Guidelines for Conducting Research with Chicago Public Schools
A Visualization of the Board of Education's External Research Policy

The Chicago Board of Education has **policies, standards and guidelines** in place establishing **requirements for requesting authorization to conduct research** in the Chicago Public Schools (CPS) **and/or to receive CPS data for research purposes.*** The External Research Office in the Department of School Quality, Measurement and Research evaluates requests to **comply with these regulations.**

To read the **External Research Policy and Research Review Board (RRB)** Guidelines in full, as well as find additional resources, user guides, and links to online forms, please visit us online at **www.cps.edu/about/district-data/conduct-primary-research.**

You can reach us directly via email at **research@cps.edu**.

External Research Regulatory Environment

Just as you could not walk into a hospital and ask for the medical records of its patients, researchers and those engaged in learning do not have a right to **access school communities** and **individual level school records**. Below is a brief overview of the **Federal, State and local Board of Education policies governing when, where and how data can be collected** from school communities.

The district provides a significant amount of aggregated data at the school and district level online at **www.cps.edu/about/district-data.** For requests related to obtaining records through FOIA**, please visit **www.cps.edu/about/freedom-of-information-act-foia**.

Family Educational Rights and Privacy Act (FERPA)

Protection of Pupil Rights Amendment (PPRA)

Illinois School Student Records Act (ISSRA)

Student Online Personal Protection Act (SOPPA)

Chicago Board of Education External Research Policy

Research Review Board Guidelines and Policies

*External Research Study and Data Policy (Section 203.4 | Board Report 19-1211-PO3)
**Freedom of Information Act (FOIA): The law provides that a person can ask a public body for a copy of its records on a specific subject. Some records may be subject to confidentiality provisions imposed by other state or federal laws. The FOIA process for disclosure of information does not supersede these other applicable statutory and judicial mandates.

How Do We Define "Research"?

Chicago Public Schools has several processes in place to help external researchers conduct research and collect data. The CPS External Research Office **groups requests for research into two broad categories:**

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

Secondary Research
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 or personally identifiable

How to Submit Materials for Review

The Research Review Board (RRB) is the External Research Office's process used to assess proposals to conduct **primary research** in CPS. Proposals are reviewed 5 times per year, approximately 6 weeks before the start of each quarter, including the summer session. You can view the current RRB calendar here.

Beginning in 2022, the External Research Office began accepting proposals for primary and secondary research using our online portal, called IRBManager. We can also now accept payments online via the Illinois E-Pay site, found within the RRB and External Data Request forms in IRBManager. **All requests to conduct research or access secondary data should be submitted via IRBManager.**

If your request is approved, it is **valid for one year from the date of approval.** If activities **extend beyond this date, your project will need to be reauthorized** in the system, called a Continuing Review; or if you make changes to your project (recruitment pool, research instruments, etc), your approval will be renewed through this Modification.

Am I Required to Obtain RRB Approval?

While not all projects may meet the Board's definition of External Research and require RRB review and approval, you should reference the matrix below to determine which definition your project falls under. Below, you will also find an FAQ on further determining if your project meets the Board's definition of research.

RRB

NO

Case By Case Basis

YES

YES

Internal Research

- Involves **board employees** who plan to conduct research on how to improve Board services and programs as part of **their general job duties**. Internal researcher must obtain the prior approval of their supervisor prior to commencement of research activities, but should **not require RRB Review**. This explicitly **excludes research towards a master's thesis or dissertation**

Charter and Contract Schools

- Charter school communities are **not under the jurisdiction 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

