



## **Guidelines for Conducting Research in Pinellas County Schools**

### **Department of Assessment, Accountability, and Research**

#### **Introduction**

Pinellas County Schools recognizes the value of educational research and its contribution to the field of education. The district also acknowledges the benefit of research in planning for the needs of students, measuring the effectiveness of programs and instruction, developing curriculum and instructional programs, and improving educational practice. Pinellas County Schools frequently receives requests from individuals and organizations to conduct research studies with students and/or their families, teachers, principals/administrators, and other school-based staff. While it is district policy to cooperate with researchers/study investigators whose projects might benefit education, all individuals and organizations interested in conducting research in the district must have their proposals reviewed by the Institutional Review Board (IRB) within the Department of Assessment, Accountability, and Research (AAR).

#### **Types of Research and Definitions**

In order to be considered by the IRB, research must fit into one of six categories: 1) Academic Study/Classroom Project; 2) MA Thesis or Ph.D. Dissertation/Degree Program; 3) State or National Study (other than reporting requirements mandated by the state or federal government); 4) Grant Mandated Evaluation; 5) Program Evaluation; 6) Publication (peer-reviewed journal or academic text).

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 of information aimed at discovering new 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.

Researchers/Study Investigators include:

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

*Instructional interventions must be approved by the Office of Teaching and Learning Services. Instructional interventions designated for the purpose of a master's thesis or doctoral dissertation will not be accepted.*

*Any research that involves human subjects requires IRB approval. A human subject is defined as: A living individual about whom an investigator conducting research obtains 1) data through intervention or interaction with the individual or 2) identifiable private information.*

*IRB approval does not guarantee that the research will be permitted within a particular school. Principals(s) of designated schools will ultimately accept or decline to participate in accordance with the procedure of the study. All research in schools must be done in cooperation with the principal or their appointed representative to ensure that the research is not disrupting existing school activities. Participation of teachers and students/families is voluntary.*



### **Pinellas County School District Employees**

#### **STUDENT/SCHOOL-BASED RESEARCH TO IMPROVE INSTRUCTIONAL PRACTICES:**

Teachers may gather and analyze data at any time if the data are being used solely for the improvement of their own professional practice and if the collection of such data would be part of ordinary instructional procedures for their own students. *Research of this nature should have the approval of the school principal, but does not require IRB approval.*

#### **RESEARCH CONDUCTED AS PART OF A COLLEGE OR UNIVERSITY DEGREE PROGRAM OR CLASS:**

Research conducted by PCS employees as part of a requirement for a class or degree program; involves a systematic investigation, including research development, testing and evaluation, designed to develop or to contribute to generalizable knowledge; or is necessary to fulfill requirements for a master's thesis, doctoral dissertation, or other research requirements of a College or University requires IRB approval.

### **Institutional Review Board and Research Proposals**

Research applicants are encouraged to contact AAR staff prior to finalizing the research plans to determine the feasibility of their proposed study in the district and to facilitate closer coordination between district requirements and their research efforts.

The IRB will review research proposals that meet the following approval criteria:

- The proposed research is compatible with PCS policy and must protect the privacy of all participants and ensure compliance with state and federal laws;
- The proposed research has high value to a particular school or the school system as a whole, or will significantly contribute to the field of education, and/or benefits educators;
- The research design and methodology of the study including all data collection instruments is sound and uses valid and reliable techniques;
- The proposed research does not interfere with the educational programs of the district and is compatible with sound educational practice;
- The proposed research cannot be considered a burden to students, families, or staff. The benefits of the research must outweigh the costs, which include staff/student time and other resources. Evaluating whether the burden is considered excessive is the responsibility of the IRB. However, what is considered burdensome has very different values in different contexts, and ultimately participants will decide whether the cumulative burden on them is acceptable even if the study is IRB approved;
- The district/school/staffs' tasks are clearly defined and delineated from the responsibilities of the researcher/study investigator. PCS staff, while serving as facilitators, will not assume responsibility for study recruitment, completion of any project, and/or for providing technical assistance;
- Subject/content is not considered to be controversial or inflammatory;
- The proposed research does not unduly interfere with instructional time or disrupt school activities, including local and state assessments. There must be minimal interference with school instruction/operations and relationships between students, parents, and school and district staff;
- The research is consistent with IRB policies;
- The proposed research must document that the researcher or organization has the capacity and experience to successfully complete the project;
- Researchers/study investigators will abide by standards of professional ethics;
- The relative cost-benefit to the school district should be equitable.

