



# ADMINISTRATIVE PROCEDURE

## RESEARCH STUDY REQUEST

4131.34

Procedure No.

October 11, 2018

Date

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- I. **PURPOSE:** To provide procedures for obtaining authorization to conduct a research in the Prince George’s County Public Schools.
- II. **POLICY:**
- A. No student enrolled in or an employee of Prince George’s County Public Schools (PGCPS) should be the unwilling or unknowing subject of any research study or student/employee records access unless such activities are approved in advance by the individual authorized to give consent, i.e. the parent(s) of each student involved, any student aged 18 or older, or the employee.
- B. The Board of Education policy forbids the following: (1) the practice of “passive consent” in the administration of any external (third party) research; (2) the administration of any external (third party) research without written authorization from the Chief Executive Officer or the Office of Research and Evaluation (ORE); and (3) any research, instructional program, or course which includes questionnaires or surveys that ask students/employees questions, the nature of which might reveal potentially criminal or immoral activity.
- C. Subject to the exception provided under Section D below, no test, survey, questionnaire, or other form of data gathering and/or research shall be allowed in the school system - whether by teacher, counselor, principal or any school system employee or third party researcher(s) - seeking student or staff personally identifiable information for external research unless and until the following process is completed, including:
1. Review of the research application by the Office of Research and Evaluation (ORE) and permission officially granted by ORE for the specific research study;
  2. The written permission of the principal(s) of the participating school(s);
  3. The written and informed consent of the parent(s), as well as the assent of the student, to participate in research when personally identifiable data are reviewed, or students participate in the data collection process; and



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4. The written and informed consent of the employee when personally identifiable information (PII) is reviewed or employees participate in the data collection process.

- D. In limited circumstances, certain information requests regarding staff/employees may be considered public information under the Maryland Public Information Act. This information includes staff assignments and work contact information, salaries, and professional qualifications.

Requests for public information may be submitted to the Office of General Counsel for review. (See [Administrative Procedure 1120](#), Public Information Act Requests.)

- III. **BACKGROUND:** Prince George’s County Public Schools (PGCPS) represents a diverse cross-section of educators, students, and parents who are part of a multicultural community. The proximity of PGCPS to many graduate schools of education has resulted in a large number of requests for permission to conduct research studies in PGCPS. These procedures provide a consistent method for submitting research applications and for monitoring the conduct of research in PGCPS.

These research procedures do not apply to activities conducted by persons who are assigned to a PGCPS employee for purposes of student teaching, interning as a counselor or psychologist or similar experiential practices. The PGCPS employee whom such persons are assigned is responsible for maintaining the confidentiality of student records and the integrity of PGCPS.

- IV. **DEFINITIONS:**

- A. **Research:** A structured and systematic measurement, investigation, or evaluation that uses data (new and/or existing; qualitative and/or quantitative) to provide reliable, valid, replicable, and/or generalizable findings.

1. Examples of research include, but are not limited to: case studies, student record reviews and analysis, observations and interviews, ethnographic analysis, analysis of written materials, secondary analysis



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of data, achievement testing, surveys, experimental designs to examine causal relationships, product testing and analysis of cost and management records, and the study of grant programs or the evaluation components of grant funded programs (federal, state, local, foundations, universities, private) and other data gathering activities.

2. Examples of existing data include, but are not limited to: existing test data, human resources data, or financial data.
  3. Examples of new data include, but are not limited to: data created through the process of gathering, collecting, questioning, and surveying PGCPS students, families, and/or employees.
- B. **Personally Identifiable Information (PII):** Any data or information that would make it possible to identify an individual with reasonable certainty.
- C. **Informed Consent:** An approval process between a researcher and a potential research participant wherein the researcher seeks explicit permission to include the participant in research. Informed consent must conform to the requirements delineated in the Family Educational Rights and Privacy Act (FERPA; 20 U.S.C. § 1232g; 34 CFR Part 99) and the guidelines for human subject research set forth by the U.S. Department of Health and Human Services. Informed consent must include:
1. A description of the data to be collected, maintained, or released;
  2. The names and positions of those by whom the data may be collected, maintained and to whom it may be released;
  3. The purpose for the collection, maintenance, or release of the data;
  4. The signature of the parent/guardian;
  5. The signature of the eligible student if 18 years of age or older; and/or
  6. The signature of the employee.
- D. **Student Assent:** A child's affirmative agreement to participate in research.



