

# Guidelines for Conducting Research in Hillsborough County Public Schools

# **Prepared for:**

Department of Assessment and Accountability Division of Academic Services

Hillsborough County Public Schools Tampa, Florida

# The School Board of Hillsborough County, Florida

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Hillsborough County Public Schools (HCPS, the District) is the nation's seventh largest school District, with over 200,000 students and 260 traditional and charter schools. Because of its highly diverse geography and demography, HCPS offers a wide range of contexts for conducting educational research and program evaluations. As a result, the District receives many requests to conduct research from a variety of individuals and organizations. This manual sets forth the guidelines and practices for those requests.

# Purpose of the Research Application and Review

The School Board of Hillsborough County Public Schools (the Board) supports education-related research and program evaluation studies that apply rigorous and systematic procedures to get valid data relevant to the implementation and effect of education programs and to advance public education for District stakeholders. The Board further recognizes that individuals and agencies may ask for permission to conduct research in the school system. However, the Board also acknowledges its responsibility to ensure that research conducted in the school system is of high quality, safeguards the privacy of individuals, furthers the goals of the District, and minimizes interruptions to the instructional program.

The policies and procedures within this manual apply to individuals and entities who would like to conduct research and/or evaluation activities in the District, or who would like to receive and use District student data and/or staff data for research or evaluation purposes.

The Superintendent or his designee must approve all research and program evaluation studies. Internal and external applicants seeking approval to conduct a research project within the District must go through the official review process.

The research application review process provides a mechanism to ensure that the following District expectations are met:

The research is significant and aligns to the <b>District's stated mission</b> .
The potential benefit to the participants and/or the District outweighs the nature and
interruption.

The rights of the proposed research subjects within HCPS are protected. The US
Department of Education has established regulations governing all education
institutions that use human subjects in research activities (see Federal Policy for the
Protection of Human Subjects, Protection of Pupil Rights Act, Family Rights and
Privacy Act of 1974, Family Education Rights and Privacy Act of 1974, Additional
Protections for Children Involved as Subjects in Research, Health Insurance Portability
and Accountability Act of 1996 for more information). Research proposals that do not
align with these laws are prohibited from taking place in the District.

#### Reasons for Research and Definitions

To be considered, research must fit into one of four categories:

- 1. Academic Study, Presentation, or Publication (peer-reviewed journal or academic text);
- 2. MA Thesis or Ph.D./Ed.D. Dissertation/Degree Program;
- State or National Study (other than reporting requirements mandated by the state or federal government);
- 4. Program Evaluation

"Researchers/Study Investigators" include:

- Individuals not employed by Hillsborough County Schools (HCPS) staff or agencies not contracted with HCPS requesting to conduct research;
- HCPS staff requesting to conduct research for purposes or uses beyond their District role;
- HCPS staff planning to conduct research within their District role that involves collaboration with non-HCPS partners or funding agencies.

#### Institutional Review Board

Federal and State Law mandates that any research that involves human subjects must have completed an Institutional Review Board (IRB) process and received its approval. The IRB is an administrative body established to protect the rights and welfare of human research subjects recruited to take part in research activities conducted under the auspices of that with which it is

affiliated. To accomplish this purpose, IRBs use a process to review research protocols and related materials (e.g., informed consent documents and investigator instruments) to ensure protection of the rights and welfare of human subjects of research. Human subject is defined as: a living individual about whom an investigator conducting research gets:

☐ data through intervention, or interaction with the individual, or ☐ identifiable private information.

Hillsborough County Public Schools also requires every human subjects/participant research project undergo review and approval by **BOTH HCPS** Review Board (RB) and a Formal IRB. The HCPS RB reviews all research applications seeking students, staff, administrator, and parent access. This includes but is not limited to traditional, electronic, and PeachJar solicitation. If an applicant is affiliated with an institution of higher learning, submission of IRB approval from the institution with which they are affiliated must be submitted prior to approval from HCPS for the collection, analysis, and/or publication of data. For those applicants who do not have an institution of higher learning attached to their research HPCS requires an external IRB be conducted by an accredited Human Research Protection Program. HCPS reserves the right to request additional information from the researcher including, but not limited to, a request of additional material or review of protocols and instruments as well as clarifying information from an applicant regarding a request. HCPS may refuse to approve a study (regardless of if external IRB approval) if it is deemed the study might negatively impact the physical, emotional, or physiological health, education, nutrition, or general well-being of students, faculty, staff, and or other stakeholders. All RB submissions are reviewed in the order received (new studies, amendments, continuing reviews, and responses to contingencies) except for current Hillsborough County Public Schools employees. The application of a current HCPS employee will be expedited to the front of the queue for review. External to HCPS studies will not be "pulled out of queue" however, the RB may be able to accommodate funding related deadlines with notice. HCPS RB reserves the right to determine if a study is expedited.