*These procedures and criteria are in place to protect students and staff of the district. While the district welcomes research studies, it is important to note that failure to adhere to district and IRB policy and procedures will result in denial of the application (proposal). Failure to abide by district and IRB policies will be sufficient cause for termination of any study previously approved.*



It is important that all applications (proposals) be complete. Incomplete applications (proposals) may be rejected without review. Each research application must include (see application for further detail):

- Institutional review board (IRB) approval/exemption and a letter of support from the advisor or sponsor (if the proposal is associated with a college or university course or degree program) or authorization for the study (if it is associated with a government or private agency). *Applicants may submit an initial application without University IRB or Sponsor support attached to begin the review process, but final PCS IRB approval will not be granted without this documentation on file.*
- Abstract
- Rationale for the study
- Literature Review/Theoretical Framework
- Research questions/hypotheses
- Sampling procedures
- Details of how study participants will be recruited for participation in the proposed research if applicable. To avoid any perceived coercion, any recruitment materials to participate in research/invitation to conduct research are to be printed on the researcher/study investigator's letterhead and may not indicate PCS sponsorship of the research study. Researchers may not ask principals to assist them in identifying and recruiting school staff to participate in their study. Researchers may request a meeting with school staff outside of instructional time, email school staff information about the study, or ask that recruitment materials be distributed in staff mailboxes with IRB approval and the principal's permission. School staff may choose not to participate in a research study, even though the study has been approved by the principal. Researchers may not ask administrators, teachers, or other school staff to assist them in identifying/recruiting students to participate in their study. Methods that can be used to recruit students include the distribution of materials for students to take home to review with their parent/guardian, scheduling meetings with student groups to describe the study, provided that instructional activities are not interrupted, and/or meeting with parent/guardian groups to describe the study. All of these approaches require IRB approval and the principal's permission.
- Attach draft copies of any forms, letters, and/or other documents that will be provided to participants or their parents/guardians.
- Attach draft copies of a letter of invitation to principals to conduct research in their schools (if applicable)
- Data collection methodology (if applicable)
- Detailed secondary data request (if applicable)
- Measures: For all research instruments that are not part of the district's existing assessment program, submit copies of the instruments.
- Analytic Plan
- Researchers/Study Investigators must provide detailed information explaining how the researcher will address privacy and confidentiality issues, any potential risks to participants, and how those risks will be mitigated.
- Please attach copies of informed consent forms that comply with Family Educational Rights and Privacy Act (FERPA) and Protection of Pupil Rights Amendment (PPRA) guidelines.
- The research proposal will include a statement of how research participants are to be compensated for their involvement, if at all.
- Statement of Burden to the District
- Statement of Benefit to the District
- Data Procedures
- Submit all applicable PCS IRB required forms (Form A, Form B, Form C. Level II Security Clearance).
- Timeline of research - must include start and end date of all research activities and data collection and/or anticipated dates for delivery of secondary data. Researchers/study investigators should also clearly outline the amount of time necessary to complete data collection. Please note that if research activities exceed one year beyond date of proposal approval, an extension must be submitted to IRB.



