



Policy Outline

- I. Policy Value Statement
- II. Purpose
- III. Standards
 - A. High-Quality Research
 - B. Approval of Research
 - C. Conducting Research
 - D. Reporting Research and Data Privacy and Protection
 - E. Training
 - F. Rejection or Termination of Research
 - G. Out-of-Scope Items
- IV. Responsibilities
- V. Delegation of Authority
- VI. Definitions
- VII. References
- VIII. History

I. Policy Value Statement

The Board of Education believes that high-quality research is necessary to evaluate and improve educational programs and practices. The Board supports the use of research as a tool to contribute scholarship, the sciences, and the opportunity for staff to grow and learn. The Board also values student-led research to further inquiry-based learning and empower learners to engage in authentic learning experiences.

The Board requires that individuals and agencies seek permission to conduct research in the school system. The Board also recognizes its responsibility of ensuring that research conducted in the system meets high standards of quality and rigor, safeguards the privacy and confidentiality of individuals, furthers the goals and priorities of the school system, and minimizes interruptions to the instructional program and workday.

II. Purpose

The purpose of this policy is to establish guidelines for how research within the Howard County Public School System (HCPSS) is approved, conducted, and reported.

III. Standards

- A. High-Quality Research

High-quality research proposals will articulate a clear purpose and methodological rigor and will be considered for approval based on its relevance to current school system goals and priorities. High-quality research includes the following:

1. Research questions or hypothesis refinement/testing that are based on theory and are highly relevant to and add to the existing knowledge base on Pre-K-12 teaching and learning, especially in the context of HCPSS priorities.
2. Research methods that are appropriate for addressing the research questions include, but are not limited to: study sample, study design, instrumentation, data collection, and data analysis plan.
3. The applicant demonstrates that their role will not conflict with the interests of the research subjects. Research design takes into account the need to eliminate any potential power differential between the researcher and research subjects, or perceived and real authority of the researcher over the research subjects.
4. If the applicant is an HCPSS student in an HCPSS research class, the student's teacher will oversee that all research activities are conducted as approved.
5. If the applicant does not hold a doctorate, a research supervisor with a doctorate is required. The supervisor will oversee that all research activities are conducted as approved.
6. If the applicant is applying on behalf of an organization, the principal investigator must hold a doctorate and this individual will oversee that all research activities are conducted as approved.
7. All applicants, including the principal investigators and all personnel to be involved, must demonstrate completion of learning modules provided by the Superintendent/designee related to protecting human subjects and adhering to data privacy laws and regulations.

B. Approval of Research

All proposals to conduct research in HCPSS will be screened and evaluated according to the guidelines outlined in this section.

1. Research proposals from external researchers must be presented to the Superintendent/designee for screening, and evaluated for approval and the documentation of approval be provided to the Board of Education at a regularly scheduled Board meeting.
2. Upon request by the Superintendent/designee, external research conducted in schools must have approval from each school's principal as part of the approval process.

3. If the research is conducted on HCPSS campuses, an HCPSS employee will be assigned by the site leader as the point of contact to monitor that the research is conducted as approved.
4. Research proposals by HCPSS students that are part of regular classroom assignments, must be approved by the teacher of that class.
5. The HCPSS will not approve or support:
 - a. Research proposals designed to meet requirements for receiving credit in undergraduate or graduate courses (including doctoral comprehensive exam requirements), seminars, practicau or training workshops.
 - b. Research proposals from non-HCPSS employees for master's theses and doctoral dissertations. Note, HCPSS does consider research requests conducted for master's theses and doctoral dissertations from HCPSS employees and HCPSS pre-service candidates/interns.
 - c. Research proposals for studies that are determined by HCPSS to involve greater than minimal risk.
 - d. Research proposals that are not of a high quality.
 - e. External research proposals involving human subjects without an Institutional Review Board (IRB) letter either approving the research or exempting the research from IRB review.
 - f. Research proposals for studies that are determined by HCPSS to involve undue burden on the proposed participants or on system resources.
 - g. Research proposals from non-HCPSS prekindergarten through grade 12 students.
 - h. Research proposals that do not have a direct benefit to the priorities of HCPSS.
6. Research that is not subject to the approval process by the Superintendent/designee includes:
 - a. HCPSS school-based and Central Office administrators and other employees (including task forces, advisories, work groups, HCPSS-contracted employees, and HCPSS-contracted research agencies) gathering, having access to, and/or using data that are inherently required to fulfill the responsibilities and functions of their roles.

