

APPROVAL PROCESS FOR RESEARCH STUDIES

The School Board recognizes the potential benefits of research conducted by qualified individuals, organizations, or institutions in developing, validating, and standardizing programs and strategies within the field of education. The Board authorizes the Superintendent or designee to approve research studies where it has been determined that such studies will confer benefits to ACPS; result in no harm to students, employees, or other participants; ensure appropriate privacy protections; and impose no significant burden on ACPS activities and operations.

This policy provides guidance regarding the review and approval of all research studies in Alexandria City Public Schools (ACPS).

With the exception of the Exempt Research described below, research activities conducted within ACPS must receive prior written approval from the Superintendent or designee. The Research Application Form is available on the ACPS website. This section describes the types of research considered for approval.

External Research

This policy applies to all requests by individuals and organizations to conduct research activities in ACPS or receive, for research purposes, identifiable and non-identifiable ACPS student or employee data that are not otherwise publicly available under the Virginia Freedom of Information Act. This policy applies to external researchers as well as ACPS employees who wish to conduct research or data collection activities when not assigned to do so by ACPS as a part of their job responsibilities.

Research Involving Sensitive Topics

This policy also applies to surveys conducted by ACPS employees, ACPS students, or external researchers asking about such sensitive topics as defined in Policy KFB as: political affiliations or beliefs of the student or student’s parent/guardian; mental or psychological problems of the student or student’s family; sex behavior and attitudes; illegal, anti-social, self-incriminating, or demeaning behavior; critical appraisals of others with whom respondents have close family relationships; legally recognized privileged relationships, such as lawyers, doctors, or ministers of religion; religious practices, affiliations, or beliefs of the student or student’s parent/guardian; or income (other than as required by law to determine program eligibility).

Exempt Research

Except for surveys including sensitive topics as outlined above, approval from the Superintendent or designee is not required for research conducted by ACPS in connection with evaluating and implementing instructional programs, and work done by ACPS employees in the normal course of their employment. Staff will obtain approval from their supervisor in advance of conducting research.

42 **DEFINITIONS**

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44 **Research** - Any systemic investigation, including instrument development, observation, testing
 45 (including survey), data analysis, and/or evaluation, that is designed to develop or contribute to knowledge
 46 that can be applied to contexts beyond the setting in which the investigation took place.

47

48 **Human Research** - Any systematic investigation, including research development, testing and
 49 evaluation, utilizing human subjects, that is designed to develop or contribute to generalized knowledge.
 50 Human research does not include research exempt from federal research regulation pursuant to 45 C.F.R.
 51 § 46.101(b).

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53 **RESEARCH SCREENING COMMITTEE**

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55 The Superintendent or designee establishes a committee composed of knowledgeable employees to
 56 conduct screenings of research requests. The research screening committee will be composed of
 57 representatives with a diverse set of backgrounds to ensure the competent, complete, and professional
 58 review of research activities. No member of the committee may be directly involved in the proposed
 59 research or have administrative approval authority over the proposed research except in connection with
 60 their responsibilities as a member of the committee. In deciding whether to recommend approval of
 61 proposed research, the committee will consider the factors listed in Va. Code § 32.1-162.19. The
 62 committee will convene twice annually to screen research requests following the deadlines for all
 63 applications of June 30 and December 31.

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65 **AUTHORITY TO APPROVE**

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67 Based on the recommendations from the screening committee, the Superintendent or their designee may
 68 approve or deny applications for research. If approved, the Superintendent or their designee may revoke
 69 such authorization at any time based on procedural violations, ethical issues, a change of priority or
 70 interest by ACPS, lack of funding or resources, or other good cause. If the research is being conducted by
 71 an individual or organization with an Institutional Review Board (IRB), both ACPS and IRB approval
 72 must be obtained.

73

74 **CONFIDENTIALITY, CONSENT, AND INSPECTION RIGHTS**

75

76 **Research Data Confidentiality Agreement**

77 All researcher applicants must agree to the ACPS Research Data Confidentiality Agreement which
 78 includes topics such as data collection, data sharing, data destruction, data access, and security
 79 controls.

80

81 **Confidentiality of Personally-Identifiable Student and Employee Information**

82 No personally-identifiable information (PII) concerning students or employees may be disclosed
 83 to researchers unless such disclosure is authorized by written consent of the student (if over 18
 84 years of age), parent/guardian, or the employee, unless the disclosure is authorized by state and
 85 federal law and consistent with the School Board policies and regulations. FERPA defines the
 86 term personally identifiable information to include direct identifiers (such as a student's or other

87 family member's name) and indirect identifiers (such as a student's date of birth, place of birth, or
88 mother's maiden name).