External Research

- Includes (1) research **conducted by individuals, organizations, or agencies independent of 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 (3) product research **conducted by company or entity** to study a product's effectiveness. **All External Research must submit a full proposal to the CPS RRB**
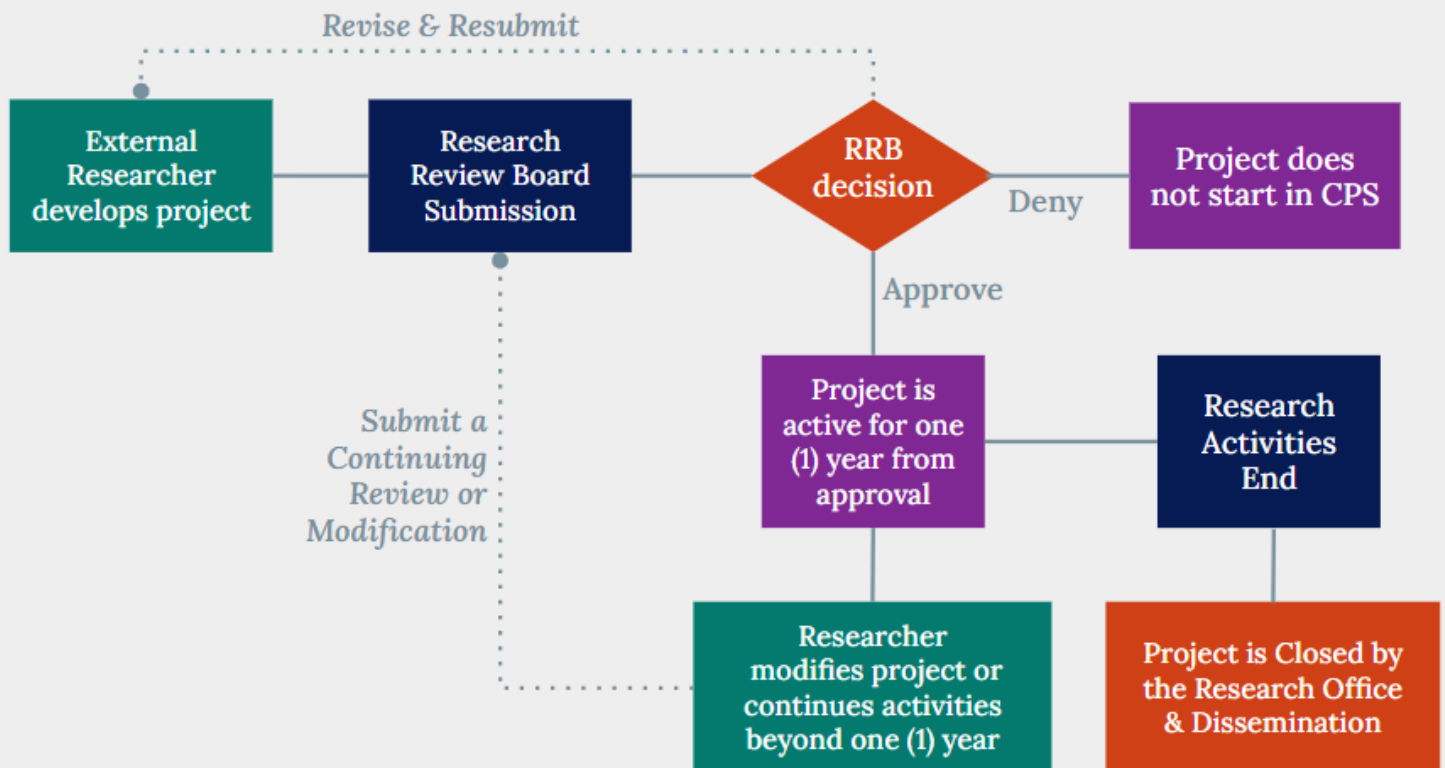
Board Contracted Research

- **Conducted by board contractors** in accordance with their **contract** with the Board or a **memorandum of understanding (MOU)** with a CPS department or school. **All board contracted researchers must submit a full proposal to the CPS RRB.**

When Should I Submit Materials to the RRB?

Institutional IRB Review

Obtain Institutional IRB review through a university system, hospital system, or independent IRB, and **approval/exemption prior** to submitting to the CPS RRB.

1

2

3

Research Approved

Once Institutional IRB and CPS RRB reviews have been completed and all approvals /acknowledgements are in place, the research is **fully approved from a regulatory standpoint.**

CPS Research Review Board

Following Institutional IRB review, submit to the CPS RRB. **No project is exempt from RRB Review**, and must submit even if an IRB deemed their project exempt.