- b. Action research and research conducted by HCPSS students as part of a class taught by an HCPSS teacher.
 - c. Data collection as required by federal, state, or local laws and regulations.
7. Authorization for an external researcher to conduct research is granted upon written approval by the Superintendent/designee.

C. Conducting Research

Only researchers with approved research proposals may conduct research in HCPSS.

1. All researchers will adhere to the following ethical standards:
 - a. Include the HCPSS approval letter outlining the conditions under which their research is approved in initial communications with HCPSS employees, students, and families.
 - b. Ensure that their research does not create greater than minimal risk.
 - c. Honor all guarantees of anonymity and confidentiality.
 - d. Protect the confidentiality of all Personally Identifiable Information (PII).
 - e. Obtain written informed consent and minor assent as appropriate and in compliance with the Family Educational Rights and Privacy Act (FERPA) and Protection of Pupil Rights Amendment (PPRA), and recognize that participation in research is voluntary and that subjects may withdraw from participation at any point in time.
 - f. Compensation of research subjects is not necessary nor encouraged. However, if offered, researchers must follow HCPSS Policy 2070 Ethics and not exceed \$20.00 in value.
 - g. Collect data for the sole purposes of the approved research activities.
 - h. Obtain HCPSS written approval before making any modifications to the approved research proposal.
 - i. Destroy, as necessary, all collected data within the timeframe agreed upon during the approval process. This is the disposal of data through shredding, deletion, or other methods.
2. The following types of research activities involving adults, as well as students, regardless of age and/or IRB requirements, require the written informed consent

from a parent (or student of majority age or emancipated minor student) and the assent of the student.

- a. New data collected for the research, per the PPRA. This excludes data that is job-embedded data or collected as part of student-led research as part of an HCPSS class, unless the new data to be collected is governed by PPRA. If educational records are requested as part of the research proposal, the Superintendent/designee will consult with appropriate HCPSS and/or educational data privacy subject matter experts to comply with FERPA.
 - b. Participation in research that is neither action research nor student-led research as part of an HCPSS class.
 - c. Research, including action research and student-led research, on any of the sensitive topics. In compliance with the PPRA and this policy, sensitive topics include:
 - i. Political affiliations or beliefs of the student, the student's parents, the student's family, or HCPSS employees.
 - ii. Mental or psychological problems of the student, the student's family, or HCPSS employees.
 - iii. Sexual behavior or attitudes.
 - iv. Illegal, anti-social, self-incriminating, or demeaning behavior.
 - v. Critical appraisals of others with whom respondents have close family relationships.
 - vi. Legally recognized privileged or analogous relationships, such as with lawyers, doctors, or ministers.
 - vii. Religious practices, affiliations, or beliefs of the student, the student's parents, the student's family, or HCPSS employees.
 - viii. Income, other than as required by law to determine program eligibility.
 - d. HCPSS reserves the right to require written informed consent, even if the applicant's IRB waived the requirement.
3. Action research activities will not require burden on HCPSS employees beyond normal job duties. Action research activities also will not interrupt HCPSS teaching and learning and operational processes.

4. All researchers will adhere to federal, state, and local laws and regulations as well as HCPSS policies, procedures, and guidelines for maintaining the accuracy, integrity, quality, and confidentiality of student and employee data in any format and location.
5. Research activities will not put undue strain on system resources. This includes no undue interference with the internal researcher's and other employees' normal work duties. Any use of HCPSS resources to conduct research requires supervisor/designee approval and the approval of the office that owns the resource.

D. Reporting Research and Data Privacy and Protection

HCPSS will adhere to all federal, state, and local laws and HCPSS Policy 3060 Student Data Governance and Privacy for determining researchers' level of access to PII, if any. Researchers will adhere to all federal, state, and local laws and HCPSS Policy 3060 Student Data Governance and Privacy for ensuring that PII remains confidential throughout both the conducting and the reporting of approved research.

