH) or the Collaborative Institutional Training Initiative (CITI) tutorial on human subjects' protection. Information on the NIH tutorial is available at: <http://phrp.nihtraining.com/users/login.php> . Information on the CITI tutorial is available at: <https://about.citiprogram.org/series/human-subjects-research-hsr/>

Institutional IRB Required Documents

Before research can begin, the principal researcher must provide the following to the FUSD IRB Committee:

- The principal researcher must submit a copy of the institutional IRB submission along with the FUSD proposal and provide the FUSD IRB Committee with a copy of the institutional IRB approval letter before beginning research.
- In the case of research exempt from IRB review, the proposal must include documentation from the institution clearly delineating reasons for such an exemption.
- In the case of research not affiliated with any institution subject to IRB requirements, the proposal must include persuasive evidence that the researcher has carefully considered the potential risk to human subjects, especially students and families, and has ensured the appropriate protections in the research design.

E. AFFIDAVIT AGREEMENT

We require that all researchers sign an Affidavit Agreement. This agreement establishes that your research activities within Fresno Unified School District are in compliance with existing legal and ethical codes. It further establishes that the research you perform will not differ significantly from the research proposed, and that you are to provide the IRB Committee with an executive summary of your findings. Violation of this statement of agreement will be considered a breach of contract.

Legal and Ethical Considerations

A. LEGAL PROTECTIONS

As a school district, we must require that all research within the District adhere to federal regulations regarding family and pupil rights, privacy, and protection. In addition, we must require that all research within the district adhere to federal guidelines regarding the protection of human subjects. Although we rely to an extent on approval from your organization's IRB to ensure you have taken all necessary steps to protect human subjects involved in your research, our own guidelines may go above and beyond those of your IRB. Therefore, each researcher should become familiar with these guidelines before submitting a proposal to our committee.

Federal Policy for the Protection of Human Subjects (34 CFR Part 97) This policy is found in the regulations of various departments, but the Department of Education version differs slightly from the DHHS version often cited by researchers and institutions. It can be found at <http://www.ed.gov/policy/fund/reg/humansub/part97.html>

One subsection in particular should be noted, Additional ED Protections for Children Involved as Subjects in Research: <http://www.ed.gov/print/policy/fund/reg/humansub/part97-3.html>

Note that research involving “normal educational practices” is exempt from IRB review under 34 CFR Part 97.101(b)(1). However, 34 CFR Part 97.101(b)(2) makes it clear that survey and interview procedures are not included in the definition of normal educational practices. For such procedures, what is required for exemption from IRB review is that information be recorded in a such a manner that human subjects cannot be identified, and that any disclosure outside of the research cannot reasonably be damaging to the subjects’ financial standing, employability, or reputation.

Because of the special relationship that schools have with students and their families, the Family Educational Rights and Privacy Act (FERPA: 34 CFR Part 99) and the Protection of Pupil Rights Amendment (PPRA: 34 CFR Part 98) impose stricter requirements on the District than those imposed on researchers by IRB review or its exemption. These rules may be found at

PDF:

<http://www.ed.gov/policy/gen/guid/fpco/pdf/ferparegs.pdf>

HTML:

<https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

Before research may begin in FUSD, one of the following must be submitted to the FUSD IRB Committee:

- The researcher must submit a copy of the IRB submission along with the FUSD proposal and provide the FUSD IRB Committee with a copy of the institutional IRB approval letter before beginning research.
- In the case of research exempt from IRB review, the proposal must include documentation from the institution clearly delineating reasons for such an exemption.
- In the case of research not affiliated with any institution subject to IRB requirements, the proposal must include persuasive evidence that the researcher has carefully considered the potential risk to human subjects, especially students and families, and has ensured the appropriate protections in the research design.

B. ETHICAL PRINCIPLES

We expect researchers to abide by the code of ethics for their respective disciplines. As a general guideline, we offer the following principles. These principles have been adapted from the American Psychological Association's (1992) Ethical Principles of Psychologists and Code of Conduct. The entire code is available at <http://www.apa.org/ethics/code.html>.

Familiarity with Ethics Code. Researchers have an obligation to be familiar with applicable ethics codes and their application to research. Lack of awareness or misunderstanding of an ethical standard is not itself a defense to a charge of unethical conduct.

Compliance with Law and Standards. Researchers plan and conduct research in a manner consistent with federal and state law and regulations, as well as professional standards governing the conduct of research, and particularly those standards governing research with human participants.

Informed Consent to Research. Researchers use language that is reasonably understandable to research participants in obtaining their appropriate informed consent (except when consent is waivable). Such informed consent is appropriately documented. For persons who are legally incapable of giving informed consent, researchers nevertheless (1) provide an appropriate explanation, (2) obtain the participant's assent, and (3) obtain appropriate permission from a legally authorized person, if such substitute consent is permitted by law.

Minimizing Intrusions on Privacy. In order to minimize intrusions on privacy, researchers include in written and oral reports, consultations, and the like, only information germane to the purpose for which the communication is made. Researchers discuss confidential information obtained in schools, or evaluative data concerning students, teachers, and other research participants, only for appropriate scientific or professional purposes and only with persons who are clearly concerned with such matters and have pledged to uphold confidentiality.