**HCPS RB Review Categories:** 

There are two (2) categories for review (expedited and full board):

- 1. Expedited reviews are conducted by at least one reviewer and the probability and magnitude of physical or psychological harm that is normally encountered in the daily lives of adult human subjects. Expedited reviews can involve research on individual or group characteristics or behavior (including, but not limited to, cognition, research on perception, motivation, identity, language, communication, cultural beliefs or practices, and social behavior) including research employing survey, interview, oral history, focus group, program evaluation, human factors evaluation, or quality assurance methodologies. Expedited reviews are generally granted to research awarded external IRB approval or seeking data set information. Expedited research categories include but are not limited to:
  - Education research
    - Research conducted in established or commonly accepted educational settings, involving normal educational practices that are not likely to adversely impact students' opportunity to learn or assessment of educators.

#### Example:

- teaching or comparing a curriculum or lesson.
- Surveys, interviews, observations, educational assessments
  - Research involving the use of educations assessments (aptitude, diagnostic, achievement, cognitive).
    - ☐ Recorded information **cannot** readily identify the participant (directly/indirectly) **or**
    - Any disclosure of responses outside of the research would **NOT** reasonably place participant at risk (criminal, civil liability, financial, employability, education advancement, reputation).

## Example:

- Surveying teachers about a technique or an outcome
- Interviewing participants about a best practice or style

		Research seeking existing data from HCPS involves masked
		information which <b>cannot</b> readily identify the participant
		(directly/indirectly), securely containing and subsequently
		destroying the data by an approved means.
	Exa	ample:
	•	District level F.A.S.T., FSA, and iReady data for students
		grades 3-8 for the previous 3 years.
o Be	nign Bel	navioral Interventions
	o R	esearch involving Benign Behavioral Interventions through
	vei	bal, written response, (including data entry or audiovisual
	rec	oding) from participants who prospectively agree and ONE of
	the	e following met:
		Recorded information cannot readily identify the
		participant (directly/indirectly) or
		Any disclosure of responses outside of the research would <b>NOT</b>
		reasonably place participant at risk (criminal, civil liability,
		financial, employability, education advancement, reputation).
	Exa	ample:
	•	Being exposed to a stimulus such as color (at safe levels)
	•	Performing cognitive tasks under various noise conditions
2. Full Board R	esearch	review procedures involve research that does not hold an
external IRB a	pproval	, involves a <i>greater</i> than minimal risk procedures, <b>or</b> involves:
☐ vulner	able po	pulations such as <b>children;</b>
☐ The IR	≀B staff,	committee member, or designee, determines risks are
greate	rthank	minimal;
☐ decep	tion	
1.100	,	
addition to IRB appro	ovai, all	research applicants are required to submit within the study

Existing Dataset

application, a summary, rationale, lit review/theoretical framework, purpose, research questions,

In

data collection methodology, analytic plan, burden, and benefit to District, consent forms, any incentive(s), data procedures, and study anticipated timeline.

HCPS RB and Research Review Committee approval does not guarantee that the research will be permitted within a school. Rather, it protects participants should they choose to engage in and with the research presented to them. Principals of designated schools will ultimately accept or decline to take part in a study. RB approval does not express endorsement of the research being conducted. All research in schools must be done in cooperation with the principal or their appointed representative to ensure that the research will not disrupt student learning or school activities. Participation of teachers and students/families is voluntary.

# Methodology

"Research" comprises various evaluation, measurement, and inquiry activities that include, but are not limited to:

- systematic investigation (including research development, testing and/or evaluation)
   designed to develop or contribute to general knowledge;
- collecting and analyzing information aimed at discovering unknown or additional facts and their correct interpretation to draw conclusions;
- quantitative and qualitative study activities such as observations, interviews, case studies, ethnographic analysis, analysis of written materials, secondary analysis of data, achievement testing, surveys, experimental designs to examine causal relationships, product testing, analysis of cost, and management records.