1. To the extent possible, researchers will maintain anonymity when conducting research. Anonymity of subjects must be maintained in any dissemination of information gained from approved research activities.
2. Researchers will maintain the anonymity, confidentiality, and protection of PII of individual students, schools, and HCPSS employees in reporting the results.
3. Researchers will not release data or information in a way that permits linking specific individuals to specific responses or information.
4. Researchers will not reveal the identity of schools, offices, departments, divisions, or the district.
5. Dissemination of information obtained from action research conducted by HCPSS employees will be screened and evaluated for approval by the employee's supervisor/designee.
6. For all approved external research studies, HCPSS will make public the researcher name, institution, contact information, project topic, and expected project completion date.

E. Training

1. School-based and Central Office administrators will be trained regarding the implementation of this policy to support their role in approving research projects and ensuring that HCPSS employees comply with procedures for conducting research in the school system and the procedures for protecting data privacy in any dissemination of information from research activities.

2. Appropriate personnel will be trained to ensure that HCPSS employees comply with procedures for screening, evaluating, approving, conducting, and disseminating research within the scope of this policy.

F. Rejection or Termination of Research

1. Violation of this or any HCPSS policy is grounds for immediate rejection of the research application or termination of the approved research.
2. Authorization to conduct research may be revoked if the researcher violates any standards or procedures outlined in this policy, or does not conduct the research in accordance with the researcher's approved proposal.
3. Authorization to conduct research may be revoked if HCPSS deems the study in progress is causing discomfort to research participants.

G. Out-of-Scope Items

The following items are out-of-scope of this policy. This does not imply that HCPSS condones these activities; these items require review and approval outside of this policy's standards.

1. Unless it meets the definition of research within the scope of this policy, requests for proposals (RFPs), Memoranda of Understanding (MOU), grant evaluation requirements, and other data sharing agreements between HCPSS and other organizations are out-of-scope. (Policy 3060 Student Data Governance and Privacy, Policy 6030 Procurement of Architectural and Construction Management Services)
2. Recruitment of HCPSS employees or students occurring outside of typical work hours for studies conducted outside of HCPSS and outside of typical work hours; as long as no PII or other identifying information about individuals, schools, or the district is collected or is shared in the dissemination of information gleaned.
3. Research studies using publicly-available information.
4. Activities deemed not to be research within the scope of this policy, such as oral history, journalism, biography, literary criticism, legal research, historical scholarship, quality assurance activities, customer satisfaction, and others.
5. HCPSS student projects that do not involve HCPSS students or HCPSS employees as subjects.
6. Surveys from professional organizations to its members, as long as no PII or other identifying information about individuals, schools, or the district is shared in the dissemination of information gleaned.

IV. Responsibilities

- A. The Superintendent/designee will:
1. Screen and evaluate external research proposals in accordance with this policy.
 2. Handle all communication with those proposing to conduct external research.
 3. Monitor the implementation of external research projects to ensure adherence to guidelines and timeframes.
 4. Maintain a record of all submitted external research materials and decisions. For approved external research, maintain a record of submitted research reports.
 5. Maintain a record of all approved action research materials submitted by supervisors/designees.
- B. Supervisors/designees will:
1. Supervise action research activities conducted by their direct reports.
 2. Evaluate and approve/reject dissemination of action research requests.
 3. Inform the Superintendent/designee of action research proposals that have been approved.
 4. Monitor implementation of approved action research proposals.
 5. Submit to the Superintendent/designee a copy of completed action research findings.
- C. HCPSS principals will ensure that appropriate teachers oversee that student-led research studies are of a high quality.
- D. The Superintendent/designee will collaborate with HCPSS executive leadership to communicate with and provide training to staff to ensure appropriate knowledge of this policy.

V. Delegation of Authority

The Superintendent is authorized to develop procedures for the implementation of this policy.

