Guidelines for Requests to Conduct Primary Research in Chicago Public Schools

DISCLAIMER: Chicago Public Schools (CPS) reserves the right to modify the Research Review Board (RRB) Guidelines as needed. Therefore, CPS reserves the right to request changes to new RRB submissions and to multi-year approved research proposals at any time.
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The Chicago Public Schools’ Research Review Board

The Research Review Board (RRB) acts on behalf of the Chief Education Officer to review research proposed by external and board contracted researchers. The RRB is comprised of members from various Chicago Public School (CPS) offices. These guidelines are meant to provide researchers with a clear understanding of the research encouraged within CPS and procedures for submitting a research proposal for review.

There is no right to access Chicago Public Schools students, staff or data for research purposes. Access may be granted when determined to be in the best interests of the Board. If access is granted, Researcher may only access schools, students, staff and data relevant to the research as approved by the RRB.

Principles

- Preventing the undue disruption of the educational process.
- Protecting the privacy of students and staff and ensuring compliance with state and federal law. The Federal Educational Rights and Privacy Act (FERPA) and the Illinois School Student Records Act are based on the idea that information about an individual student is private and confidential and generally may only be accessed with parent consent. The Chicago Public Schools Board Policy on Parent and Student Rights of Access to and Confidentiality of Student Records is consistent with the state and federal law, ensuring the confidentiality and protection of student record files.

Important Policies to Review

Research Study and Data Policy
http://policy.cps.k12.il.us/documents/203.4.pdf

CPS Parents and Student Rights of Access to and Confidentiality of Student Records
http://policy.cps.k12.il.us/documents/706.3.pdf

Family Educational Rights and Privacy Act (FERPA)

The Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule
http://privacyruleandresearch.nih.gov/
Types of Research

Research

Research includes various evaluation, measurement and inquiry activities that include, but are not limited to: (1) the systematic investigation, including research development, testing and/or evaluation, designed to develop or contribute to general knowledge; (2) collecting and analyzing of information aimed at discovering new facts and their correct interpretation to draw conclusions; and (3) 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 and analysis of cost and management records.

Internal Research

Internal research involves board employees who plan to conduct research on how to improve Board services and programs within their area of supervision or contract as part of a work assignment or as part of their general job duties. Internal researchers must obtain the prior approval of their supervisor prior to commencement of research activities. This explicitly excludes research towards a master’s thesis or dissertation. While research to improve Board services and programs does not require the approval of the CPS Research Review Board, student level data must be requested through a formal data request (see: www.cps.edu/research).

Board Contracted Research

Research conducted by Board contractors in accordance with their contract with the Board or a memorandum of understanding with a CPS department or school. All board contracted researchers must submit a full proposal to the CPS Research Review Board. In addition to the research proposal requirements, board contracted researchers must include a copy of their board contract or memorandum of understanding detailing the research activities.

External Research

External research includes (1) independent research conducted by individuals, organizations, or agencies not affiliated with the Board; (2) research conducted by Board employees for personal purposes outside of their work duties and/or work hours, (e.g. research for the completion of a master’s thesis or doctoral dissertation or for any other personal purposes); or (3) product research conducted by company or entity to study a product’s effectiveness for potential sale to the Chicago Public Schools. Special note on Charter and Contract school staff: Although Charter and Contract school staff are not CPS employees, students at these schools are CPS students and therefore research on these students must follow these guidelines.
External researchers must submit a full proposal (outlined in this document) if they propose to conduct research. All board contracted researchers must submit a full proposal to the CPS Research Review Board. In addition to the research proposal requirements, board contracted researchers must include a copy of their board contract or memorandum of understanding detailing the research activities.

A. Research Review Process for External Research

The Research Review Board is comprised of members representing various central office departments as well as the Law Department. The RRB meets monthly to evaluate all forms of requests (i.e. new proposals for research, resubmissions and continuing projects) to conduct research. Decisions resulting from the research review process will be emailed to the applicant of the request as well as appropriate CPS staff after the review meeting. External researchers may not begin any research activities or obtain data for research purposes without first following the procedures outlined in this policy and securing the necessary approvals.