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- E. **Passive Consent:** An approval process between a researcher and a potential research participant wherein the researcher uses implied “permission” to include a participant in research. The Board of Education does not recognize the concept of “passive consent.” The only type of consent permissible for external (third party) research studies is the written and informed consent as defined in subsection “C” of this Section IV.
- F. **Internal Researcher:** An employee or unit of Prince George’s County Public Schools (or an agent thereof) who seeks to conduct research as part of the employee’s or unit’s work responsibilities.
- G. **External (Third Party) Researcher:** Any individual, including but not limited to: any employee or unit of PGCPS who does not have an educational and/or professional “need-to-know” status as defined in the Family Educational Rights and Privacy Act, or who seeks to gather personal student or employee data or who seeks to conduct a research study for reasons of personal gain, interest or benefit; any government, institution (inclusive of institutions with which the school system is partnering), agency, or person(s) who seeks to conduct a research study or who seeks personally identifiable information who is not provided access to such as delineated in the Family Educational Rights and Privacy Act.
- H. **Parent:** An individual who is the legal guardian of a child.
- V. **GENERAL REQUIREMENTS FOR REVIEW AND EVALUATION OF RESEARCH APPLICATIONS:**
- A. All research activities including, but not limited to, those generated within PGCPS by staff, students, parents, community members, task forces, advisory groups, parent/teacher organizations committees, etc., and by external individuals and groups including, but not limited to, external researchers, doctoral candidates, for profit and not-for-profit research organizations, must be approved by the Office of Research and Evaluation prior to implementation.
- B. No member of the PGCPS professional or supporting services staff may authorize, support, or participate in a research activity, as defined in



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Section IV above, unless the Office of Research and Evaluation has formally approved the activity under the provisions of these Administrative Procedures.

- C. PGCPS employee-initiated research for personal advantage shall comply with the following requirements:
1. It shall not be conducted during regular school hours unless it can be accomplished without the loss of school system time.
  2. It shall not be conducted at the employee's work location.
  3. The employee may not recruit his/her subordinates, students, or students' parents as subjects for research.
  4. The employee may not communicate with research subjects via his/her PGCPS-issued e-mail account.
- D. The School System's "pony" mail delivery system cannot be utilized for any phase of external research.
- E. The following factors are considered by reviewers in evaluating proposed research activity:
1. Burden on PGCPS human resources or data management facilities;
  2. The technical soundness of the proposed research design;
  3. The appropriateness of the research topic for support in the public school setting;
  4. The availability of research sites and subjects of the kinds requested;
  5. The nature and amount of interruption required to participate in the proposed research;
  6. The kinds of background data on subjects required for the proposed study and the kinds of information of a personal nature to be secured from the subjects themselves;



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7. The kind and number of data-gathering procedures or instruments to be used in the study;
8. The need for the schools to safeguard the personal and legal rights of students, parents, and staff; and
9. The benefit of the proposed research to PGCPS.

### VI. **STUDIES WHICH ARE ELIGIBLE FOR THE SCREENING AND REVIEW PROCESS:**

- A. Proposals for research activities originating within PGCPS offices, departments, and other units transmitted through their area offices and central office administrative channels.
- B. Unsolicited research proposals submitted by external third parties.
- C. Proposals for master's theses and dissertation research from PGCPS employees.
- D. Proposals for dissertation research originating from persons other than PGCPS employees.

### VII. **STUDIES WHICH WILL NOT BE SUPPORTED OR APPROVED:**

- A. Studies below the doctorate level by persons who are not PGCPS employees.
- B. Studies whose research designs and/or methodologies do not meet the standards or requirements described in these procedures.

### VIII. **PROCEDURES:**

- A. Applicant's Responsibilities
  1. Applicant accesses the research application through the website of the Office of Research and Evaluation (ORE).