RRB Flow Chart

Revise & Resubmit

External Researcher develops project

Research Review Board Submission

RRB decision

Deny → Project does not start in CPS

Approve

Submit a Continuing Review or Modification

Project is active for one (1) year from approval

Research Activities End

Researcher modifies project or continues activities beyond one (1) year

Project is Closed by the Research Office & Dissemination

Chicago Public Schools

RRB Restrictions to Note

The following are important CPS and RRB policies to consider in your research activities, including selecting participating schools; determining recruitment and data collection procedures; and providing compensation for participation:

Research protocols utilizing **virtual or remote methods with students** must adhere to the **Acceptable Use Policy,** which stipulates that any direct contact with students needs to occur in a **CPS hosted Google Meets room**. Zoom or other video conferencing methods cannot be used with students or participants under the age of 18. To see the a full description of permitted online interactions, visit **www.cps.edu/about/policies/acceptable-use-policy**.

Classroom or other observations may not be **audio/video recorded** unless there is **universal consent among all the guardians** of the students within the classroom. Prior informed notice must be provided within a reasonable timeline to parents of students involved in a classroom or other observation. **Video recordings that only capture staff instruction are typically still required to obtain unanimous consent** given the likelihood of incidentally capturing students. **Field notes may be taken in lieu of video or audio recordings.**

Educational technology utilized within research must be **in compliance with the Illinois Student Online Personal Protection Act** (105 ILCS 85.) It should be noted that the Board employs a broad definition of "education technology" to include **any technology a student enters information into, including survey platforms such as Qualtrics or Survey Monkey.** You can view which tools are currently in compliance with SOPPA at **www.cps.app.learnplatform.com/new/public/tools**.

It is acceptable for proposals to include reasonable incentives for CPS students who participate in research projects; **There is no maximum amount for incentives for students and families. CPS staff participating** in research activities outside contract hours **may receive a total reward of up to $50 per calendar year.** If incentives exceed $50, CPS staff participants will be required to submit a secondary employment form to the Ethics office. Any compensation exceeding this amount may also be given to the school for distribution.

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 personnel to engage data collection for your project.** This includes CPS staff conducting external research for educational purposes.

Using CPS Data in Secondary Research

If your study and/or evaluation will require **secondary administrative data** on individuals (CPS staff or student level data) a formal data request must be submitted through IRBManager. School and District level data can be found publicly on our school data page and the City of Chicago's Data Portal.

Below are some important notes to consider when submitting your request for Secondary Research:

All requests for secondary, administrative data (not primary data collection) must be made to the External Research Office using IRBManager. **External Researchers cannot collect secondary data directly from the school** (e.g. asking school clerks or principals for copies of report cards.)

Requests for **student level data without active parental consent or a contract** with the Board **will be denied**. Requests for **de-identified student and/or staff level data** will be considered, but please note that these requests are **typically denied absent an agreement with the Board.** To protect our students, CPS chooses to employ a strict definition of what is considered identifiable, as outlined in FERPA.

Unlike primary research proposals, requests for secondary data are processed by the External Research Office on a **rolling basis**. The timeline to process each request varies based on the nature of the data requested. If it is fulfilled, data will be sent securely through CPS' secure file sharing site. **Expect data delivery no sooner than six (6) weeks after being contacted by the CPS data team about the request.**

Due to internal processing and public reporting of metrics, administrative data is available beginning in the most recent school year, **not the current school year** (i.e. you can request data from School Year 2021-2022 in the winter of School Year 2022-2023). If you require administrative data prior to January 1 of the following school year, please note this in your application and the External Research Office will evaluate the feasibility your request.

Research projects involving (a) multiple years of administrative data and (b) rely on student consent need to have a consent form on file for every year that the researcher requires access to data. **CPS does not consider consent granted in perpetuity as valid.** Consent forms must also list the **specific, time-bound data elements** to be requested (e.g. final grades, attendance and standardized test scores for School Year 2021-2022.)

FAQ: Evaluation & Research

In some instances, CPS vendors providing services to CPS students or staff wish to evaluate their services. The question of evaluation versus research is **only applicable to CPS vendors** who are providing direct services to students or staff. Below, you will find more information on whether or not a CPS vendor should submit their evaluation to the Research Review Board.

Q1: Are you a CPS vendor providing services directly to CPS students or staff?

