

# **Guidelines for External Research and Data Collection in Chicago Public Schools**

*Updated November 2021*

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## I. Overview

### A. Purpose of this document

These guidelines are meant to provide researchers with a clear understanding of the research encouraged within Chicago Public Schools (CPS), the procedures for submitting a research proposal for review, and the procedures for requesting secondary data. The Research Review Board (RRB) acts on behalf of the Chief Education Officer to review research proposed. The RRB is composed of members from various CPS offices.

There is no right to access CPS's students, staff or data for research purposes. Access may be granted when determined to be in the best interests of the Chicago Board of Education (the Board). If access is granted, the researcher may only access schools, students, staff and data relevant to the research as approved by the RRB.

### B. Types of research/data collection

Research includes various evaluation, measurement and inquiry activities that may be comprised of, 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. The CPS Board Research Study and Data Policy can be found [here](#).

### C. Primary Research

The RRB reviews primary research study proposals. *Primary research* refers to studies in which researchers are collecting research data from or about research participants. Data collection activities may take a variety of forms such as surveys, interviews, focus groups or observations. The "[III. Conducting Primary Research](#)" section explains the process for submitting primary research requests under "[A. Process](#)". In studies involving primary data collection, the Board *requires* active informed consent for all research participants, and, in the case of minor aged students, active parental consent. Further information regarding consent form requirements and suggestions can be found in the "[V. Essential Guidance](#)" section under "[A. Consent](#)" and "[B. Consent Form Checklist](#)."

Approval of a research study is valid for one (1) calendar year (including multi-year studies). At the end of one (1) year from the date of approval, research activities must cease unless researchers request and are granted an extension by submitting a request. Please note, the RRB's approval of an external research project may be withdrawn for any reason at any time.

## D. Secondary Research (Data Requests)

*Secondary research* is defined as the summary, collation, synthesis and/or analysis of data that have already been collected by another party. Secondary data can be either non-personally identifiable (aggregate data or data where the number of students is greater than ten (10) and any identifying information is removed) *or* personally identifiable (where the data is minimally aggregated at ten (10) or fewer students or are tied to students' personal identifying information).

CPS makes available a large amount of school and district level data on our website without any required approval or action by the researcher. These files are accessible [here](#). These data sets may be downloaded and used for secondary research purposes. For data not publically available online, researchers must submit a formal data request, as explained in the "[IV. Requesting Secondary Data](#)" section. Please note that CPS reserves the right to deny a portion or the entirety of a data request.

Research and program evaluation involving student level secondary CPS data requires active parental consent. For some programs providing direct services to students, with no primary data collection, it is possible to request existing secondary data from CPS when parental consent has been secured. However, parental consent forms must meet the requirements outlined in the "[V. Essential Guidance](#)" section under "[A. Consent](#)" and "[B. Consent Form Checklist](#)". Programs are strongly advised *not* to begin attempting to implement consent forms for secondary data requests until they have reviewed this information thoroughly. Any cases where requests are placed using forms that do not meet these criteria can be rejected.

If the research or program evaluation only uses existing secondary data (as listed below), and is not engaging in Primary Research, as described in [C.Research](#), it is not required to fill out an application to conduct primary research with the Research Review Board since there are no direct research activities occurring. All Secondary Data Requests should follow the procedures outlined in [IV. Requesting Secondary Data](#).

The following data may be requested from the cohort of *school, grade level and/or school year*:

- Assessments
- Attendance
- Misconduct and discipline data
- Demographics
- Grades and performance
- Graduation and enrollment status

See the "[Appendix A: Available Data](#)" section for a more detailed list of data available for request. When filling out the data request application you must be as specific as possible in describing the type of data you need. *We can only release student level data (review the definition [here](#)) that has been explicitly named in the consent form.* Please review the

[“IV. Requesting Secondary Data”](#) section for more information on the data request process.

## E. Legal and Policy Framework

Research activities conducted in CPS schools, or research where participants are recruited through or in connection with a CPS school, are covered by the CPS Research Study and Data Policy as seen [here](#). Research subjects who are covered by the research policies and review process include: students (both minors and students who are eighteen (18) years or older), parents/guardians and families, teachers, principals and other CPS staff members.