B. Criteria for Evaluating Research Proposals

In addition to complying with CPS Board policy, federal and state laws and regulations, proposed research should also:

- Demonstrate educational value, either to the Chicago Public Schools directly or as a contribution to the profession of education.
- Manifest a sound research methodology using valid and reliable techniques and the research capacity and experience to successfully complete the project. Studies judged as poorly designed or justified may be rejected by the committee.
- **Research proposals will be reviewed when the applicant submits all required information and any additional documentation as requested by the Research Review Board.**

C. Research Restrictions

The following are important CPS and RRB policies to consider in selecting participating schools, in determining recruitment and data collection procedures, and in providing compensation for participation.

- There must be minimal interference with school instruction and operations and relationships between students, parents and school and district staff. Personal, social, psychological or medical research that may be in conflict with the rights of individuals or groups will not be approved.
• It is important to note that no CPS staff time or resources (i.e. CPS email or mail run) should be used to solicit participation in the research study. In addition, the RRB will not grant permission for the use of CPS school buildings for data collection. This arrangement must be made with the school principal.

• CPS cannot be used to recruit participants for research. **School staff may not be utilized to collect data.**

• Any compensation provided for participation in research must be described. It is acceptable for proposals to include compensation for CPS students who participate in research projects. However, it is against CPS Board policy for CPS staff to receive compensation for their participation in research projects during school hours. CPS staff participating in research activities outside contract hours may receive a total reward of up to $50. If the research takes place in schools, any compensation exceeding this amount may be given to the school. Note that for proposals that include professional development outside of contract hours for teachers, it is appropriate to provide reasonable compensation for participation.

• Researchers may not request data directly from schools or departments. All data requests must be submitted to central office for handling. Researchers may not receive personally-identifiable student level data unless the Researcher also provides central office with written evidence that the parent or student, as appropriate, has consented to the release of student records (see: www.cps.edu/research).

• Research conducted by a CPS employee:
  o Must occur outside of normal work requirements including for the completion of a master’s thesis or dissertation, and data collection cannot occur in the same school in which the employee has authority.
  o May not include research on individuals known to the researcher. Researchers must use independent research subjects in their studies. For example, principals cannot collect data from staff in their schools because this would present a conflict of interest. Similarly, teachers cannot collect data from their current or former students.

• The RRB may place additional conditions on an external researcher as deemed necessary including but not limited to requirements related to insurance and criminal background checks. The RRB’s approval of an external research project may be withdrawn for any reason at any time.
D. Graduate Student Research Screening Process

Graduate students, including master’s students and doctoral candidates, who seek to conduct research within Chicago Public Schools for the purposes of fulfilling an academic requirement such as a master’s thesis or a dissertation must complete the Graduate Student Research Screening Process prior to applying to conduct new research in the district. The Graduate Student Research Screening Process does not take the place of the New Research Application process; it is a step that must be completed prior to beginning the New Research Application process. If the submitted materials are cleared, then the applicant may continue on to the New Research Application process. If the submitted materials are rejected, the applicant may not conduct nor apply to conduct his/her research within Chicago Public Schools.

We strongly encourage submission of Graduate Student Research Screening documents 90 days in advance of when you plan to begin your research. The Graduate Student Research Screening Form (available at www.cps.edu/research) should be completed, and emailed (along with all supporting documents) to research@cps.edu. Graduate Student Research Screenings are reviewed on a rolling basis; decisions should be expected within two weeks of submission.

All Graduate Student Research Screening submissions must include the following:

1. Executive Summary or Abstract
   - Synopsis of the proposed research including research purpose, individuals (i.e.: students, teachers, etc.) included in research and length of time data collection is to take place (no more than 200 words).

2. University, Department, Thesis/Doctoral Advisor and contact information
   - Identify the institution with which you are affiliated and the person within that institution who is supervising, overseeing, or advising you in your research.

3. Chicago Public Schools Affiliation
   - If you are a Chicago Public Schools employee, or if you are a service provider within Chicago Public Schools, identify your affiliation with Chicago Public Schools.