#### Fingerprinting and Badging

All researchers are considered volunteer vendors and as such, may, through the course of their work, have *unsupervised* contact with students. All MUST, therefore, get fingerprinted and badged through the HCPS Human Resources office. This yellow badge must always be worn on an HCPS school or site. It is the researcher's responsibility to work with the principals at the schools where research is taking place to ensure that either the researcher will always have

supervision, or that the researcher goes through the proper fingerprinting and badging procedures. Click <a href="here">here</a> for more information.

# Overview of the Research Application

The Research Review Committee (RRC) must review and approve applications to conduct research in the Hillsborough County. The RRC is composed of highly qualified District Specialists in the areas(s) of interest. All forms are to be submitted *prior* to review by the RRC. HCPS reserves the right to withdraw support for any research study or data request that defaults on the policies or conditions set forth in the Research Procedures Handbook and Research Review Committee decision letters. Failure to adhere to these communications may result in future research/institution relationships.

\*\*Please note the changes to our research application schedule effective July 1, 2023\*\*. Hillsborough County Public Schools is committed to meeting the instructional needs of students. Therefore, observations and disruptions to learning are not permitted. Research and data requests are considered and reviewed during all five points during the calendar year.

**Application Schedule** 

Submission	Due Review Period	Drainated Deanance	
Midnight	Review Period	<u>Projected Response</u>	
August 1	Month of August	September 1st	
October 1	Month of October	November 1st	
December 1	Month of December/January	January 20	
February 1	Month of February	March1st	
April 1	Month of April	May 1st	

<sup>\*\*</sup> While the District will strive to provide researchers with an application decision by the projected dates listed, there may be delays due to unforeseen circumstances. Data requests that take more than one hour to fulfill are charged with an hourly rate of \$125.

# **Application Process**

Applicants desiring to conduct research in Hillsborough County Public Schools must have an active application with supporting documents on file. Requests to conduct research in Hillsborough County Public Schools are accepted all year long. However, research may not be conducted in schools during certain times of year:

the beginning of the year (August);
 during testing times (primarily September- October, January-February, April -May);
 at the end of the year (May)

Certain schools may be "off limits" because of their involvement in state activities, grants, or other time-consuming projects. Refer to <u>Research and Evaluation website</u> for specific dates during which school, faculty, and student access will not be granted.

\*\* - While the District will strive to provide researchers an application decision by the projected dates listed, there may be delays due to unforeseen circumstances.

# Research Review Process Steps

Though Research Requests (RR) are submitted yearlong, complete applications will only be reviewed at the times listed above. The review process involves:

- 1. Complete online application and provide requisite materials via email by due date.
- 2. Review of application for completeness
- 3. RRC reviews the request and accompanying materials
- 4. HCPS solicits schools using researcher supplied Principal Flyer
- 5. Researcher is sent formal decision letter
- 6. 60-30 days prior to end of planned research, applicant will receive a Check-In
- 7. At the end of the study, a summary of the findings must be submitted to the RRC<sup>+</sup>

#### Internal Applicants

Applicants who are current Hillsborough County Public Schools employees and wish to conduct research follow the same procedures as applicants who are not currently employed by HCPS with the exception that your application is expedited and moved to the front of the review line.

#### Checklist and Forms

Applicants who are *not* current Hillsborough County Public Schools employees and wish to conduct research should complete two (2) application elements, an online application and email requisite materials.

*Online application:* **Research Request Application** will ask for:

<sup>\*</sup> Incomplete applications will NOT be considered for review.

<sup>+</sup>Failure to submit findings may jeopardize the future working relationship between the researcher and Hillsborough County Public Schools.

Summary-Using non-academic language, address the following areas:

- 1. Why is this study necessary and important now.
- 2. Who and how many participants are needed for this study (i.e., 6 middle school math teachers and 150 of their lowest FSA Math scoring students across 3 different schools).
- 3. How do you plan to conduct the study- (include group sample sizes, frequency of treatment, content area impacted- i.e., students will be in groups of 4 receiving twice weekly, 30-minute, small-group, intervention treatments from the researcher in the library during math class for 10 weeks.
- 4. Describe your research variables and experimental treatment (where applicable)- a study specific math computation skills pretest and posttest will be administered to the students. Half of the students will receive this math intervention to aide in computation skills while the other 1/2 will receive instruction as usual from the classroom teacher.
  - 5. What will Hillsborough County Public Schools gain from this study; and
- 6. What strain will this study place on the students, teachers, administrators, etc., of Hillsborough County.