Research proposals must be compliant with all relevant state and federal laws, as well as CPS board policies. Essential policies which are highly encouraged for review include:

- Federal Statute: [Family Educational Rights and Privacy Act \(FERPA\)](#)
- Federal Statute: [Protection of Pupil Rights Amendment \(PPRA\)](#)
- Federal Statute: [Health Insurance Portability and Accountability Act \(HIPPA\) Privacy Rule](#)
- Illinois Statute: [Illinois School Student Records Act \(ISSRA\)](#)
- Illinois Statute: [Student Online Personal Protection Act \(SOPPA\)](#)
- CPS Board of Education Policy: [External Research Study and Data Policy](#)
- CPS Board of Education Policy: [Parents and Student Rights of Access to and Confidentiality of Student Records](#)
- CPS Board of Education Policy: [Acceptable Use Policy \(AUP\)](#)
- CPS Board of Education Policy: [New Student Online Personal Protection Policy](#)

## F. Research Review Board

The RRB reviews proposed research on behalf of the Board of Education (Board). No research activities may be conducted without obtaining approval from the RRB. The RRB is a cross-departmental committee facilitated by the Department of Research and Evaluation. The RRB meets quarterly to review new research proposals and make a determination of approval, non-approval or request further information and/or identify specific changes required to seek approval, based on the criteria outlined in these guidelines.

# II. Types of Research and Definitions

## A. Types of Primary Research

### 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.

### **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.

### **Special note on Charter and Contract schools**

Charter school communities are NOT under the jurisdictional purview of the CPS RRB. Unless a Charter Management Organizations (CMO) elects to delegate decision making to the CPS RRB concerning a particular research proposal, CMOs are empowered to make their own decisions regarding research in their schools.

### **Board Contracted Research**

*Board contracted research* is 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 RRB. 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.

## **B. Types of Secondary Research (Data Requests)**

### **Aggregate Data**

*Aggregate data* is group level data (school, district, statewide, etc.) containing average statistics on the group where the subgroup(s) is/are greater than ten (10). All aggregate level data is de-identified and active parental consent is not required to access this data. Please review the district's public, aggregate data page [here](#) before submitting your request for aggregate data. Please note that if you plan to request aggregate data for research purposes beyond what is available on our public data site, we may not be able to fulfill your request.

### **Student Level Data**

*Student level data* is identifiable information on any subgroup of students and/or data on subgroups that contain fewer than ten (10) students. CPS defines personally identifiable information by the definition provided by the National Center for Education Statistics (NCES). NCES defines *personally identifiable information* to include: (1) the name and address of the student and the student's family; (2) a personal identifier, such as the student's Social Security Number, student ID number, or biometric record; (3) other indirect information, such as the student's date and place of birth and mother's maiden name; (4) other information that, alone or in combination with other factors, is linked or linkable to a specific student that would allow a reasonable person in the

school community who does not have personal knowledge of relevant circumstances to identify a student with reasonable certainty; (5) and information based on a targeted request. *Removing a student's name and ID number does not necessarily render data unidentifiable.* Any request for student level data for research purposes requires active parental consent or a legal agreement.

### **III. Conducting Primary Research**

#### **A. Process**

##### **Research Review Board**

The RRB is composed of members representing various Central Office academic departments as well as the Law Department. The RRB meets quarterly to evaluate new proposals to conduct research. *The RRB calendar and deadlines for submissions can be found on the CPS Research Website [here](#).* Decisions resulting from the research review process will be communicated to the applicant of the request as well as appropriate CPS staff in accordance with the estimated timelines outlined in the respective RRB calendar. 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.

##### **Duration**

The RRB's approval of an external research project (review the definition [here](#)) will only be valid for a period of one (1) year. If research activities extend beyond one (1) year, the external researcher must request approval for an extension from the RRB. The RRB's approval of a board contracted research project (review the definition [here](#)) will be valid for the duration of the contract. Continuing review applications can be accessed within IRBManager after an active project has been created within the system. Details on how to submit a continuing review application can be found within the Navigating IRBManager documentation also posted on the CPS Research Website [here](#).

##### **Final Report**

Upon completion of the research study, the researcher will be prompted to submit a copy of the final report or summary of the results into IRBManager. It is required for this report to be submitted in order to close an RRB project and remain in compliance with the District. The Board 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 CPS.

#### **B. Criteria for Evaluating Research Proposals**

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

- Demonstrate educational value, either to CPS directly or as a contribution to the

field of education.