4. Research Question / Hypothesis / Methodology
   - A brief summary of the research questions to be addressed and a description of the hypothesis must be provided.

5. Justification of Chicago Public Schools as Research Site
   - Brief explanation of why research needs to be conducted with Chicago Public Schools.

6. Description of Research Activities
   - A summary of the research protocol including how data is to be collected and by whom, from whom will data be collected and any involvement that CPS staff may have in the actual collection of data. This also includes a description of who is to be recruited to participate and how recruitment will take place.

7. Draft(s) of Survey Instruments, Interview Protocols, other Research Documents
E. Research Proposal Requirements

All requests to conduct research within the Chicago Public Schools must be submitted online and in print by the final submission date in order to be reviewed at the following meeting. We strongly encourage submission of requests 60 days in advance of proposed research commencement. A list of scheduled meetings and the submission deadline for each is provided on the website. The Research Proposal Checklist (see Appendix) should serve as the cover page for research proposals. Six (6) copies of the research proposal with all supplemental materials must be mailed and received by the deadline. Materials should be mailed to:

Chicago Public Schools Attn: Research Review Board
Office of Planning and Data Management
42 W. Madison Street
2nd Floor
Chicago, Illinois 60602

We strongly advise you to submit materials by mail. If there are special circumstances which necessitate in person delivery of materials, please be advised that you must bring a valid ID with you when you come to our office location. Any researchers bringing materials will need to check in with reception, indicating that he/she is seeking to submit materials to the Research Review Board, care of the Office of Accountability. Someone will meet you in the lobby to receive your materials.

The online RRB application form and RRB continuing review and modification application form can be accessed at www.cps.edu/research. All research proposals must include the following:

1. Executive Summary or Abstract
   Synopsis of the proposed research including research purpose, individuals (i.e.: students, teachers, etc.) included in research and length of time data collection is to take place (no more than 200 words).

2. Researcher status and title
   Statement naming primary investigator, title and status (i.e.: student, professor, director, etc.) within institution or organization. CPS employees must disclose CPS employment status and position in this section.

3. Research question, hypothesis and methodology
   A brief summary of the research questions to be addressed and a description of the hypothesis must be provided. Appropriate research methods must be used.

4. Purpose of the research and Literature Review / Justification of Research
   A brief (1-2 pages) summary of literature supporting the proposed research must be provided.

5. Description of the direct benefit to the Chicago Board of Education or CPS and/or...
profession of education
Clearly describe why research is valuable to CPS and how it would contribute to profession of education.

6. Description of research activities and school/student/staff involvement
A thorough description of the research protocol including how data is to be collected and by whom, from whom will data be collected and any involvement that CPS staff may have in the actual collection of data. Time needed to participate in each research activity must be detailed. This also includes a detailed description of who is to be recruited to participate and how recruitment will take place.

7. Timeline of research
Timeline of research must include start and end date of all research activities and data collection. Researcher should also clearly outline the amount of time necessary to complete data collection. Research proposals should be submitted at least 60 days in advance of the start of data collection to allow for proposal review and revisions. Please note that if research activities exceed one year beyond date of proposal approval, an extension must be submitted using the Modified & Continuing Review Checklist (see Appendix).

8. Institutional Review Board approval
If the research includes an intervention or interaction with a living person (i.e., student, teacher or parent) that would not occur but for the research, or if the researcher will obtain identifiable private data or information, then the researcher must get advance approval from an Institutional Review Board (IRB). Surveys, interviews, videotaped observations, questionnaires and reviews of student files are all interventions or interactions that would require IRB review. Research that is typically exempted from IRB must include an exemption letter.

An IRB is generally associated with colleges or universities. The IRB evaluates whether the risk to the subjects of the research is reasonable in relation to the potential benefit [21 CFR 56.111(a)(2)] and, if the research is approved, will specify whether the researcher needs to obtain informed consent from the subjects of the research. A researcher’s lack of affiliation with a college, university, or other institution with an IRB, does not remove the IRB review requirement from the Research Review process.