Yes - Go to Q2

No - If you want to provide services but you are not an approved vendor or you do not have an agreement or MOU with CPS, you will need to first complete those processes. If you want to provide services for the purpose of evaluating those services, you are required to submit your materials to the RRB.

Q2: Do you want to collect survey responses ONLY from recipients of your services?

Yes, surveys only - go to Q3

No, I want to collect surveys and/or other types of data (focus groups, interviews, etc) - go to Q3

No, I do not need to collect any data, I just need administrative data - this process is not applicable to you

Q3: What is the purpose of data collection?

Program evaluation, continuous improvement, user experience - go to Q4

Program impact, "Did it work?", effectiveness - this is research, and needs to be reviewed by the RRB; this type of data collection is typically NOT covered in vendor agreements or MOUs

Q4: Does your vendor agreement or MOU clearly articulate the data collection you are seeking to perform, including the types of data (surveys, focus groups, interviews, etc)?

Yes - you may collect data for program improvement purposes per your agreement or MOU. Data collection instruments should be attached as exhibits in your agreement; if they are not, please provide them to the External Research Office and to your CPS business partner for review and approval prior to administration.

No, it only includes surveys - go to Q5

No, it includes neither surveys nor other data collection - go to Q5

Q5: You will need to amend your vendor agreement or MOU. Is your CPS business partner willing to facilitate such an amendment?

Yes - proceed with amending your agreement; upon amendment, you may collect data for program improvement purposes per your agreement or MOU. Data collection instruments should be attached as exhibits in your agreement; if they are not, please provide them to the External Research Office and to your CPS business partner for review and approval prior to administration

No - you will not be able to collect the information you are seeking absent support from your CPS business partner and an agreement specifying data collection

FAQ: Conducting Research

How often does the Research Review Board meet to consider proposals?

The CPS RRB meets quarterly to review external research proposals, typically 6 weeks before the start of each quarter, including the summer session.

Can I approach school communities about a research proposal prior to getting RRB approval?

Yes, but keep in mind that RRB approval is necessary to begin any official **recruitment of research subjects.** You may approach schools to gauge interest and capacity, as well as collect any necessary Letters of Support, but should keep in mind that **school principals and administrators have ultimate authority regarding any study activity in their school.** RRB approval should be considered a "permission slip" to approach schools and research subjects for **recruitment**, but does not give an external researcher the right to enter a school and conduct the proposed research activities.

Do I always have to gather written consent from guardians? Is a notice to opt out of research activities an option?

In studies involving primary data collection, the Board's External Research Policy requires **active informed consent in almost all circumstances** for research or evaluation participants. Active written or verbal assent for minors is strongly encouraged by the Board.

What if I am a graduate student who wishes to partner with CPS to fulfill requirements of my education?

Currently, the **CPS RRB only considers graduate proposals from CPS staff** members looking to conduct research to complete a Master's Thesis or Doctoral Dissertation. Please be aware that the Board's External Research Policy states that you **must use independent research subjects** in your studies (i.e. you must not have a position of authority over proposed research subjects or have a conflict of interest with proposed research subjects). This means you <u>cannot conduct research on any current or future students</u>, or **staff over whom you have authority.** If you are a school-based staff member, this **likely means that you will need to conduct your research outside of your current school building.**

Where do I go to submit documents for a re-submission or re-authorization of an existing RRB project?

Re-Submission of a Project (RRB Determination of Revise & Resubmit)
After a decision has been made by the RRB, you will be notified via email from IRBManager. In some cases, your proposal will be neither approved nor denied, and the RRB will request more information or specific modifications. These should be submitted within IRBManager, keeping in mind that this is still a **new submission** and *not a modification* to an approved project.

Modifications and Continuing Review
Modifications and Continuing Review applications are **reviewed on a rolling basis**; these are not adherent to the dates found on the Research Review Board Calendar. A $50 processing fee is still required for consideration. All modifications and continuing reviews must be submitted through IRBManager. You should not submit a new form for Modifications and Continuing Reviews, but rather amend the form currently in your dashboard. **You can expect your submissions to be reviewed and processed within 15-20 business days.**

More information about submitting forms in IRBManager can be found in our User Guide in www.cps.my.irbmanager.com.