- Interrogates/challenges policies and systems that may be contributing to inequity (more details on the district's equity framework can be found here: <https://www.cps.edu/strategic-initiatives/equity-at-cps/>)
- Demonstrate community partnership, with evidence that the researchers have engaged members of the researched community on the purpose, design, and/or implementation of the research project
- Address an identified research priority of CPS and not duplicate research already occurring in CPS.
- Document that the researcher or organization has the capacity and experience to successfully complete the project.
- *Protect the privacy of students, families and staff members and ensure compliance with state and federal laws as well as CPS board policy.* The Federal Educational Rights and Privacy Act (FERPA) and the Illinois School Student Records Act (ISSRA) are based on the premise that information about an individual student is private and confidential and generally may only be accessed with parental consent.
- 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 RRB.

### **C. Application Process**

All requests to conduct research within CPS must be submitted within IRBManager by the posted submission date in order to be reviewed at the scheduled meeting. A list of scheduled meetings and the submission deadline for each is provided on the CPS Research Website [here](#).

A sample of a complete application is available [here](#).

Information requested in the application includes:

- 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 (200 words maximum).
- Researcher status and title
  - Statement naming primary investigator, title and status (i.e., student, professor, director, etc.) within an institution or organization. Any CPS employees must disclose CPS employment status and position in this section.
- Research question, hypothesis and methodology
  - Brief summary of the research questions to be addressed and a

description of the hypothesis must be provided. Appropriate research methods for the research questions must be used.

- Description of the researcher's commitment to equity and collaboration
  - Statement describing the ways the research project reflects / challenges / progresses the district's commitment to equity.
- Description of the direct benefit Board and/or CPS and/or the profession of education
  - Clearly describe why research is valuable to CPS specifically and how it would contribute to the profession of education (200 words maximum).
- Description of research activities and school/student/staff involvement
  - Thorough description of the research protocol, including how data is to be collected and by whom, from whom data will 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.
- Timeline of research
  - Timeline of research must include the start and end date of all research activities and data collection. The researcher should also clearly outline the amount of time necessary to complete data collection.
- Institutional Review Board (IRB) 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 IRB. Surveys, interviews, videotaped observations, questionnaires and reviews of student files are all interventions or interactions that would require IRB review and approval. Research that is typically exempted from IRB approval must include an exemption letter. Please review "[G. IRB Approval](#)" under "[V. Essential Guidance](#)" for more information about IRB approval.
- Copy of any survey and/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.
- IRB approved and stamped copy of the informed parental consent form(s)
  - All external research (review the definition [here](#)) 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.
- IRB approved and stamped copy of the student assent form(s)
  - Students who are between the ages of twelve (12) (sixth (6<sup>th</sup>) grade) and seventeen (17) are required to sign an assent form. This form should include many of the elements described in the parental consent form and the text of the form should be at an appropriate reading level to ensure students understand their participation in the research project.

- IRB approved and stamped copy of the staff/adult consent form
  - Active informed consent forms must also be signed by any CPS staff, parent, or student at least eighteen (18) years of age asked to participate in research.
  - If your study includes students who are ages eighteen (18) or older, they must be provided with informed consent forms. The informed consent forms for students ages eighteen (18) or over must include all of the elements described for a parental consent form (except for the PPRA language).

## **D. Types of Study Approval**

### **Overview**

The RRB's approval/acknowledgement of any external research study (review the definition [here](#)) should be considered 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. All external research is limited approval and requires the approval of the principal and of the study participants. Participation in research activities is voluntary.

### **Notice of Approval or Acknowledgement**

If a research proposal is approved, the RRB will issue a research approval letter to the Researcher. The RRB's approval of a research proposal is limited to the study scope and methods outlined in the proposal or Board contract. The 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 (1) month of beginning data collection. Please note that RRB approval to conduct research alone does not permit research personnel to enter a CPS school or building; Researchers must be approved through our volunteering and background check process before interacting with students. Further, principals have final authority over activities allowed to take place with their school's staff, students or communities.

### **Resubmission Request**

Research proposals may be approved by the RRB with the condition that the researcher modifies their proposal where requested by the RRB to be in accordance with CPS and Board policy. When these modifications are complete, the researcher may resubmit their proposal for additional review before a final decision of acceptance of approval is released. Research cannot begin until final approval is given. Resubmission materials must be submitted within IRBManager.