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2. At least six prior to the proposed starting date of the study, the applicant follows all instructions outlined on the website including:
  - a. Supplying all required information on the application; and
  - b. Submitting all required documents including:
    - a summary of the research proposal;
    - the complete research proposal;
    - all assessment instruments, protocols, surveys, etc.; and
    - all consent/assent forms prepared by the applicant as necessary.
3. Applicant prepares the application in conformance with the school system policies and procedures. The applicant should ensure that the application package is correct and complete.
4. Applicants who are preparing a study, which is required as partial fulfillment of a graduate degree, obtain the signature of the thesis or dissertation advisor. This signature attests that:
  - a. The applicant is a bona fide graduate student of the identified college or university;
  - b. The proposal, in the form presented to the Prince George's County Public Schools, has been reviewed by the college or university advisor for appropriateness of the study's subject, its usefulness and application to the School System, the research methodology, and the clarity and appearance of the materials to be submitted; and
  - c. The applicant has demonstrated the expertise necessary to execute an acceptable research project.
5. Applicants who are employees of the Prince George's County Public Schools must obtain the signature of the school system person to whom they report administratively. This may be a principal, director, associate superintendent, etc. The signature is an acknowledgement that the applicant's supervisor is aware of the proposed study.



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6. Applicants who are proposing research related to a new intervention or program must obtain approval from the appropriate program office within PGCPS for the implementation of said intervention or program.

#### B. PGCPS Responsibilities

1. Applications are reviewed by ORE and other school system professional staff who, based on the nature of the proposed research, should be consulted for review. Included among these are principals, directors, specialists, coordinators, supervisors, general counsel, and site personnel.
2. The application review process will not begin until all necessary documentation is received by the ORE. Incomplete applications will not be considered for approval.
3. ORE notifies the applicant of its decision in writing within six weeks of the receipt of the completed application. Applications approved by the ORE are conditional pending the signed consent of the principal(s) of the school(s) or applicable department(s) where the research will take place and the signed informed consent forms of the research participants.

#### C. Researcher's Obligations and Responsibilities

1. The applicant must provide written acknowledgement of the ORE's decision before initiating the research.
2. If the research project is authorized, the applicant is responsible for securing the consent of the director(s), supervisor(s), principal(s) of the school(s), etc. on the Permission to Conduct Research form. Copies of the signed forms must be submitted to the ORE.
3. Upon completion of the research, the researcher is responsible for retaining all signed consent forms for three calendar years.





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4. The principal/director, etc. may approve or disapprove only those studies authorized by the ORE.
  5. No deviation from the approved plan is to be made without approval from the ORE.
  6. All internal and external researchers must provide their completed research (abstract and final report) to ORE upon completion of the research. ORE will maintain a record of all research conducted in PGCPS.
  7. External (Third Party) Researchers will maintain the anonymity, confidentiality, and protection of personally identifiable information of individual students, schools, and school-system employees in reporting results, data, or research. External researchers will not release personally identifiable information in a way that permits linking specific individuals to specific responses or information. Furthermore, external researchers will not reveal the identity of schools, offices, divisions, or the county unless authorized by the Chief Executive Officer or his/her designee.
- IX. **MONITORING AND ACCOUNTABILITY:** In an effort to ensure that the research study request process is implemented, a summary of all research proposals submitted for screening, which includes a timeline for approval, will be provided to the Director of Testing, Research and Evaluation quarterly.
- X. **RELATED POLICIES, PROCEDURES AND LAWS:**
- A. Board Policy 5125, Student Records;
  - B. Board Policy 5125.4, Student Data Gathering;
  - C. Administrative Procedure 1120, Public Information Act Requests;
  - D. Administrative Procedure 5125, Individual Student School-Based Records;
  - E. Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g; 34 CFR Part 99;



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F. Code of Maryland Regulations (COMAR) 13A.08.02, Student Records

XI. **MAINTENANCE AND UPDATE OF THESE PROCEDURES:**

The Office of Research and Evaluation, Department of Testing, Research and Evaluation, is responsible for reviewing and updating these procedures.

XII. **CANCELLATIONS AND SUPERSEDURES:** This procedure cancels and supersedes Administrative Procedure 4131.34, dated December 7, 1994.

XIII. **EFFECTIVE DATE:** October 11, 2018