VI. Definitions

Within the context of this policy the following definitions apply:

- A. Action Research – Studies conducted by HCPSS employees and pre-service candidates/interns that involve improving normal educational practices and systematic reflections on their own work through the examination of job-embedded data. Action research will not adversely impact students' opportunity to learn required educational content, nor are these activities likely to adversely impact the evaluation of the employees who provide or support instruction.
- B. Anonymity – Assurance that research subjects not be identified by name, a subject's identity is protected, and an individual is unknown.
- C. Assent – The written affirmative agreement of an individual under the age of 18 years to participate in research.
- D. Confidentiality – Assurance that a researcher holds in confidence or keeps secret from the public any information collected during research that may include PII.
- E. Data Collection – The process of gathering and measuring information in a systematic fashion that enables one to answer stated research questions, test hypotheses, and evaluate outcomes. Methods of data collection include, but are not limited to:
 - 1. Questionnaires or Surveys: multiple choice or open-ended questions.
 - 2. Interviews and Focus Groups: formal and informal discussions.
 - 3. Observations: formal and anecdotal perceptions.
 - 4. Document Analysis: extant materials related to the research.
- F. Dissemination of Information – The reporting, sharing, presenting, or publishing of findings obtained from research activities.
- G. Educational Records – Records that are directly related to a student and that are maintained by an educational agency or institution or a party acting for or on behalf of the agency or institution. These records include but are not limited to grades, transcripts, class lists, student course schedules, health records, and student discipline files. The information may be recorded in any way, including, but not limited to, handwriting, print, computer media, videotape, audiotape, film, microfilm, microfiche, and e-mail. (34 CFR § 99.2)
- H. External Researcher – An individual or agency that seeks to engage in research that is not part of HCPSS job responsibilities or HCPSS classroom assignments.

External researchers include, but are not limited to:

1. For profit and not-for-profit organizations, national study groups, federal/state/local agencies.
 2. HCPSS employees seeking to conduct research for purposes outside of job responsibilities (e.g., coursework, program requirements, personal interests, master's theses, doctoral dissertations).
 3. Non-HCPSS employees seeking to conduct research in HCPSS.
 4. HCPSS students seeking to conduct research that is not part of their regular classroom assignments and/or that will be disseminated beyond HCPSS.
 5. Non-HCPSS employees or entities that enter into an agreement with HCPSS that include research activities as defined in the scope of this policy as part of the agreement.
- I. Informed Consent – Process that takes place between a researcher and a potential participant that includes full disclosure of the nature of the research and the participant's involvement, assurance of adequate comprehension on the part of the potential participant, written documentation of the participant's voluntary choice to participate.
- J. Institutional Review Board (IRB) – A committee within an academic institution that reviews proposed research involving human subjects to ensure the research meets federal guidelines for ethical conduct for the protection of human subjects.
- K. Internal Researcher – An individual employee or unit within HCPSS (or an individual or unit under contract with HCPSS) seeking to conduct research as part of their job responsibilities or as directed by HCPSS leadership. Includes HCPSS students who are engaged in research as part of an HCPSS course requirement.
- L. Job-Embedded Data – Information that is collected as an aspect of one's assigned role or function.
- M. Minimal Risk – The probability and magnitude of harm or discomfort anticipated in the research are not greater than those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations or tests.
- N. Parent – Any one of the following, recognized as the adult(s) legally responsible for the student:
1. Biological Parent – A natural parent whose parental rights have not been terminated.
 2. Adoptive Parent – A person who has legally adopted the student and whose parental rights have not been terminated.

3. Custodian – A person or an agency appointed by the court as the legal custodian of the student and granted parental rights and responsibilities.
 4. Guardian – A person who has been placed by the court in charge of the affairs of the student and granted parental rights and responsibilities.
 5. Caregiver – An adult resident of Howard County who exercises care, custody, or control over the student but who is neither the biological parent nor legal guardian, as long as the person satisfies the requirements of the Education Article, §7-101(c) (Informal Kinship Care) or has been issued a U.S. Department of Health and Human Service’s Office of Refugee Resettlement (ORR) Verification of Release form entering into a custodial arrangement with the federal government.
 6. Foster Parent – An adult approved to care for a child who has been placed in the home by a state agency or a licensed child placement agency as provided by the Family Law Article, §5-507.
- O. Personally Identifiable Information (PII) – Any information that, alone or in combination, would make it possible to identify an individual with reasonable certainty.
- P. Research – A structured and systematic investigation designed to refine or test a hypothesis or assess a theory that uses observational, experimental, and/or data collection methods to provide reliable, valid, replicable, and generalizable findings. Data could include originally collected data or data that have already been collected through primary sources.
- Q. Student-Led Research – Research conducted as part of an HCPSS student’s HCPSS coursework and supervised by an HCPSS teacher.