### **Limited or Conditional 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. All external research is limited approval and requires the approval of the principal and of the study participants.

### **Modifications**

If the 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. 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. The modification process is online within the IRBManager guidance document. All modifications must be submitted via IRBManager. Modification applications are reviewed on a rolling basis.

### **Rejected Proposals**

Proposals that are rejected by the RRB are deemed as having serious issues that 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 re-submitting a proposal, s/he cannot do so for two (2) review cycles.

## **E. 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.
- Research protocols utilizing virtual or remote methods must adhere to our [Acceptable Use Policy](#).
- Educational technology utilized within research must be approved by the district prior to consideration by the RRB. More information on approved vendors can be found [here](#).
- Classroom or other observations may not be audio/video recorded unless all parents of the students within the classroom have consented to the recording(s).
- Prior informed notice must be provided within a reasonable timeline to parents of students involved in a classroom or other observation.
- It is important to note that no CPS staff time or resources (i.e., CPS email or mail run) may 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 reasonable incentives 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.
    - For more information, please review "[E. Compensation for Research Participation](#)" under the "[V. Essential Guidance](#)" section.
  - Research conducted by a CPS employee must occur outside of normal work requirements including for the completion of a master's thesis or dissertation, and data collection cannot occur in any school in which the employee has authority.
    - 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 or parents of their current or former students.
    - For more information, please review "[C. CPS Employees/Research by CPS Employees](#)" under the "[V. Essential Guidance](#)" section.

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 (review the definition [here](#)) may be withdrawn for any reason at any time.

## IV. Requesting Secondary Data

### A. Process

Unlike research proposals, requests for secondary data is processed by the research manager and data team on a rolling basis. The timeline to process each request varies based on the nature of the data requested. All requests for secondary data must be submitted to the External Research Office using the [Data Request Form in IRBManager](#). There should be a clear link between the research question and the data requested. Consent forms must also be explicit about the data that will be requested, as seen in "[A. Consent](#)" and "[B. Consent Form Checklist](#)" under the "[V. Essential Guidance](#)" section. This means that specific time-bound data elements to be requested (e.g. grades, SAT scores

for School Year 2021-2022) should be explicitly listed within the consent form. In general, administrative data should only be requested for the current school-year. Research projects involving multiple years of administrative data should be re-consented for every year that the researcher hopes to request data.

## B. Request Form

The data request form requires researchers to provide the following information. Please ensure that you have thought about the following categories of information before completing a data request form:

- If your research is connected to an RRB approved research proposal or an executed data-sharing agreement, you must upload proof of approval and/or the agreement/contract.
- Project description
  - Analysis to be completed, methodology, intended audience, dissemination of results and end date. (Maximum 300 words).
- Sample population
  - Grades, school names/ID's, years, cohorting, etc.
- Data requested for analysis
  - See Appendix I for a list of types of data available for request. You will be asked to be as specific as possible about the type of data you are looking for. For example, if you want student assessment data, you must specify which assessment, and what academic years and grade levels you want that assessment data for.
- If requesting student level data (review the definition [here](#) ) the following is required:
  - Copy of IRB approved consent forms.
  - List of students for whom parental consent has been attained
    - A member of the External Research Team will reach out with a secure file transfer method. Please **do not share** identifying student information via email. ).
- Requested file format
  - SAS datasheet, Excel Spreadsheet

## C. Request Fulfillment

Upon submitting a completed data request, you will be contacted by a member of the data team to discuss the details of your request. CPS reserves the right to deny your request. If it is fulfilled, upon completion, data will be sent securely through the CPS secure file sharing site. Please expect data delivery no sooner than six (6) weeks after being contacted by the CPS data team about your request.

## D. Restrictions

In accordance with [Board policy](#), the researchers may not request data directly from schools or departments. All data requests must be submitted to the Central Office for handling. Researchers may not receive personally identifiable student level data (review the definition [here](#)) unless the researcher also provides the central office with: (1) written evidence that the parent or student, as appropriate, has consented to the release of student records; *or* (2) an applicable legal agreement between CPS and the researcher.