89

90 **Informed Consent**

91 Research and data collection activities will comply with all state and federal requirements
92 pertaining to informed consent, specifically Va. Code § 32.1-162.18.

93

94 **Survey Inspection, Consent, and Opt Out Rights**

95 Parents or guardians will be provided with advance notice of, and the opportunity to inspect, any
96 survey asking students about sensitive topics described in section II-B of this policy. For any non-
97 federally-funded survey, a parent or guardian will be provided the opportunity to opt the student
98 out of participation in the survey with no consequences. These survey inspection, consent, and
99 opt-out rights also apply to those surveys including sensitive topics administered by ACPS as part
100 of its instructional program.

101

102 **Use of Name**

103 The use of the division's name or the names of its schools in published research is prohibited
104 unless the researcher(s) receive written permission from the Superintendent or designee.

105

106 Adopted: January 9, 1997

107 Amended: July 1, 2005

108 Amended: June 1, 2006

109 Amended: June 11, 2015

110

111 Legal Ref.: Code of Virginia, 1950, as amended, sections §§ 22.1- 16.1, 22.1-78, 32.1-162.20

112 U.S.C. section 1232h (a)

113 45C.F.R.46.101 et seq.

114 8 VAC 20-565-10 et seq.

115

116 Cross Ref. : JO Student Records

117 KFB Administration of Surveys and Questionnaires

118

1 APPROVAL PROCESS FOR RESEARCH STUDIES

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3 The School Board recognizes the potential benefits of research conducted by qualified individuals,
4 organizations, or institutions in developing, validating, and standardizing programs and strategies within
5 the field of education. The Board authorizes the Superintendent or designee to approve research studies
6 where it has been determined that such studies will confer ~~substantial~~ benefits to ACPS; result in no harm
7 to students, employees, or other participants; ensure appropriate privacy protections; and impose no
8 significant burden on ACPS activities and operations.

9
10 ~~To~~ This policy provides guidance regarding the review and approval of all research studies in Alexandria
11 City Public Schools (ACPS).

12 ~~I.~~ **APPLICABILITY**

13
14 With the exception of the Exempt Research described below, rResearch activities conducted within ACPS
15 must receive prior written approval from the Superintendent or ~~his or her~~ designee. The Research
16 Application Form is available on the ACPS website. This section describes the types of research
17 considered for approval.

18
19 **~~A.~~ External Research**

20 This policy applies to all requests by individuals and organizations to conduct research activities
21 in ACPS or receive, for research purposes, identifiable and non-identifiable ACPS student or
22 employee data that are not otherwise publicly available under the Virginia Freedom of Information
23 Act. This policy applies to external researchers as well as ACPS employees who wish to conduct
24 research or data collection activities when not assigned to do so by ACPS as a part of their job
25 responsibilities.

26
27 **~~B.~~ Research Involving Sensitive Topics**

28 This policy also applies to surveys conducted by ACPS employees, ACPS students, or external
29 researchers asking about such sensitive topics as defined in ~~Policy KFB~~ Policy KFB as: political
30 affiliations or beliefs of the student or student’s parent/guardian; mental or psychological
31 problems of the student or student’s family; sex behavior and attitudes; illegal, anti-social, self-
32 incriminating, or demeaning behavior; critical appraisals of others with whom respondents have
33 close family relationships; legally recognized privileged relationships, such as lawyers, doctors,
34 or ministers of religion; religious practices, affiliations, or beliefs of the student or student’s
35 parent/guardian; or income (other than as required by law to determine program eligibility).

36
37 **~~C.~~ Exempt Research**

38 Except for surveys including sensitive topics as outlined above, approval from the Superintendent
39 or ~~his or her~~ designee is not required for research conducted by ACPS in connection with
40 evaluating and implementing instructional programs, and work done by ACPS employees in the
41 normal course of their employment. ~~It is expected that~~ staff will obtain approval from ~~a~~ their
42 supervisor in advance of conducting research.
43

Commented [1]: Board belief statement moved to the beginning of the document.

44 **H: DEFINITIONS**

46 **~~A. — Research~~**

47 Any systemic investigation, including instrument development, observation, testing (including survey),
48 data analysis, and/or evaluation, that is designed to develop or contribute to knowledge that can be applied
49 to contexts beyond the setting in which the investigation took place.

51 **~~B. — Human Research~~**

52 Any systematic investigation, including research development, testing and evaluation, utilizing human
53 subjects, that is designed to develop ~~of~~ contribute to generalized knowledge. Human research does not
54 include research exempt from federal research regulation pursuant to 45 C.F.R. § 46.101(b).