VII. References

- A. Legal
 National School Lunch Act, Public Law 79-396, Section 9 amended
 Family Educational Rights and Privacy Act (FERPA),
 20 U.S.C. §1232g; 34 C.F.R. Part 99
 Protection of Pupil Rights Amendment (PPRA), 20 U.S.C. §1232h; 34 C.F.R. Part 98
 COMAR 13A.08.02, Student Records
 The Annotated Code of Maryland, State Government Article, Section 10-616 and
 Section 10-617
 Family Educational Rights and Privacy Act (FERPA) Exceptions - 20 U.S.C.
 §1232g(b)and(h)–(j)and 34 CFR§
 Md. Family Law Code Ann. § 5-560 (2014)
- B. Other Board Policies
 Policy 2070 Ethics
 Policy 3050 Records Management

Policy 3060 Student Data Governance and Privacy
Policy 4000 Grants
Policy 6030 Procurement of Architectural and Construction Management Services
Policy 7010 Personnel Records
Policy 8120 Testing: State and Local Responsibilities and Protocols
Policy 9050 Student Records

C. Relevant Data Sources

D. Other

Application to Request Permission to Conduct Research in the HCPSS
Department of Health and Human Services: Office for Human Research Protection –
The Common Rule
HCPSS Research Requests Tracker
HCPSS Student Data Sharing Agreement

VIII. History¹

ADOPTED: September 26, 1974

REVIEWED: December 19, 2019

MODIFIED:

REVISED: July 8, 1982

October 25, 1990

September 7, 2006

February 12, 2015

December 7, 2021

EFFECTIVE: July 1, 2022

¹ Key: *Adopted*-Original date the Board took action to approve a policy; *Reviewed*-The date the status of a policy was assessed by the Superintendent's Standing Policy Group; *Modified*-The date the Board took action to alter a policy that based on the recommendation of the Superintendent/designee did not require a comprehensive examination; *Revised*-The date the Board took action on a policy that based on the recommendation of the Superintendent/designee needed a comprehensive examination; *Effective*-The date a policy is implemented throughout the HCPSS, typically July 1 following Board action.

**RESEARCH IN THE HOWARD COUNTY
PUBLIC SCHOOL SYSTEM**

Effective: July 1, 2022

I. Screening, Review, Timeline, and Reporting of External Research Requests

For external research proposals governed by Policy 3030, the following provisions apply:

- A. For research proposals that meet criteria to be considered for review as described in Policy 3030 Section III.A., external researchers may access the application form on the HCPSS website. Research proposals will be screened and the types of research described in Policy 3030 Section III.B.4. will not be reviewed or approved.
- B. Items deemed out-of-scope under Policy 3030, Section III.G. will not be considered under this process. If the Superintendent/designee receives requests to review these types of items, the Superintendent/designee will forward these items to the appropriate Howard County Public School System (HCPSS) office for consideration.
- C. Research proposals submitted for approval will be sent to the Superintendent/designee in the form of a completed Application to Request Permission to Conduct Research in the HCPSS, which will include the following:
 - 1. The applicant's qualifications to conduct high-quality research as outlined in Policy 3030, Section III.A.4. through 7.
 - 2. A list of all researchers and personnel who are to be involved and their qualifications and roles. Qualifications should include each personnel's successful completion of learning modules provided by the Superintendent/designee related to protecting human subjects and adhering to data privacy laws and regulations as outlined in Policy 3030 Section III.A.7.
 - 3. A detailed research proposal that includes a clear research question that refines or tests a hypothesis or assesses a theory, rationale for the study, and detailed justification of how the research findings would support current HCPSS goals, priorities, and initiatives.
 - 4. A thorough description and justification for the proposed research methodology, including a research design that takes into account the need to eliminate any potential power differential between the researcher and research subjects, or perceived and real authority of the researcher over the

research subjects. Proposed methods also delineate the study sample, study design, instrumentation, data collection, and data analysis plan.