Rationale - state what you intend to accomplish with this research.

Literature review/Theoretical framework/Purpose - provides a brief statement of the theoretical basis for your study from prior published research (include reference citations in APA format) and what contribution (purpose) your work is expected to make to your field.

Research question/hypothesis - briefly state the research questions you plan to address, along with any necessary hypotheses.

Data collection methodology (sampling procedures, secondary data request) - describe, in detail, the target population (i.e., grade level, number of schools, specific schools, etc.), sampling frame, and selection procedures for the proposed research.

Analytic plan (how are you analyzing the data) - describe your expected analysis plan, including specifics regarding your treatment of the data, statistical or otherwise.

Detailed secondary data request (if applicable) - provide a detailed description of the variables you wish to include in your study, be as specific as possible. Please avoid broad or generic statements such as "demographic information" or "test results." Be sure to include schools, special programs, or departments, where applicable.

Burden and Benefit to the District- describe the burden that your research will have on the District – this applies for research with human subjects and secondary data requests. Depending on the research design, substantial time and effort may be required for staff to provide requested data with the selection and matching of records and concealment of personal identities. For proposals concerning human subject research, the proposal will providea clear and logical rationale for the number of participants, the number of contacts, the total time required by each participant and when then the interaction will occur. The research proposal will state the number of participants, specifying the role of each group of participants.

An example of the burden might read Seventy-four (74) math teachers in twenty-five (25) schools will be interviewed, sixty-five (65) students from seven (7) third grade classrooms will be surveyed, and four (4) principals from five (5) schools will be observed during the first two (2) weeks of February.

Consent- identify if you plan to use passive or active participant consent and why you have selected that method.

Student/participant incentives - describe any participant incentives. Note, pursuant of 3210 (13) of the Standards of Ethical Conduct for Instructional Staff, HCPS employees, "... accept no gratuity, gift, or favor that might influence professional judgment"

Data Procedures - detail the data security and data disposal plan. Data security plans should outline how all hard copy and electronic data are securely stored to prevent unauthorized access, disclosure, or loss. Data disposal plans should provide detail about when and how data collected in a study will be destroyed and made irretrievable (for digital recordsmaking sure to clear, purge and destroy data as warranted by the data type, risk of disclosure, and impact if that data were to be disclosed without authorization). If you are conducting federally tied research, regulations require that the data and related documents such as consent forms be kept in a secure location for a minimum of three years.

An example of data procedures might read: Only numbers which will be randomly assigned using a random numbering iPhone application will identify participants. Consent forms and data will be stored electronically on an external storage device. The device will be kept in a locked drawer to which only I have the key. At the end of two years, all files will be removed, deleted, and erased from both the thumb drive and the computer upon which the data was viewed.

Timeline (identification, recruitment, data collection, data analysis, completion, and write-up) - must include start and end date of all research activities and data collection and/or expected dates for delivery of secondary data. Researchers/study investigators should also outline the time necessary to complete data collection and write-up. Please note, if research activities exceed <u>one year beyond date of proposal approval</u>, this should be discussed during Check-In and an extension must be submitted to RRC.

Requisite materials:

<u>All items listed below</u> should be attached as *one* email to: <u>ResearchRequest@hcps.net</u> . Be sure to include your name and research title in the Subject field of the email.

Submit a copy of the Informed Consent(s)/Assent(s) to be used- attach copies of informed consent forms that comply with Family Educational Rights and Privacy Act (FERPA) and Protection of Pupil Rights Amendment (PPRA) guidelines. See "Consent Form" below for more information pertaining to requirements. Completed consent forms must be reviewable upon request.

Submit a copy of your study Flyer for Principal solicitation

Submit a copy of your FERPA training certificate (Institution, CITI, NIH, HHS, etc.)