## Consent

The Federal Educational Rights and Privacy Act (FERPA) and the Protection of Pupil Rights Amendment (PPRA) are based on the premise that information about an individual student is private and confidential and generally may only be accessed with parent consent. Proposed research requiring student participation may require written parent/guardian consent prior to study activities commencing. Research requiring student participation may require written student assent in addition to written parent/guardian consent. Some research requiring staff participation may require written consent. The IRB will determine if consent/assent is required.

Written consent is not required for studies involving observation of unidentifiable students engaging in normal school activities, but it is required in the following circumstances:

- From active participants or from parents/guardians of students under the age of 18 years participating in research projects involving identified students or access to student records
- For student surveys or interviews if they include questions that reveal information referenced in Policy 2416 (see p. 4 for further information)
- From PCS staff, including teachers, who participate in research pursuant to PCS policies and or administrative procedures
- For studies that involve identified personnel or access to personnel records

If consent is required, all consent forms must:

- Be in the form of a letter, in a conversational format that is easily understood by parents/guardians/participants;
- Identify the researcher(s) conducting the study (e.g., graduate student at a local University; National Evaluator, etc.) and include contact information so that the parent or participant may call if there are questions or concerns;
- The purpose(s) for collecting data;
- Information regarding confidentiality;
- A statement regarding participation being entirely voluntary and that participants may withdraw from the study at any time without consequence(s);
- The activities participants will be asked to complete (e.g., participate in a focus group with five other students, complete a survey online, complete a short reading assessment, etc.);
- If the participant will be audio- or videotaped and how privacy will be protected;
- The individual data requested of participants;
- The total amount of time required of the participant;
- Space for either consent or refusal to participate with signature line;
- Name, title, and telephone number of the Chair of the Institution's IRB, along with an invitation for participants to call regarding any concerns they have regarding participation in the research;
- Consent and assent forms may not indicate PCS sponsorship of the research study.

## CONSENT FORM PROCEDURES - STUDENTS

- The researcher/study investigator will coordinate with school(s)/study site(s) and arrange for distribution and collection of parent/guardian consent forms;
- The parent/guardian consent form must be signed and collected prior to any involvement of a student in research;
- Failure to return the signed parent/guardian consent form will exclude the student from participating;
- Verification of parent/guardian signatures collected by the researcher or designated staff will be the responsibility of the school principal or research sponsor at study sites. The principal/sponsor will identify for PCS staff the students permitted to participate in the study;
- A copy of the signed parent/guardian consent form is to be filed in the student's cumulative folder;
- Parent/guardian consent forms must be made available in the parent's native language if the parent is not fluent in English. It is not acceptable to rely on the student to translate the information provided in the consent form to their parent/guardian(s).



- The researcher/study investigator will provide parent/guardian(s) with a copy of the signed consent form;
- The PCS IRB may request copies of signed consent forms from the researcher/study investigator at any time to ensure compliance

#### CONSENT FORM PROCEDURES – STAFF/FAMILIES

- The researcher/study investigator will coordinate with school(s)/study site(s) and arrange for distribution and collection of staff or family member consent forms;
- The consent form must be signed and collected prior to any involvement of staff or families in research;
- A copy of the signed consent form is to be filed with the principal/research sponsor;
- Parent/guardian consent forms must be made available in the parent’s native language if the parent is not fluent in English. It is not acceptable to rely on the student to translate the information provided in the consent form to their parent/guardian(s);
- The researcher/study investigator will provide parent/guardian(s) with a copy of the signed consent form;
- The PCS IRB may request copies of signed consent forms from the researcher/study investigator at any time to ensure compliance.

#### Policy 2416

Researcher(s) must include in the application (proposal) a statement as to whether the research seeks to elicit information from students regarding any of the following eight areas specified in PCS Policy 2416. Written consent from parent/guardian must be obtained prior to eliciting the information for students under the age of 18. If the student is 18 years of age or older, the student may provide his/her own written consent before providing the information. Some studies may require parent/guardian consent and student assent.