5. A thorough description of the proposed data points that will be requested and/or collected, as well as how the data collected will be safeguarded and maintained, and when and how the data collected will be destroyed.
 6. A thorough description of how findings will be reported to maintain the confidentiality and anonymity of participants and avenues by which study findings are intended to be disseminated.
 7. Copies of all research materials (e.g., questionnaires, interview protocols, surveys, procedures, recruiting materials, and informed consent and assent forms) that will be used.
 8. An estimate of the number of HCPSS schools, teachers, students, and/or other school system employees that are proposed to be involved.
 9. A detailed estimate of the time and burden required of students, teachers, and other school system employees involved, including the time that students will miss classroom instruction in order to participate; along with a justification for how HCPSS will benefit from this study.
 10. A timeline that includes: the timeframes for conducting the research, collecting and analyzing data; the estimated date for submitting the final report, the executive summary, and an interim report if applicable; and any justification for maintaining the data beyond the end of study completion, if applicable.
 11. For proposals involving human subjects: Institutional Review Board (IRB) decision letter. Only those proposals that are reviewed by an IRB and have an IRB letter either approving the research or exempting the research from IRB review will be considered for approval in HCPSS.
 12. Applicant's and, if appropriate, supervising researcher's curriculum vitae.
- D. All researchers who will be conducting research at any HCPSS location are required to complete a criminal background investigation and obtain clearance from HCPSS before beginning their research, in accordance with Md. Family Law Code Ann. §5-560. A list of the external researchers and their approved research timeframe will be maintained by the Superintendent/designee and shared with the HCPSS Office of Human Resources.
- E. All proposals to be considered during any given school year will be received at least twelve (12) calendar weeks prior to the desired starting time.

- F. Research proposals that have all completed documentation will be reviewed within one (1) calendar month.
- G. The research proposal will initially be reviewed by the Superintendent/designee. In addition, the appropriate curricular and/or program departments will provide input in order to determine the benefit-burden balance and suitability of the research, adherence to high-quality research standards as noted in Section I.A., and risks to data privacy. If proposals involve specific schools, the supervisor of principals, the principals and appropriate staff of those schools will also provide input.
- H. The Superintendent/designee will contact the principals of the schools and/or leaders of the offices named in the proposed research to obtain their approval as part of the review process. As part of this approval, principals and/or leaders of the offices named in the proposed research agree to assign an employee as the point of contact to monitor that the research is conducted as approved.
- I. The Superintendent/designee may request clarification and additional information from the researcher as part of the application review process.
- J. If educational records are requested as part of the research proposal, the Superintendent/designee will consult with appropriate HCPSS and/or educational data privacy subject matter experts to determine if those data could be shared according to the Family Educational Rights and Privacy Act (FERPA) regulations. Under FERPA, only properly de-identified data and only under certain exceptions may educational records be shared without written parental consent.
- K. Using the input and recommendations from the reviewers, the Superintendent/designee will approve or reject the research proposal based on the standards and procedures outlined in this policy. A letter will be sent to the researcher to notify them of the decision.
- L. If approved, the research approval letter will contain conditions under which the research is approved. The researcher must comply via written agreement with all conditions to conduct research in HCPSS. These conditions may include the following:
 - 1. Data maintenance requirements (e.g., safeguarding, destruction schedule).
 - 2. HCPSS Student Data Sharing Agreement completion requirement.
 - 3. Data privacy and protection requirements, including proper de-identification of any employee and student data, as well as de-identification of any school and the school system, in reporting findings.
 - 4. Confidentiality considerations and requirements.