Submit a copy of the Participants Letter of Invitation

Submit a copy of IRB approval letter from your University/Institution (if applicable)

Submit a signed copy of Access and Use of Confidential Data (Form A)

Submit a signed copy of **Data Sharing Agreement (Form C)** 

Submit a copy of **ALL** measures (focus group questions, survey, etc.) \*

For thesis/dissertation/capstone research,

Submit a letter of approval from committee chairperson or graduate faculty advisor

\* Incomplete applications will NOT be considered for review.

# Successful Applicant

A successful applicant will be issued a letter containing the conditions of the approval and an approval number. The approval number should be used in all communications to identify the research as approved by the Research Review Committee (RRC). The approval of the committee does not constitute an endorsement of the research. It is a permission to request the *voluntary* cooperation in the research of individuals associated with the HCPS.

A copy of the letter should be provided to the principals of the HCPS schools involved in the research. If the research activities will involve the staff/students at a school during school hours, *the approval of the principal must be secured* before the voluntary cooperation of the staff/students is sought.

#### Check-In

All research permissions end one year after the date on which it was approved. Check-ins serve multiple purposes. The most poignant is to "Check" on the research being conducted between 60 and 30 days prior to the scheduled end of the research request. The RRC will remind the researcher of the agreed upon timeline, assurances, expectations of all parties, and collection. Check-ins also serve as a way for the researcher to ask formally for an extension and/or principal to reject ongoing research. Principals are under no obligation to continue allowing research in their school should they deem it a distraction. Extensions to approved research go through the same process as initial requests. This is done to ensure the continuation of research in not intruding on the time, instruction, and practices of staff, students, schools, or the District.

At the completion of the research, *the findings must be submitted* to the RRC. Research findings *may not be published or presented without approval*. As a condition of the approval, Research and Evaluation retains the right to receive upon request the complete report.

#### Extension/Modifications to an Approved Study

Extensions and modifications to approved research are vetted through the same process as initial requests. This is done to ensure that a continuation or change of the research request is not intruding on the time, instruction, and practices of staff, students, schools, or the District.

If an extension or modification is requested, *all changes* to the original, approved, study must be indicated on the *new* application. This includes but is not limited to study timeline, addition of participants and or school sites, storage of data, reporting plans, and any changes to any other protocol(s). The participant consent form must also reflect any respective change(s). An extension will be awarded once per research request.

# Requesting Data

If you are requesting student data, please note that in most cases we require that you go through the full research review process by completing a research application and having it approved before the student data request is granted.

Data requests that take *more than one hour to fulfill are* charged with an hourly rate of \$125. The data **will be shared** via a secure One-Drive access file to which the researcher will have 72-hour access from the time permission is granted. After the granted time allotment, access will be removed. Once downloaded from the HCPS secure server, the data must be kept secure and destroyed when HCPS approval expires or federal, state, or institutional guidelines dictate. The data provided cannot be shared with a third party without a specific written permission from Hillsborough County Public Schools. If you are requesting data, signed parent and/or teacher consent forms must be obtained and provided when asked for by Hillsborough County Public Schools or the RRC where applicable. Once the Research Request is complete (including submission of the **Data Sharing Agreement Form (Form C)** to **ResearchRequest@hcps.net**, the RRC will be in contact regarding next steps. Data that can be requested is located here.

## **Data Handling and Destruction**

To receive access to District-held student level data, staff level data, or to conduct research in the District, the applicant must sign and submit the <u>Access and Use of Confidential Data (Form A)</u> or other agreement, as approved by the School District Attorney, that identifies requirements for the storage, use, maintenance, protection, dissemination, and destruction of data provided. The researcher must sign the Confidentiality/Data Security Agreement for each research proposal approved by the Research Request Committee.

Various regulations apply to the collection, storing, and subsequent destruction of data. Depending on the approved research, data may need to be stored for a minimum of 3 years providing the data remains secure. When research is completed, secure storing is no longer available, and/or the data are of no more use as a researcher, it is important to remember the confidentiality of your research participants throughout the process is of the utmost importance. Paper files must be shred and cross-shred or burned. Do not simply throw them in the trash. Electronic files stored on portable hard drives, CDs, DVDs should be "erased" and physically cleared, purges, and destroyed. Electronic files on computers and "Cloud"-based servers should be erased using commercial software applications designed to remove all data from storage devices.