- political affiliations or beliefs of the student or the student’s parent;
- mental and psychological problems of the student or the student’s family;
- sexual behavior or attitudes;
- illegal, anti-social, self-incriminating, or demeaning behavior;
- critical appraisals of other individuals with whom respondents have close family relationships;
- legally recognized privileged or analogous relationships, such as those of lawyers, physicians, and ministers;
- religious practices, affiliations, or beliefs of the student or student’s parent;
- Income (other than that required by law to determined eligibility for participation in a program or before receiving financial assistance under such program).

Researchers/Study Investigators must include the following with their recruitment/consent materials if the proposed research seeks to elicit information from students regarding any of the following eight areas specified in PCS Policy 2416.

##### Participation Voluntary

No student shall be required to participate in such a survey if the student (or the student’s parent, if the student is less than eighteen (18) years of age), objects to participation.

##### Right to Inspect

A student (or the student’s parent, if the student is less than eighteen (18) years of age), has the right to inspect any such survey instrument before the survey is administered or distributed to students if a request is made within a reasonable period of time. Parents also have the right to be advised of arrangements that will be made to protect student privacy. Student survey instruments and teacher directions for administering the survey will be available at each participating school within a reasonable period of time prior to the survey administration.

*Failure to comply with all federal, state, and district policies around privacy and consent will result in an investigation by PCS and other appropriate authorities. The outcome of the investigation may lead to corrective action, suspension or termination of research, or other disciplinary actions.*



## **Research Incentive Guidelines**

### Students

Students may not receive direct compensation, rewards, or other incentives for participation in research conducted in Pinellas County Schools. Students may not earn extra credit or participation points for participation in research.

### Parent/Guardian/Families

Parents, guardians, and family members of PCS students may not receive direct compensation, rewards, or other incentives for their participation in research conducted in Pinellas County Schools. Parents, guardians, and family members are permitted to receive services as part of their research participation (i.e., parenting class).

### Staff Members/Schools

PCS staff may receive incentives for their participation in research activities. To qualify as an approved incentive, the value must be \$25 (preferably in the form of a gift card) and the incentive must be offered to all persons recruited for the study. PCS teachers are not permitted to receive incentives for research participation during instructional time. Feedback to principals, teachers, and/or staff involved in research studies, in-kind service to the school(s), or monetary donations to school funds (not to exceed \$300) are also acceptable forms of research incentives.

If compensation for staff exceeds \$25 per individual participant (for example, grant funded stipends) or monetary donations to school funds exceeds \$300, the IRB will review these instances on a case-by-case basis.

Compensation and/or incentives must be clearly stated in the research application and must be IRB approved prior to research activities being conducted. Some incentives may also need approval by principals or area superintendents prior to research activities being conducted.

*Methods used to recruit and compensate research participants must be free from coercion or undue influence, respect the privacy rights of prospective participants, and provide for their fair and unbiased selection. As with the informed consent process, research applicants/study investigators and the PCS IRB must consider the content, comprehensibility, and voluntariness of the methods used to recruit and compensate participants.*

## **Letter of Invitation to Principals**

Approval by the PCS IRB does not guarantee access to any particular school, individual, or data source. Principal(s), or other PCS staff dependent on the research proposal, may choose that their school/program/staff/students not participate in the research, or may withdraw their school/program from participation at any time without any consequence. It is the researcher/study investigator's responsibility to reach out to principals or other appropriate PCS contacts to get required permissions before initiating a study. The researcher must provide the principal, or other relevant PCS staff, with a letter of invitation to participate in research.

