

Guidelines for External Research and Data Collection in Chicago Public Schools

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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 CPS, procedures for submitting a research proposal for review, as well as 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 comprised of members from various Chicago Public Schools (CPS) offices.

There is no right to access Chicago Public School's 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, researchers 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. [Click here to review the CPS Board Research Study and Data Policy.](#)

C. Primary Research

The RRB process is used to review primary research studies. These are 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. Page 7 explains the process for submitting primary research requests. 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 on page 14.

Approval of a research study is valid for one (1) calendar year (including multi-year studies); at the end of one year from the date of approval, research activities must cease unless researchers request and are granted an extension by submitting a request. RRB 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 10 and *any*

identifying information is removed) OR personally identifiable (where the data are minimally aggregated at 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 at www.cps.edu/schooldata. 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 on page 12. 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 on page 15. 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 (see list below), it is not required to fill out an application to conduct primary research (i.e. RRB application) since there are no direct research activities occurring.

Data available for request:

- 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 Appendix A for a more detailed list of data available for request.

When filling out the [External 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 that has been explicitly named in the consent form. Please review Section IV: Requesting Secondary Data 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 (link below). Research subjects who are covered by the research policies and review process include: students (both minors and students who are 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:

CPS Research Study and Data Policy

<https://policy.cps.edu/download.aspx?ID=178>

CPS Parents and Student Rights of Access to and Confidentiality of Student Records (706.3)

<http://policy.cps.edu/download.aspx?ID=122>

Family Educational Rights and Privacy Act (FERPA)

<http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

The Protection of Pupil Rights Amendment (PPRA)

<http://familypolicy.ed.gov/ppra>

The Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule

<https://privacyruleandresearch.nih.gov/>

F. Research Review Board

The Research Review Board (RRB) reviews research proposed on behalf of the Board of Education. 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 approximately every six (6) weeks 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 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 the formal data request form available online.

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 Contract school staff: Although 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 to the CPS RRB if they wish to conduct research.

Board Contracted Research is 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 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 is group level data (school, district, statewide, etc.) containing average statistics on the group where the subgroup(s) is/are greater than 10. All aggregate level data is de-identified and active parental consent is not required.

Student Level Data is identifiable information on any subgroup of students and/or data on subgroups that contain fewer than ten (10) students. CPS adheres to, and uses, the definition of personally identifiable information provided by the Family Educational Rights and Privacy Act (FERPA). FERPA defines personally identifiable information to include the name and address of the student and the student's family; a personal identifier, such as the student's Social Security Number, student ID number, or biometric record; other indirect information, such as the student's date and place of birth and mother's maiden name; 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; and information based on a targeted request. Requests for identifiable student level data requires active parental consent.

III. Conducting Primary Research

A. Process

The Research Review Board is comprised of members representing various Central Office Departments. The RRB meets approximately every six weeks to evaluate all new requests to conduct research. RRB modifications and re-submissions for existing projects are reviewed on a rolling basis (i.e. not on the same six week schedule for new submissions). The RRB calendar containing the deadlines for new submissions can be found on the [CPS Research Website](#). Decisions resulting from the research review process will be emailed to the applicant of the request, as well as appropriate CPS staff, between 2 to 8 weeks after the review meeting. It is in the researcher's best interest to submit RRB proposals only after securing approval from the respective department at CPS. For example, if a proposal contains a strong early education focus, it would be advisable to first secure partnership and approval from the early education department at CPS, and provide proof of that partnership in the RRB application. 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, and federal / state laws and regulations, proposed research must also:

1. Demonstrate educational value, either to Chicago Public Schools directly or as a contribution to the field of education.
2. Address an identified research priority of the District and not duplicate research already occurring in the District.
3. Document that the researcher or organization has the capacity and experience to successfully complete the project.
4. **Protect the privacy of students, families and staff members and ensure compliance with state and federal laws and well as CPS board policy.** The Federal Educational Rights and Privacy Act (FERPA) and the Illinois School Student Records Act are based on the premise that information about an individual student is private and confidential and generally may only be accessed with parental consent.
5. 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.

Please Note: In addition to the criteria above it is strongly encouraged that Research Proposals are submitted only after a CPS stakeholder or department has been identified. Finding an appropriate stakeholder after the formal RRB review process increases the likelihood of an extended response time, and decreases the likelihood of project approval.

C. Application Materials

All requests to conduct research within Chicago Public Schools must be submitted via **email** and in **paper** by the posted submission date in order to be reviewed at the scheduled meeting. Four identical paper copies of the application must be submitted; a digital copy of all proposal materials must also be emailed to research@cps.edu. A \$50 processing fee should be delivered with the four paper copies, payment must be check or money order and addressed to Chicago Public Schools. Paper copies and processing fee can be mailed or dropped off at the front desk of our Loop Office at 42 W. Madison.