The fact that an IRB has approved a proposal for research does not mean that CPS must approve it. IRB approval only means that the proposed research design is in compliance with the federal regulations regarding human subject research (which are consistent with Illinois law and CPS policy). CPS may determine that IRB-approved research does not warrant CPS support for the
reasons previously described.

10. Copy of any survey or other instruments
This includes any assessments administered to students. For online surveys, a listing of the items and a link to the online survey is required.

11. IRB approved and stamped copy of the informed parent consent form(s).
All external research surveys, assessments, analyses or evaluations require the prior written and active informed consent of a parent or legal guardian on behalf of a minor student before data collection commences. Regardless of the sponsoring university or agency’s requirements, parent consent form must be written in easily understood language and should provide the following information:

- Title of the study and identification of the researcher(s) conducting the study (e.g., doctoral candidate at Loyola University);
- The purpose(s) for collecting data (e.g., to learn about foreign language acquisition in primary school students);
- Description of what participants will be asked to do (e.g., complete a written survey, respond to a group interview with eight other students);
- Amount of time required of participants;
- Notice that participants will be audio- or videotaped (if applicable) with an explanation of how the recordings will be used and what happens to the tapes after the research is completed;
- Description of any individually-identifiable student data to which the researcher seeks access (e.g., test scores, attendance records, address and phone number) and how and when data will be destroyed. There must also be a separate yes/no check box referring to the release of student level data;
- Notice that all information will remain confidential;
- Notice that participation is entirely voluntary and participants may withdraw from the study at any time, without negative consequences;
- Notice of any reasonably foreseeable risks or benefits to the participant;
- A local (312/773) or toll free telephone number of researcher(s), so that the parent or participant may call if there are questions or concerns;
• Space and lines for the student’s name and parent/guardian signature. There must be a check-off for either consent or refusal to participate and the parent signature must refer to “Yes, I agree to have my child participate” or “No, I do not give consent for my child to participate”. Active consent, i.e., signature approving participation, is required under the federal Protection of Human Subjects regulations. Passive consent, failure to object after notice, is not sufficient.

• If the consent form is longer than one page, a summary of what participants will be asked to do and/or the student level data to be requested from CPS must appear immediately above the parent’s signature.

• In addition, the Protection of Pupil Rights Amendment (PPRA) passed under the No Child Left Behind Legislation requires that parents/guardians have access to the materials that will be used in school with their children. Therefore, all consent forms where there are research instruments must also include the following text, verbatim:

Parents please be aware that under the Protection of Pupil Rights Act. 20 U.S.C. Section 1232(c)(1)(A), you have the right to review a copy of the questions asked of or materials that will be used with your students. If you would like to do so, you should contact [INSERT APPROPRIATE CONTACT] at (XXX) XXX-XXXX to obtain a copy of the questions or materials.

Furthermore, researchers must have a plan to provide parents/guardians access to the surveys or materials that does not utilize CPS staff or resources. The phone number must be a local (312/773) or toll free number.

12. IRB approved and stamped copy of the student assent form
   Students who are between the ages of 12 and 17 (6th grade) are required to sign an assent form. This form should include many of the elements described above and the text of the form should be at an appropriate reading level to ensure students understand their participation in the research project. Please note, if your study includes students who are ages 18 or older, they must be provided with informed consent forms. The informed consent forms for students ages 18 or over must include all of the elements described above for parental consent form (except for the PPRA language).

13. IRB approved and stamped copy of the staff consent form
   Active informed consent forms must also be signed by any CPS staff asked to participate in research. Consent forms are to include all of the relevant elements described above.
Special notes on consent and assent forms

- If there is the possibility that parents and/or students speak and/or read in a primary language other than English, forms in appropriate alternative languages must be provided (e.g. Spanish language consent and/or assent forms).
- The researcher must retain all consent and assent forms, and must be prepared to make them available if a parent, teacher or school official questions a student's or staff member’s participation.
- To avoid any perceived coercion, the invitation to participate in research is to be printed on the researcher's stationery, and not on that of any office or school of the Chicago Public Schools. Consent and assent forms may not indicate CPS support or approval of the research study.