56 **~~AUTHORITY TO APPROVE~~**

57 ~~The School Board recognizes the potential benefits of research conducted by qualified individuals,
58 organizations, or institutions in developing, validating, and standardizing programs and strategies within
59 the field of education. The Board authorizes the Superintendent or his or her designee to approve research
60 studies where it has been determined that such studies will confer substantial benefits to ACPS; result in
61 no harm to students, employees, or other participants; ensure appropriate privacy protections; and impose
62 no significant burden on ACPS activities and operations.~~

Commented [MS2]: Moved up to the opening paragraph

65 ~~The Superintendent or his or her designee may revoke such authorization at any time based on procedural
66 violations, ethical issues, a change of priority or interest by ACPS, lack of funding or resources, or other
67 good cause.~~

Commented [3]: Moved down so the flow is better.

69 **IV: RESEARCH SCREENING COMMITTEE**

71 The Superintendent or ~~his or her~~ designee ~~shall~~ establishes a committee composed of knowledgeable
72 employees to conduct screenings of research requests. The research screening committee will be
73 composed of representatives ~~of varied with a diverse set of~~ backgrounds to ensure the competent,
74 complete, and professional review of research activities. No member of the committee may be directly
75 involved in the proposed research or have administrative approval authority over the proposed research
76 except in connection with ~~his or her~~ their responsibilities as a member of the committee. In deciding
77 whether to recommend approval of proposed research, the committee will consider the factors listed in
78 Va. Code § 32.1-162.19. The committee will convene twice annually to screen research requests
79 following the deadlines for all applications of June 30 and December 31.

Commented [MS4]: From the equity committee

Commented [5]: From Va. Code § 32.1-162.19

81 **AUTHORITY TO APPROVE**

83 Based on the recommendations from the screening committee, the Superintendent or their designee may
84 approve or deny applications for research. If approved, the Superintendent or their designee may revoke
85 such authorization at any time based on procedural violations, ethical issues, a change of priority or
86 interest by ACPS, lack of funding or resources, or other good cause. ~~If the research is being conducted by~~
87 an individual or organization with an Institutional Review Board (IRB), both ACPS and IRB approval
88 must be obtained.

Commented [MS6]: Added to ensure that both organizations approval processes are supported when applicable. There is no priority order as some IRBs may require ACPS approval before they will approve the research.

~~V.~~ **CONFIDENTIALITY~~CONFIDENTIALTY~~, CONSENT, AND INSPECTION RIGHTS**

Research Data Confidentiality Agreement

All researcher applicants must agree to the ACPS Research Data Confidentiality Agreement which includes topics such as data collection, data sharing, data destruction, data access, and security controls.

Commented [MS7]: Added a new agreement that aligns with the similar data protection agreement used with organizations that manage ACPS data.

A. Confidentiality of Personally-Identifiable Student and Employee Information

No personally-identifiable information (PII) concerning students or employees ~~may shall~~ be disclosed to researchers unless such disclosure is authorized by written consent of the student (if over 18 years of age), parent/guardian, or the employee, unless the disclosure is authorized by state and federal law and consistent with the School Board policies and regulations. FERPA defines the term personally identifiable information to include direct identifiers (such as a student's or other family member's name) and indirect identifiers (such as a student's date of birth, place of birth, or mother's maiden name).

Commented [MS8]: Added to provide specificity.

B. Informed Consent

Research and data collection activities will shall comply with all state and federal requirements pertaining to informed consent, specifically Va. Code ~~§ 32.1-162.18~~ § 32.1-162.18.

C. Survey Inspection, Consent, and Opt Out Rights

Parents or guardians will ~~be will shall be~~ provided with advance notice of, and the opportunity to inspect, any survey asking students about sensitive topics described in section II-B of this policy. For any non-federally-funded survey, a parent or guardian will be provided the opportunity to opt the student out of participation in the survey with no consequences. These survey inspection, consent, and opt-out rights also apply to those surveys including sensitive topics administered by ACPS as part of its instructional program.

D. Use of Name

The use of the division's name or the names of its schools in published research is prohibited unless the researcher(s) receive written permission from the Superintendent or ~~his or her~~ designee.

- Adopted: January 9, 1997
- Amended: July 1, 2005
- Amended: June 1, 2006
- Amended: June 11, 2015

Legal Ref.: Code of Virginia, 1950, as amended, sections §§ 22.1- 16.1, 22.1-78, 32.1-162.20
U.S.C. section 1232h (a)
45C.F.R.46.101 et seq.
8 VAC 20-565-10 et seq.

Cross Ref. : JO Student Records
KFB Administration of Surveys and Questionnaires

Commented [9]: Added as FERPA applies to research studies.