The letter of invitation to the principal should outline the research design/methodology and provide enough information to assist the principal to make an informed decision about their school's participation. This would include what is most pertinent to the impact of the research on the school (including burden and benefits to students and staff), as well as the following:

- The researcher/study investigator's credentials;
- Rationale for selecting particular school(s);
- How research participants will be identified/recruited;
- Plan(s) for how to schedule data collection activities so as to not interfere with instructional time;





- Procedures for managing time commitment involved for staff and students;
- Detailed explanation regarding the use of school equipment (e.g., computers for taking surveys);
- Procedures for obtaining consent;
- Human subjects protections concerning confidentiality and anonymity and any possible risks/benefits of participation for research subjects;
- Intended uses of the research findings;
- If a study involves a randomized control trial (RCT), principal approval should be requested after randomization has taken place; principals should be informed of whether their school will be in the control or treatment group.

*The principal is entitled to review the complete research application on file with AAR and to contact the department to discuss the proposed research.*

## **Compliance**

Research conducted in PCS must comply with all federal, state, and district policies and procedures. All research activities, including data collection from or about individual students, parents, or staff, must comply with the following

- The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.  
<https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>
- Protection of Pupil Rights Amendment (PPRA). The PPRA applies to the programs and activities of a State educational agency (SEA), local educational agency (LEA), or other recipient of funds under any program funded by the U.S. Department of Education. It governs the administration to students of a survey, analysis, or evaluation that concerns one or more of eight protected areas.  
<http://familypolicy.ed.gov/ppra?src=ferpa>
- Florida Legislation regarding student records. § 1002.22 - Education records and reports of K-12 students; rights of parents and students; notification; penalty  
[http://www.leg.state.fl.us/Statutes/index.cfm?App\\_mode=Display\\_Statute&Search\\_String=&URL=1000-1099/1002/Sections/1002.22.html](http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=1000-1099/1002/Sections/1002.22.html)
- State Board Rules (6B-1.001 & 6B-1.006, F.A.C.) <https://www.flrules.org/default.asp> • Florida Department of Education Rules regarding the release of student records <http://info.fldoe.org/docushare/dsweb/Get/Document-5134/releaserecords.pdf>
- Florida Jessica Lunsford Act as describe in Florida Statutes (§ 1012.465, .467, and .468, F.S.)  
<http://pcsb.schoolwires.net/Page/2781>
- Pinellas County School Board Policy 2416 which is found in the “Code of Student Conduct” and is located within the section entitled “Annual Notice of School Board Policy Required by the Protection of Pupil Rights Amendment”.  
<http://www.pcsb.org/Page/2784>
- All researchers/study investigators must agree to maintain the anonymity of individual students, staff members and schools in any report(s) and in any presentations, publication(s), e.g., journal article(s), book(s), etc., which incorporate any information derived from the research conducted within Pinellas County Schools, unless expression permission from the Pinellas County School Board is otherwise provided.

## **Application (Research Proposal) Submission Requirements**

The research applicant must submit a completed research application for review. The application is available online at [www.pcsb.org/Page/2787](http://www.pcsb.org/Page/2787) . The completed application and forms should be attached to an email addressed to Dr. Merlande Petit-Bois at [petitboism@pcsb.org](mailto:petitboism@pcsb.org) .



The following documents must be submitted:

- Application to Conduct Research in Pinellas County Schools including all items described on page 3 of this document.
- *If applicable* Request for School Principal Agreement to Conduct Research in School [Form A]. If research goes beyond one school year principal agreements will need to be updated annually, based upon the original submission date. *Research applicants should not communicate with principals until after IRB preliminary approval is granted.*
- Primary Investigator and Research Sponsor Assurances [Form B].
- Access and Use of Confidential Data [Form C].
- Proof of background clearance (Jessica Lunsford Act, Level 2 Screening) is required for all research applicants accessing school grounds. It is advisable for the research applicant to begin the background clearance process early to avoid possible delays. Proof of level 2 screening is required before final approval will be granted from AAR.

All forms requiring signatures are designed for electronic signatures. Directions for using electronic signatures are on the forms.

In most instances, the application should have a sponsor; a sponsor is someone who endorses the proposed research, deems it appropriate, believes it to be based on sound educational and research practices, and endorses its approval. The sponsor may be a college or university dean, the professor of record for a course, an agency director, or a Pinellas County Schools' administrator. University or Agency IRB approval is sufficient if the research applicant is a university faculty member or agency study investigator.