Mail paper copies and processing fee to:
Chicago Public Schools
Office of Planning and Data Management | Attn: RRB
42 W. Madison St
Garden Level
Chicago, IL 60602

The following information is required on the application:

- 1) Executive Summary or Abstract:
Synopsis of the proposed research including research purpose, individuals (i.e., students, teacher, etc.) included in research and length of time data collection is to take place (200 words maximum).
- 2) Researcher Status and Title:
Statement naming primary investigator, title and status (i.e., student, professor, director, etc.) within institution or organization. Any CPS employees must disclose CPS employment status and position in this section.
- 3) 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.
- 4) Purpose of the Research and Literature Review/Justification of Research:
Brief (500 words maximum) summary of literature supporting the proposed research must be provided.
- 5) Description of the Direct Benefit to the Chicago Board of Education 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). If the project has already been discussed with CPS departments or stakeholders, it should be noted in this section.
- 6) 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. Additionally, a detailed plan for data security, storage, and destruction should be discussed in this section. 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. Lastly, a description of all consenting processes must be clearly described in this section (i.e. student assent,

- parental consent, staff consent, etc.).
- 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. We strongly encourage submission of requests at least sixty (60) days in advance of proposed research commencement.
 - 8) **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 see page 20 for more information about IRB approval.
 - 9) **Copy of all study instruments:**
This includes, but is not limited to, protocols for any planned survey, interview, observation, or focus group. This also includes any assessments administered to students. Any instrument planned for digital administration (i.e. online surveys) is not exempt from this review; the content of digital instruments must be provided to the RRB via a web link, or it can be transposed onto a Word or PDF document.
 - 10) **IRB approved and stamped copy of the informed parental 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.
 - 11) **IRB approved and stamped copy of the student assent form(s):**
Students who are between the ages of 12 (6th grade) and 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.
 - 12) **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 18 years of age asked to participate in research. 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 for a parental consent form (except for the PPRA language).

D. Types of Study Approval

The RRB's approval/acknowledgement of any external research study 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.

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 can be submitted via email to research@cps.edu and are reviewed on a rolling basis.

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. All external research is limited approval and requires the approval of the principal and of the study participants.

Modifications

If a Researcher wishes to modify the research scope, methods or materially change the research activities (including instruments or consent forms), the Researcher must obtain prior written approval of the modification from the RRB. If applicable, the RRB may request an updated IRB approval letter for the submitted modifications. 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 application can be found online and can be submitted via email, traditional mail, or both. Modification applications are reviewed on a rolling basis.

Rejected Proposals

Proposals that are rejected by the Research Review Board are deemed by the Board 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 until two full review cycles elapse.

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. Requests for extensions are submitted via the same modification application described above. [The RRB modification application can be found online](#) and can be

submitted by either email or traditional mail. Modifications are reviewed on a rolling basis. Please note, the RRB's approval of a board contracted research project will be valid for the duration of the contract.

Final Report

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 RRB, 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.

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.

1. 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.
2. 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.
3. CPS cannot be used to recruit participants for research. School staff may not be utilized to collect data.
4. 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 (see page 18 for more information). 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. See page 18 for more information on compensation.
5. Research conducted by a CPS employee (see page 17 for more information):
 - a. 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.
 - b. 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.

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.

IV. Requesting Secondary Data

A. Process

Unlike research proposals, requests for secondary data are processed by the Research Manager and Data Team on a rolling basis. Requests for secondary data are sometimes part of an approved research project (i.e. RRB). Even if your project was approved through the RRB, you will still need to submit an additional request for the relevant secondary data, and those data should be noted in the original RRB application. Generally, our office responds requests within 30 days. If approved, request fulfillment takes an additional 30 days. However, the timeline to process each request can vary based on the nature of the request. All requests for secondary data must be submitted using the electronic External Data Request Form. There should be a clear link between the research question(s) and the data requested. Consent forms must also be explicit about the data that will be requested (see page 14).

B. Request Form

The electronic External Data Request Form requires researchers to provide the information listed below. Please note, as of March 2019, the request form is hosted by Google and must be completed and submitted electronically. Accompanying attachments, such as RRB approval letters or consent forms, should ALWAYS be submitted to research@cps.edu. Additionally, payment for submissions is required to be mailed to the CPS Central Office. See the "Essential Guidance" section of this document for more information on payment submission.