## V. Essential Guidance

### A. Consent

In studies involving student participants, Board Policy requires that active parental consent be obtained for students who are under eighteen (18) years old. *Studies with passive consent designs will not be approved.* Many common errors occur in consent forms. Consent forms must *specifically* support active consent (per [CPS Board Policy](#), even if you are granted exemption by an IRB). Consent forms should include yes/no checkboxes for all subjects to indicate their consent.

If your proposal includes any multimedia research data collection (such as audio or video recordings) you must also include consent for these activities as separate yes/no checkboxes (e.g., separate sections for participation in the research and/or for audio or videotaping). Additionally, many researchers fail to include the protection of Pupil Rights Act language as written; this should not be modified in any way.

For your benefit, it is as follows:

- “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 (TOLL) FREE-or-LOCAL NUMBER to obtain a copy of the questions or materials.”

Consent and study description may *not* be printed on any CPS letterhead. Research documents cannot imply that research activities are being conducted by CPS or suggest CPS support or sponsorship.

It must be clear to parents and guardians that these research activities are not related to their student’s school activities nor are they obligated to participate in your research in order to participate in any activities (e.g., if conducting a program evaluation, it must be clear that students may still participate in the program if they opt out of participating in

the evaluation activities).

In order to ensure fully informed consent as needed for the recruited population, consent forms must also be provided in appropriate languages should the primary language of parents or students be something other than English.

## **B. Consent Form Checklist**

Please ensure consent forms contain the following elements:

- Title of the study and identification of the researcher(s) conducting the study (e.g., professor at Loyola University)
- Brief, clear 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, participate in a focus group interview with other students)
- Amount of time required of participants for various research activities
- Commitment 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/XXX) or toll-free telephone number of researcher(s), so that the parent or participant may call if there are questions or concerns (note: email is not sufficient; a local or toll-free number must be included)
- PPRA statement, verbatim, as previously indicated (required for studies where students are asked specific questions or in cases where data is collected using research instruments such as surveys, interview questions, pre/post assessments, etc.)
- Space and lines for the student's name and parent/guardian signature. There must be a check-box for both consent and refusal to participate. The parent signature must refer to this such as "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 Services regulations and CPS Board of Education policy.* Passive consent, which is failure to object after receiving notice, is not sufficient. Even if your IRB determines passive consent is feasible, passive consent is not allowable under CPS board policy
- (If applicable) Description of any individually-identifiable student data to which the researcher seeks access (specifically indicated e.g., state assessment test scores in Math, attendance records, gender or other demographic variables, etc.). Information must also be included on who will access the data, how data confidentiality will be maintained and how/when data will be destroyed. There must also be separate yes/no checkboxes for the release of student level data (review the definition here).
- (If applicable) If student participants are ages (eighteen) 18 or over, the researcher must provide active consent forms for their participation (e.g.

- parental consent is not appropriate as the students are of legal age)
- (If applicable) Consent checkboxes if the researcher is seeking to audio or videotape participants with an explanation of how the recordings will be used and what happens to the tapes after the research is completed.

### **Service Provider or Community Based Organization Consent for Secondary Data**

Although every program is unique in the support they provide and the outcomes they intend to affect, there are some universal suggestions and requirements for consent to release administrative data:

- Allow a separate area for parental consent for the release of administrative data. Participation in the program must not be contingent on agreement to release student records.
  - For example, consent to participate in the program including program specific activities like field trips or events would have one (1) signature line for consent. A separate statement explains the request for administrative data release and provides parents the opportunity to consent. It must be clear that students' participation is neither contingent nor predicated on the parent's decision to allow release of administrative data.
- Provide clear, targeted descriptions of the data you are requesting to access. The data must be relevant and related to your intervention and/or program.
  - For example, if the program is a literacy intervention, a partner might request final course grades in reading/language arts and state test scores for reading/language arts.
- Use the same size font for parental consent for release of administrative data as you do for other text in your form. Avoid having the consent in a significantly smaller type size so that it is legible to parents.

### **C. CPS Employees/Research by CPS Employees**

If you are a CPS employee and are considering conducting research strictly within your area of responsibility, role or as a work assignment, it is likely that you do not need to apply for RRB review. A determination of whether one's research activities fall within the scope of existing roles is made on a case-by-case basis; contact our office at [research@cps.edu](mailto:research@cps.edu) for clarification and speak with your supervisor.