F. Approved Studies

Notice of Approval or Acknowledgement

If a research proposal is approved, the RRB will issue a research approval letter to the Researcher. The RRB will issue an acknowledgement letter to researchers who only are required to complete the Notice of Intent to Conduct Research form. The RRB’s approval of a research proposal is limited to the study scope and methods outlined in the proposal or Board contract. A researcher must provide a copy of the research approval letter (or acknowledgement letter) to principals whose schools will be affected by the research project to notify them of the RRB’s approval and, if applicable, the Board contract authorizing the research. If applicable, the researcher is also obligated to provide a list of all schools involved in the research within one month of beginning data collection.

Limited Approval

The RRB’s approval/acknowledgement of an external research study is conditional and subject to further approval by the school principal(s) and research subject(s) that form the basis for the proposed study. A principal may place restrictions on an External Researcher’s access to students and staff to minimize disruption to school activities.

Modifications

If a Researcher wishes to modify the research scope, methods or materially change the research activities (including surveys or other instruments or consent forms), the Researcher must obtain prior written approval of the modification from the RRB (see: the Modification & Continuing Review Process Coversheet in the appendix). For board contracted researchers, this obligation shall exist in addition to any other requirements regarding project modifications that may be specified in their contract or memorandum of understanding.
Duration

The RRB’s approval of an external research project will only be valid for a period of one year. If research activities extend beyond one year, the external researcher must request approval for an extension from the RRB (see: the Modification & Continuing Review Process Coversheet in the appendix). The RRB’s approval of a board contracted research project will be valid for the duration of the contract.

Upon completion of the research study, the researcher must send a letter to the RRB notifying the committee of completion of the study. A copy of the final report or summary of the results must be provided to the Research Review Board, to the principal of the school studied, and the CPS central office that provided a letter of support for the research proposal. The Chicago Public Schools Board of Education reserves the right to use the information in the research report or summary for educational programming or services, planning, solicitation of grants, staff development and any other purposes to improve instruction or services to students of the Chicago Public Schools. These reports must be emailed in PDF format to research@cps.edu or submitted by mail to the CPS Research Review Board.

Note on Rejected Proposals:

Proposals that are rejected by the Research Review Board are deemed by the board as having serious issues that likely cannot be addressed with a resubmitted proposal. Because of this, researchers whose proposals are rejected are not encouraged to resubmit their proposals. Should a researcher insist on resubmitting a proposal, s/he cannot do so for 2 review cycles.

G. Fee Structure

Fees for External Researchers

The Research Review Board is authorized under the Board’s Research Study and Data Policy (http://policy.cps.k12.il.us/documents/203.4.pdf) to establish reasonable fees to charge researchers for the review and evaluation of proposals and the compilation of requested data. Effective July 15, 2008, fees for external researchers will be assessed.

Rationale for Charging Fees

CPS, through its website (http://cps.edu/SchoolData/Pages/SchoolData.aspx), makes available to the general public aggregate data on many test scores and metrics. Researchers’ requests for additional aggregate or student-level data often require an investment of staff time to define the parameters of the request and to write computer programs to pull the requested data. CPS receives more than a hundred such requests each year.
The Board is interested in facilitating new knowledge acquisition through educational research, but also must balance this interest with compliance with federal and state laws as well as ensuring the research will cause minimal disruption to the school environment. Currently, the RRB receives approximately 10-15 research proposals each month that an internal Research Review Board (RRB) must review. In order to help alleviate the financial burden that these activities create, the fee structure below will apply to data requests and research proposals submitted to the RRB.

**Applicable to External Researchers Only**

Under the policy, researchers can be considered either a board contracted researcher or an external researcher. The fee structure will apply only to external researchers.

**Fee Structure for Data Requests**

In making a formal data request, the external researcher must complete the RRB data request form and submit this with proof of parental consent/student assent if applicable along with a processing fee of $50. This fee offsets the cost of reviewing and specifying the parameters of the work to be performed by staff.