5. Considerations and parameters for use of HCPSS resources (for HCPSS employees only).
 6. Requirements for mitigation of dual role (for HCPSS employees only).
 7. Necessary changes in order for the research to be approved.
 8. Logistical considerations, including assigning a point of contact (if necessary) and communication/correspondence expectations.
 9. Timeframe to conduct approved research activities.
 10. Expectations for sharing of results with HCPSS.
 11. Requirement that if the researcher would like to make changes to the study design after this approval, the researcher must submit a new application to request permission to conduct research in HCPSS.
 12. Requirement for the inclusion of this approval letter specifying the conditions under which the study is approved in initial communications with HCPSS employees, students, and families.
 13. Signature of primary investigator and the applicant, indicating their understanding of and commitment to adhere to the conditions stated in the letter and all HCPSS policies and procedures.
- M. All approved research will be completed within the approved timeline. If research is not completed within the allotted time period, the researcher will apply for an extension and obtain approval from the Superintendent/designee in order to extend the research timeline. If the research involves specific schools and offices, the principals and appropriate HCPSS employees of those schools and offices will be asked for input regarding the researcher's request for an extension.
- N. All approved research will be conducted as approved in the proposal. If modifications to the approved research proposal are needed, researchers will apply for a modification and obtain approval from the Superintendent/designee. If the research involves specific schools and offices, the principals and appropriate HCPSS employees of those schools and offices will be asked for input regarding the researcher's request for modification.
- O. Within the timeframe specified in the approved research proposal, the researcher will submit an interim report if applicable, a final report, an executive summary, and a verification of proper data disposal to the Superintendent/designee and any offices specified in the approval letter.
- P. Within thirty (30) calendar days from the end of the approved research activities timeframe, the Superintendent/designee will send a letter to the researcher

indicating that the approved study period is over and all research activities must cease.

- Q. At the end of each school year, researchers who have not submitted documentation as specified in Section I.O. in the required timeframe will be contacted and made aware that their permission to conduct research in HCPSS is on hold and any future research requests will not be reviewed until reporting requirements have been met.

II. Approval Process, Timeline, and Reporting of Requests to Disseminate Information Obtained from Action Research

For requests to disseminate information obtained from action research as governed by Policy 3030, the following provisions apply:

- A. The HCPSS employee's immediate HCPSS supervisor will act as the Superintendent's designee. For HCPSS pre-service candidates/interns, their HCPSS site supervisor's immediate supervisor will act as the Superintendent's designee.
- B. Requests to disseminate information obtained from action research submitted for approval under this provision will be sent to the appropriate immediate HCPSS supervisor, and will include the following:
1. A statement that the HCPSS employee or pre-service candidate/intern was the one who conducted the research activities as part of a systematic reflection on their own professional practices, and that the HCPSS supervisor was aware of this action research.
 2. A high-quality research description that includes a clear research question, rationale, and justification of how this research is grounded in the HCPSS employee's or pre-service candidate/intern's job-embedded professional learning and involves normal educational practices that are not likely to adversely impact students' opportunity to learn required educational content, nor are these activities likely to adversely impact the evaluation of the employees who provide or support instruction.
 3. A thorough description and justification for the research methodology, including a research design that takes into account the need to eliminate any potential power differential between the researcher and the research subjects, or perceived and real authority of the researcher over the research subjects. The research methodology description also includes measures used and the data analysis steps.
 4. A thorough description to demonstrate that the data collected were job-embedded data that did not interrupt typical teaching and learning or operational processes. If educational records are requested as part of the

research proposal, the Superintendent/designee will consult with appropriate HCPSS and/or educational data privacy subject matter experts to determine if those data could be shared according to FERPA regulations. Under FERPA, only properly de-identified data and only under certain exceptions may educational records be shared without written parental consent.