Completed applications and all requested documents must be received and approved by the IRB prior to any research being conducted. Any changes must be approved prior to being implemented. The researcher must provide a copy of all communication with principals, teachers, staff, families, and students throughout the study. Any adverse or unexpected events related to the research must be reported immediately to AAR (727-588-6253).

## **APPLICATION REVIEW PROCESS**

The IRB meets regularly to discuss and review research proposals. After application review, an email is sent to the applicant indicating the IRB's decision. The IRB may come to one of four conclusions; (1) approve the research proposal outright (final approval); (2) approve the research proposal with conditions to be met prior to study commencement (preliminary approval) – final approval is required before study activities can occur; (3) require the applicant to clarify or modify the proposal in order to fulfill IRB requirements (revisions required), (3) decline the research proposal (declined). The review process takes approximately four weeks; however, delays can occur. An application should be submitted well in advance of the proposed research start date (see deadlines - <https://www.pcsb.org/Page/2787> ). This ensures adequate time for review, possible modifications, contacting principals and/or other PCS staff, and obtaining final approvals from PCS and the research applicant's IRB. The proposed research start date, listed in the application, must allow for the IRB processing time.

Revisions, modifications, and continuing review applications are reviewed on a rolling basis, in the order they are received. Applicants can expect a decision within two weeks after materials are received. Materials should be submitted at least 30 days prior to anticipated commencement of modified research activities, or 30 days before your current approval to conduct research expires.

Approval is valid for one year from the date of the approval letter. You may propose a multi-year study. Independent of how long your study takes to complete, you will be asked to submit an annual update. This update would consist of a summary of findings if the study is at completion or a request for an extension should the study need to continue beyond one year. So long as no substantive changes are made to the original proposal for a multi-year study, approval





may be renewed via the annual update without the need for a revised proposal to be submitted each year. Form A will need to be completed each year.

*PLEASE NOTE: An approval letter indicates that the proposal has met the IRB requirements; however, it does NOT commit school(s), staff, or students/families to participate. Principals(s) of designated schools will ultimately accept or decline to participate in accordance with the procedure of the study. All research in schools must be done in cooperation with the principal or their appointed representative to ensure that the research is not disrupting existing school activities. Participation of teachers and students/families is voluntary.*

The PCS Institutional Review Board consists of five AAR staff members who are knowledgeable about PCS data, research and evaluation methods, and statistical analyses. When applicable, input from other departments or programs, who are familiar with a particular research topic, will be requested to provide feedback regarding the relevance of the study. The applicant will be advised to re-submit if revisions are required. The research applicant will be notified by email once a decision has been made. If your research application is denied, there is no appeal process; however, applicants may request a meeting with the IRB to discuss the decision.

Upon completion of the research study, researchers/study investigators are responsible for supplying the Office of Assessment, Accountability, and Research with a written summary of their findings. AAR reserves the right to provide input that the author will consider prior to dissemination of the results. In addition, if the anonymity of participant(s), school(s), or the district is compromised, AAR reserves the right to restrict dissemination of the results. Any publications resulting from the research including journal articles, book chapter, or dissertation must be submitted to AAR promptly. Researchers/study investigators may be requested to report detailed research findings to interested school personnel at a meeting arranged by AAR.

*All research proposals should be designed to answer informed research questions of educational importance using appropriate methodologies. Fundamentals of the research design, including the theoretical framework, hypotheses, sample selection, instruments, and proposed analyses are expected to support the goals of the research. It is the responsibility of the researcher to communicate these elements clearly in the proposal. Even research that imposes no risks may be rejected by the IRB if they judge it to be poorly designed, described, or justified.*

***AAR IRB approval does not impose any obligation on any person, school, or office to cooperate with researchers/study investigators.***