# Assent and Consent Forms- NON-Observation/Recording

Prior to conducting research activities or collecting information from students or staff, consent must be given. The purpose of a consent form is to ensure that all participants in a study understand and agree to take part. Assent may only be given if the participant is 18 years old or older. Participants under the age of 18 must be given permission by their legal guardian(s) to take part. Student participants 18 years or older may must give their own consent. Assent and Consent can be given one of two ways: <a href="Passive/Opt-Out">Passive/Opt-Out</a>- where participants only bring back the forms if they **do not want to** take part, **or** <a href="Active/Opt-In-">Active/Opt-In-</a>- where participants only bring back the forms if they **want** to take part. Hillsborough County Public Schools requires the participants, or their guardians as deemed appropriate based on age, give their use of passive or active consent depending on what and how the study is be conducted. Consent forms are written in second person addressing the reader as if being spoken to.

Prior to getting identifiable student level data, the researcher must obtain written consent from the parent or guardian on behalf of a student or from a student of who is of legal age or emancipated. All consent forms must be submitted to the Research Request Committee for approval and must comply with the state and federal laws and regulations regarding confidentially of student records and the protecting study participants.

## Assent and Consent Forms- Observation/Recording

Participants in an approved research study involving observations and recordings will have an "Opt-Out" consent form for their participation in a HCPS approved study.

### Observation/Recordings

Audio and Video recordings are strictly restricted by HCPS to the following:

- All audio and video data captured is owned and stored by HCPS- not the researcher.
- Any person captured in the recording that has an "Passive/Opt-Out" consent on file,
   must not be identifiable (blurred-out face, masked voice, etc.).

#### Instruments

All data collection materials (surveys, observation measures, questionnaires, etc.) must be made available to participants/guardians prior to consent-if requested. Participants/guardians shall be informed of their right to view materials prior to consent in a reasonable amount of time. Participants/guardians shall be informed of their right to "Opt-out" of any research or data collection conducted.

Applicants/Researchers must not use any survey/assessment instrument that will:

- involve the collection, disclosure, or use of personal information collected from students for marketing or for selling that information (or otherwise providing that information to others for that purpose).
- require any student to submit to a survey/assessment that reveals information concerning:
  - political affiliations or beliefs of the student or the student's parent(s),
  - mental or psychological problems of the student or the student's family,
  - sex behavior or attitudes,
  - illegal, and anti-social, self-incriminating, or demeaning behavior,

- critical appraisals of other individuals with whom the student has a close family relationship,
- legally recognized privileged or analogous relationships, such as those of lawyers, physicians, or ministers,
- religious practices, affiliations, or beliefs of the student of student's parent(s); or
- income (other than that required by law to determine eligibility for participation in a program or for receiving financial help under such program)

without the prior consent of the student if the student is 18 or older, or without prior written consent of the parent if the student is under 18.

# Common Reasons for Denial

Hillsborough County Public Schools (HCPS, the District) is currently the nation's seventh largest school District with over 200,000 students and 260 traditional and charter schools. Due to its highly diverse geography and demography, HCPS offers a wide range of contexts for conducting educational research and program evaluations. As a result, the District receives numerous requests to conduct research from a variety of individuals and organizations, but not all requests will be granted. With the size and diversity of staff, students, and contexts afforded by Hillsborough County Public Schools, the following are *some* reasons a request for data, or the conduction of research might be denied. Below are **common** reasons for denial. Though this is not an exhaustive list, and each request presented is considered within the context of several factors, please consider each reason prior to submission.

- Too much time taken away from instruction;
- Sample is of an at-risk population
- Climate and Cultural conditions of schools
- Too much time expected of students or staff;
- Timing of request (during testing, end-of-year, etc.);
- Benefit to District is not clear, lack of alignment with District needs, sample size too small (in most cases this should be 3 or more) and not generalizable to larger body of students or instructional faculty;
- Burden to the District is too high (time to gather data, requirements of students, staff, or resources);
- Conflict of interest; programmatic conflict/incompatibility;
- Violates FERPA, Data Sharing Agreement/Protocols, Informed Consent

If an applicant has specific question(s) regarding a request denial, specific issues, or concerns, please contact the Office of Assessment and Accountability, Research and Evaluation at (813) 272-4341.

Again, we thank you for considering Hillsborough County Public Schools and wish you well in your research endeavors.