5. A thorough description of how the findings will be properly de-identified and reported to maintain the confidentiality and/or anonymity of participants, how data collected will be safeguarded, and avenues by which study findings are intended to be disseminated (e.g., professional conference, journal article).
 6. Copies of all action research materials used (e.g., questionnaires, interviews protocols, surveys, procedures, recruiting materials, and informed consent and assent forms, as appropriate).
 7. At the end of each semester, HCPSS supervisors will submit to the Superintendent/designee all approved or denied requests to disseminate information obtained from action research during that period. Summer requests may be submitted following the subsequent semester.
- C. Using the application materials submitted, the HCPSS supervisor will approve or deny the request based on the standards and procedures outlined in Policy 3030 and these Implementation Procedures, and send a letter to the researcher to notify them of the decision. The HCPSS supervisor will copy the Superintendent/designee on these letters.
- D. If approved, the action research findings dissemination approval letter will contain conditions under which the request is approved. The researcher must comply via written agreement with all conditions to disseminate action research findings. These conditions include the following:
1. Data privacy and protection requirements in reporting findings, including proper de-identification of any employee and student data, as well as de-identification of schools and the school system.
 2. Considerations and parameters for use of HCPSS resources.
 3. Expectations to get HCPSS supervisor sign-off on final draft prior to dissemination of action research findings.
 4. Signature of the HCPSS employee or pre-service candidate/intern requesting permission to disseminate information obtained from their action research, indicating their understanding of and commitment to adhere to the conditions stated in the letter.

III. Data Governance Before, During, and After Completion of Approved Requests

- A. Per FERPA, properly de-identified data may be shared without written parental consent. Otherwise, any disclosure of educational records from HCPSS to researchers requires prior written parental consent.
- B. While conducting approved research activities, all research personnel must safeguard any data obtained or collected. Data safeguarding strategies include data file encryption and proper de-identification of subjects in the data files.
- C. At the conclusion of the research study or at the time agreed upon, the researcher will submit to the Superintendent/designee a signed form certifying that data obtained or collected as part of the approved research have been cleared, purged, or destroyed.
- D. External researchers must complete the HCPSS Student Data Sharing Agreement prior to (a) gaining access to or (b) collecting student data.

IV. Violation of Policy

If a research incident arises, the Superintendent/designee will call together a response team to:

- A. Assess the potential incident;
- B. Take coordinated action, which may include automatic rejection of the research application or immediate termination of the research;
- C. Notify the researcher-in-question and appropriate supervisory personnel (e.g., IRB, principal investigator, university advisor, direct supervisor) and determine corrective actions (e.g., destroy data collected), if any; and
- D. Use the lessons learned from the incident response to improve the processes of identifying, defending, detecting, responding to, and recovering from future potential incidents.

V. Training HCPSS Employees

The Superintendent/designee will appoint HCPSS subject matter experts to provide training to HCPSS employees on the following topics. Training is required only for supervisors who need to review action research dissemination requests, as noted in Section III.B.3. of Policy 3030. Training includes but is not limited to:

- A. Awareness of Policy 3030 and HCPSS employees' roles in the implementation procedures. For example, the Superintendent/designee may send an email annually to all employees to highlight Policy 3030 and the conditions under which external researchers may contact HCPSS employees to recruit them for research.

- B. How to properly de-identify data, as well as a basic understanding of FERPA and PPRA regulations related to student data collection and sharing practices.
- C. Guidelines for supervisors when reviewing action research dissemination requests to determine approval or denial in accordance with Policy 3030, as well as expectations to communicate with the Superintendent/designee as outlined in the implementation procedures.
- D. Guidelines regarding appropriate use of system resources and role boundaries in the context of research as defined within the scope of this policy.
- E. Awareness of HCPSS offices to contact when Superintendent/designees have questions regarding implementation of this policy.

VI. Monitoring

Policy 3030 implementation procedures will be overseen by the Office of the Deputy Superintendent.

VII. History¹

ADOPTED: October 25, 1990
REVIEWED: December 19, 2019
MODIFIED: October 10, 2013
REVISED: September 7, 2006
June 14, 2007
June 11, 2009
February 12, 2015
December 7, 2021
EFFECTIVE: July 1, 2022

¹ Key: *Adopted*-Original date the Board took action to approve a policy; *Reviewed*-The date the status of a policy was assessed by the Superintendent's Standing Policy Group; *Modified*-The date the Board took action to alter a policy that based on the recommendation of the Superintendent/designee did not require a comprehensive examination; *Revised*-The date the Board took action on a that policy based on the recommendation of the Superintendent/designee needed a comprehensive examination; *Effective*-The date a policy is implemented throughout the HCPSS, typically July 1 following Board action.