Upon receipt of the formal data request, a staff member will contact the requestor and discuss the details of the request. During this process, CPS will generate an estimate of the number of staff hours and the total cost of filling the request. Staff time is billed at $100 per hour. Data requests serviced in the past have taken from as few as two hours to as many as eighty hours to fill depending on the scope and complexity of the task. During this process, CPS and the requestor will also agree upon a timeline for filling the request. Generally, requests can be filled in four to six weeks depending on the current workload of CPS staff.

**Fee Structure for Submission of Proposals**

A processing fee of $50.00 also applies to each submission of a research proposal to the RRB. If the RRB requests that the proposal be resubmitted with revisions, no new fee will be assessed upon resubmission. However, if the RRB rejects a proposal and the researcher submits the rejected proposal again, then the researcher will be assessed a new processing fee. The RRB will not review the same proposal more than three times in any twelve-month period.
# Research Proposal Coversheet

<table>
<thead>
<tr>
<th>Proposal Title:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Researcher Name (Include Title):</td>
<td></td>
</tr>
<tr>
<td>Organization:</td>
<td>Subject:</td>
</tr>
<tr>
<td>Address:</td>
<td></td>
</tr>
<tr>
<td>Phone:</td>
<td>Email:</td>
</tr>
</tbody>
</table>

**Indicate which of the following individuals will be participants in this study:**

- [ ] Students
- [ ] Teachers
- [ ] Other staff

**Six (6) copies of the research proposal are required.**
Each copy must include the following:

- Executive Summary or Abstract
- Researcher status and title
- Purpose of Research and Literature Review / Justification of Research
- Description of the benefit to CPS and/or general knowledge
- Research question and hypothesis
- Timeline of research
- Description of school/student/staff involvement
- Institutional Review Board approval documentation
- Copy of any survey or other instruments
- Copy of informed consent forms for parents and/or teachers as appropriate
- Copy of informed consent forms for students ages 18 or over as appropriate
- Copy of student assent form for students who are ages 12-17 (6th grade) as appropriate
- Fee enclosed for processing

**Send materials to:**
Chicago Public Schools
Office of Planning and Data Management Attn: RRB
42 W. Madison Street
2nd Floor
Chicago, IL 60602

**Office Use Only:**
Proposal ID ___ ___ ___ ___  Received: ___ ___/___ ___/___ ___  Payment Received: ________
**Modification & Continuing Review Coversheet**

Complete and submit 1 copy if:
- there are changes to your approved proposal or
- if your research extends beyond one year after the original approval date.

<table>
<thead>
<tr>
<th>Proposal Title:</th>
<th>Today's Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Researcher Name:</td>
<td>Original Approval Date:</td>
</tr>
<tr>
<td>Organization:</td>
<td>Proposal ID #</td>
</tr>
<tr>
<td>Address:</td>
<td></td>
</tr>
<tr>
<td>Phone:</td>
<td>Email:</td>
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</tbody>
</table>

Indicate purpose of this submission (select all that apply):

- **Extension needed**
  
  Extensions will only be granted one year at a time. The IRB renewal letter must be provided. If there are modifications to the proposal, complete the section below and submit the changes.

- **Modification to original proposal**

  Indicate the portion of the proposal being modified (select all that apply):

<table>
<thead>
<tr>
<th>Research question or hypothesis</th>
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<tbody>
<tr>
<td>Study timeline</td>
</tr>
<tr>
<td>Study population</td>
</tr>
<tr>
<td>Recruitment methods or advertising</td>
</tr>
<tr>
<td>Methodology and/or procedures</td>
</tr>
<tr>
<td>Consent form(s) and/or the process by which consent is obtained</td>
</tr>
<tr>
<td>Survey/instruments</td>
</tr>
<tr>
<td>Type of data collected</td>
</tr>
<tr>
<td>Other (explain)</td>
</tr>
<tr>
<td>Fee enclosed for processing</td>
</tr>
</tbody>
</table>

Send materials to: Chicago Public Schools  
Office of Planning and Data Management Attn: RRB  
42 W. Madison Street  
2nd Floor  
Chicago, IL 60602

**Office Use Only:**

Continuance Review: _____/_____/_____

Letter Sent: _____/_____/_____