If you answer YES to either of the following questions, then it is likely that your research requires submission to and approval from the RRB before you may proceed:

- Is the research planned for purposes *beyond* those outlined in your job duties or current role (for example, for personal reasons such as the completion of a master's degree, dissertation, conference presentation, or other professional activities not directly part of your current job)?
- For the proposed research, would you require access to information or data that you would not typically access as part of your current responsibilities or duties or which is unrelated to your current role (for example, access to

nonpublic performance data from a different school)?

If you are an employee, also note that *any research activities must take place outside of contract/work hours and may not include research conducted on subjects known to the researcher* (such as teachers, students or staff at your school or at a school you directly support). Research sites and subjects must be independent of your existing role and places where you are not in a position of authority. Studies in which there is a possible conflict of interest will not be approved. For example, principals cannot collect data from staff members in their schools. Similarly, teachers cannot collect data from current, former, or future students.

#### **D. Graduate Student Research**

Graduate student proposals will only be considered for CPS employees. Please clearly indicate that you are a CPS staff member within IRBManager when applying to conduct graduate student research.

Please note that additional considerations are pertinent for CPS employees hoping to conduct research within the district; you need to be sure to separate your graduate student work from your role as a CPS employee. Any access that you have to CPS students, information, and staff in your role as a CPS employee cannot be used for coursework, class projects, papers, dissertations, or any other type of school research without obtaining consent from research subjects and approval from the RRB.

#### **E. Compensation for Research Participation**

It is acceptable for proposals to include compensation for individuals 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 incentive payment of up to \$50.00. Rarely, exceptions may be made for payments in excess of \$50.00 if the research requires extensive additional professional development outside school contract hours as part of the study. These situations must be fully and explicitly detailed in order to be approvable. If the research takes place in schools, any compensation exceeding the \$50.00 limit must be given to the school.

It is acceptable to include in your research proposal incentives for CPS students or families to return consent forms (provided the incentive is given whether participation consent is given or not) and for completion of research activities such as surveys and interviews.

If researchers are considering the use of gift cards or food items as participation incentives for students or families, consider the following recommendations and requirements:

- Any foods or beverages offered before, during, or after school must follow the CPS Healthy Snack and Beverage Policy as seen [here](#). In light of this policy we strongly recommend that research proposals consider the use of non-food incentives or rewards such as school supplies, books, gift cards, or other items. These may take a variety of forms and should be age appropriate for the population being studied.
- Researchers may consider providing choices to students and families for gift card incentives to ensure that the provided incentive is useful and in alignment with the student or family needs.
- Prepaid gift cards that can be used at any store accepting credit or debit cards (such as prepaid Visa cards or MasterCards) are appropriate. Researchers should review fee policies for such cards and ensure that they select cards with no fees or penalties and where the value of the card does not expire.
- Gift cards to stores should focus on stores in the local area of the student's school or home neighborhood which the student or family may frequent and where many items, including groceries, are available for purchase (such as food stores, drug stores, large retail stores, etc.).
- Gift cards to stores where the average cost of items exceeds the amount provided as an incentive are strongly discouraged and may ultimately not be approved (i.e., a \$5 incentive to a store in which the average item costs \$15 is not approvable). Furthermore, incentives such as music, game or app download gift cards which necessitate access to a specific device, computer or game system are discouraged.
- Gift cards to restaurants should also be offered in consideration of CPS' commitment to health and wellbeing for students and families. We strongly discourage offering gift cards for fast food options which may not promote healthy food choices.

## **F. Data Use**

It is the district's responsibility to protect student information. Although there is no right to access CPS data for research purposes, data may be shared for approved purposes and when requirements are met. Data cannot be used for purposes beyond the approved project and data requests are only approved in the interest of research or in the interest of improving service delivery. Therefore, the use of data for other purposes such as marketing, recruitment, or advertising is not allowed and would be in conflict with the CPS' policies. CPS retains ultimate control over the data once it is shared, meaning that data remains protected by relevant student privacy laws: student level data (review the definition [here](#)) cannot be shared with third parties and must be secured and protected. It is our expectation that any analytic reporting or data analysis will be done in a methodologically and scientifically sound way. Data must be destroyed following completion of research. Concern over the methods to be used to analyze and report data is grounds for CPS to reject a data request.

Before final approval is granted to access to either primary or secondary CPS data,

researchers will be required to sign and upload a Data Security Agreement into IRBManager. By signing this document, the researcher agrees to comply with all applicable statutes, policies, and rules pertaining to school records to be released. To access a copy of the Data Security Agreement, please click [here](#).

## G. IRB Approval

If the research includes an intervention or interaction with a living person (e.g., 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 submit approval from an 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 review must include an exemption letter from the IRB. ***This requirement is non-negotiable.*** When submitting your RRB application, you will be asked to provide contact information for the project's associated IRB.

An IRB is generally associated with colleges or universities, although there are privately run IRBs which may provide reviews for fees. 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.*

There have been a few isolated cases where IRBs have indicated that *they* require district approval prior to their review. In these rare cases, we suggest you share these guidelines or have your IRB contact our office.

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 complies with 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 reasons outlined in "[D. Types of Study Approval](#)" and "[E. Restrictions](#)" under the "[III. Conducting Primary Research](#)" section.

### IRB Documents Checklist:

- IRB approval letter or exemption letter
- IRB approval on consent and assent forms
- IRB approval on all surveys/other forms

## H. Payment to CPS

All applications to conduct primary research or requests for secondary data are subject to a \$50 processing fee. This fee must be received before review of the application can

commence. Credit card payments are accepted via our Epay system linked within IRBManager. Additionally, the fulfillment of any approved request for secondary data is subject to billing at \$100 per hour. CPS assumes no financial contribution to the project by the district.

## **I. Rationale for Fulfillment Costs**

Upon receipt of the formal data request, a staff member may 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 (2) hours to as many as eighty (80) 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 filing the request. Generally, requests can be filled in four (4) to six (6) weeks depending on the current workload of CPS staff.

## **J. Use of CPS Resources**

CPS resources may not be used for the completion of any research activities. Similarly, CPS staff may not be used to assist researchers in recruitment or selection of research participants. Teachers may engage in minimal supportive activities as appropriate, such as distributing and collecting consent forms provided that these activities present minimal disruption to instruction.

## **K. Background Checks**

Depending on the research activities, the board may deem that a background check is necessary to conduct the research activities. Primary research activities involving students will always require a background check. If deemed necessary, the RRB will require the researcher undergo the background check process before commencing their research. Please note background checks completed for other organizations do not suffice (e.g., even if the researcher has received a background check through his or her employer or university a CPS criminal background check must still be performed).

Background checks are processed through our volunteers approval system, [civicore](#). This process first requires you to fill out an application using the volunteer system, and these directions are intended for new volunteers. An application should be submitted for every member of your research team who could potentially enter a CPS facility.

- Access the application via the following link: [chicagopublicschools.civicore.com](http://chicagopublicschools.civicore.com)
- Select “New Volunteer” and begin the application.
- When selecting School(s)/Organization(s) to Volunteer, choose the option “Researchers.”
- All researchers should select “Level I” as their volunteer type.
- Be sure to select “Researcher” as the type of volunteer. This field can be found

under the section for Additional Information. Once “Researcher” is selected you will be able to input your relevant RRB number. The RRB number should not be omitted.

- Researchers do not need to provide any information under the references section found at the bottom of the application.

Submitting an application using the instructions outlined above will begin the formal process for completing a background check through CPS. Following the submission of your application, CPS will contact you by email, and you will be asked to provide fingerprints and proof of a tuberculous test. Tuberculous test results are valid for one year prior up to the date of your application. The instructions for submitting both of these items will be provided in the email.

## Appendix A: Available Data

The following types of data are available for request through the secondary data request form. While this table does not encompass all data that external researchers may be interested in requesting, it does represent the most typical types of data requests. As such, this data is more readily available and we will be more likely able to fulfill your request if your data is listed here. You will also be required to submit a blank copy of your consent form. CPS reserves the right to request copies of signed consent forms for all students you request data for. Active parental consent is required for student level data (review the definition [here](#)). Please be advised that even with active consent, there is no right to access student data. The CPS External Research Office reserves the right to deny a data request in part or full. The more specific your consent form is, the more likely we will be able to fulfill your request.

Type of Data	Variables
Student Demographics	<ul style="list-style-type: none"> <li>● Gender</li> <li>● Age</li> <li>● Race/Ethnicity</li> <li>● Free/Reduced Price Lunch Status</li> <li>● Students Experiencing Homelessness Indicator</li> <li>● English Language Learner Status/ESL Status</li> <li>● Special Education Status</li> <li>● Diverse Learner Status/IEP</li> <li>● 504 Plan</li> <li>● Other (Please Describe)</li> </ul>

<p>Student Enrollment/Attendance Status</p>	<ul style="list-style-type: none"> <li>● Enrollment days (by school)</li> <li>● Enrollment history</li> <li>● Annualized school (EOY)</li> <li>● Attendance days (by school)</li> <li>● Annualized attendance rate (by school)</li> <li>● Total Annual Days Present/Absent/Tardy</li> <li>● Annual Attendance Rates</li> <li>● Student Promotion/Graduation Status</li> </ul>
<p>Misconduct &amp; Discipline</p>	<ul style="list-style-type: none"> <li>● ISS</li> <li>● OSS</li> <li>● Student Code of Conduct Violations</li> </ul>
<p>Graduation &amp; Enrollment Status</p>	<ul style="list-style-type: none"> <li>● School (point in time)</li> <li>● Graduation status</li> <li>● Active/inactive status</li> </ul>
<p>Grades &amp; Performance</p>	<ul style="list-style-type: none"> <li>● Elementary School <ul style="list-style-type: none"> <li>○ Quarter/Semester/Final grades (class) <ul style="list-style-type: none"> <li>■ Math</li> <li>■ ELA</li> <li>■ Science</li> <li>■ Social Science</li> <li>■ Other (Text Box Answer)</li> </ul> </li> <li>○ 3-8 On Track</li> </ul> </li> <li>● High School <ul style="list-style-type: none"> <li>○ GPA (Semester Level)</li> <li>○ GPA (Annualized)</li> <li>○ Semester grades (Course IDs required)</li> <li>○ Freshman on Track (FOT)</li> </ul> </li> <li>● Student Schedules</li> <li>● Student Transcripts (Credits)</li> </ul>
<p>Student Assessment</p>	<p><b>Please Note: For a detailed list of student assessments and administration calendars within CPS, please visit <a href="http://www.cps.edu/academics/student-assessments">www.cps.edu/academics/student-assessments</a>.</b></p> <ul style="list-style-type: none"> <li>● Illinois Assessment of Readiness (IAR, Previously PARCC)</li> <li>● NWEA (RIT Scores, Percentile, MAP Growth)</li> <li>● PSAT</li> <li>● SAT</li> <li>● ACT</li> <li>● Illinois Science Assessment (ISA)</li> <li>● TRC/DIBELS Next</li> <li>● mCLASS Reading 3D</li> <li>● mCLASS Math</li> </ul>

	<ul style="list-style-type: none"> <li>● mCLASSm DIBELS/IDEL (Spanish version)</li> <li>● Algebra Exit Exam</li> <li>● Dynamic Learning Maps-Alternate Assessment (DLM-AA)</li> <li>● ACCESS (for ELLs)</li> <li>● Teaching Strategies Gold (TS-Gold)</li> <li>● REACH Performance Tasks</li> </ul>
Postsecondary Data	<ul style="list-style-type: none"> <li>● Naviance Student Transition Survey</li> <li>● Naviance College Application File</li> <li>● National Student Clearinghouse</li> <li>● FAFSA Application/Status Data</li> <li>● Other <b><i>(Please Describe)</i></b></li> </ul>
Student Survey Data	<ul style="list-style-type: none"> <li>● Senior Exit Questionnaire (SEQ)</li> <li>● 5Essentials (My Voice My School) Survey Data - Measure Level <ul style="list-style-type: none"> <li>○ <b>DISCLAIMER: Item Level and Staff Level Responses are unavailable for external use.</b></li> </ul> </li> </ul>
Early College and Career Credentials (ECCC)	<ul style="list-style-type: none"> <li>● AP Courses</li> <li>● IB Program data</li> <li>● Dual Credit/Dual Enrollment</li> <li>● Career and Technical Education (CTE)</li> <li>● JROTC</li> </ul>
Other Data Elements	<ul style="list-style-type: none"> <li>● Summer Programming Data</li> <li>● Student Health Data</li> <li>● Staff/Talent Data</li> <li>● Other data as requested. Determination on fulfillment will be made depending on feasibility of the External Research Office.</li> </ul>

Explain what data is requested. Be specific and ensure the data you are seeking is not listed in any other category.