Special Note: This form is reserved for use by CPS partners working in collaboration with the district. That can include program providers evaluating program implementation, or RRB approved researchers. This form IS NOT to be used by students, undergraduate, graduate or otherwise (excluding RRB approved graduate student researchers). If you submit this as a student, solely for the purposes of your education the request will be denied.

Please ensure that you have thought about the following categories of information before completing the External Data Request Form:

1. *RRB and other agreements:*

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. Additionally, there is a place on the application where you will input the applicable RRB number.

2. *Project description:*

Analysis to be completed, intended audience, dissemination of results and end date. Also, be

sure to clearly explain how the requested data will allow you to reach your projects goals.

3. *Sample population:*

In order to process your request for student level identifiable data, we will require the submission of your consented sample for the extract. Ideally this will include CPS student ID, or enough information (i.e. Full name, date of birth, school attended for year in question, etc.) to allow us to match to student in our records. You will also need to provide a description of the sample (grades, school, years, etc.).

4. *Data requested for analysis:*

See Appendix A at the bottom of this document for a list 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, the specific fields from said assessment, and the applicable academic years and/or grade levels. Please review the [public data page](#) and other [CPS web resources](#) if you are unsure about the elements that constitute a typical data file.

5. *If requesting student-level data (see definition on page 6) the following is required:*

- A copy of the IRB approved consent forms. Submit at the time of the request.
- A list of students for whom parental consent has been attained. Submit ONLY after request receives approval.

Consent Form: **DO NOT** submit consent forms that have been filled in by participants. Please submit a blank copy/template of the form that was used. Consent forms should be emailed to research@cps.edu at the time of the request, and the study title must be included in the subject line of the email.

Student Sample List: Student lists should not be submitted until your request receives approval. Student lists are preferred in a password protected Excel spreadsheet, with the password submitted in a separate email. Student lists should always be submitted via email to research@cps.edu and the study title must be included in the subject line of the email.

6. *CPS Stakeholders:*

If applicable, this section should include a brief history of your project within CPS, including a description of the CPS stakeholders (either individuals or departments) that have knowledge of your project.

7. *Connection to the CPS Mission and Initiatives:*

Provide details which highlight how this project is connected to the CPS Research Agenda, the CPS Mission and Vision, or other specific goals of the District.

8. *Requested file format:*

SAS datasheet OR 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. **CPS cannot provide the data through your organizations SFTP.** Please expect data delivery no sooner than six (6) weeks after being contacted by the CPS data team about your request.

D. Restrictions

1. In accordance with Board policy, Researchers may not request data directly from schools or departments. All data requests must be submitted to Central Office for handling (i.e., the process outlined here).
2. Researchers may not receive personally identifiable student-level data unless the Researcher also provides the central office with written evidence that the parent or student, as appropriate, has consented to the release of student records. Student-level data is defined on page 6.

V. Essential Guidance

A. Consent

In studies involving student participants, Board Policy requires that active parental consent be obtained for students who are under 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 Institutional Review Board). Consent forms should include yes/no checkboxes for all subjects to indicate their consent.

If your proposal includes any multimedia research data collection (i.e. 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 in conjunction with CPS or suggest

CPS support or approval.

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

___ 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.)

___ (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.

___ (If applicable) Description of any collected student class work or artifacts (i.e. art projects, journal entries, program specific assessment sheets, etc.). Information must also be included on how artifacts will be acquired, what they will be used for, and how/when those artifacts will be returned or destroyed. There must also be separate yes/no checkboxes, on the parental consent form, for the release of work or artifacts.

___ 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) If student participants are ages 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 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 supports 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 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.

- o 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 significantly smaller type size so that it is legible for 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 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 before you may proceed:

1. 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)?
2. 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 Screening Process:

If you are a graduate (Masters, Doctoral, etc.) student, you must complete the Graduate Student Research Screening Form prior to, and in addition to, applying (i.e. RRB application) to conduct research in CPS. This form can be found on our website (www.cps.edu/research) and must be submitted to research@cps.edu. In your submission, please do not provide any additional attachments beyond the application. If your Graduate Student Research Screening Form is not approved, you may not apply to the RRB, nor conduct the proposed research within CPS. Alternatively, if your Graduate Student Research Screening Form is approved, you may then subsequently submit a full RRB application. Our office typically responds to these applications

within 30 days or less. **Approval of your Graduate Student Research Screening Form does not guarantee that your research will be approved by the Research Review Board.**

Important tips and details regarding the Graduate Student Screening Process:

- Complete the application fully and ensure enough detail is provided. Conversely, avoid providing every detail surrounding the project. Do not provide examples of your instruments, consent forms, or any other supplemental documentation beyond the Screening Form itself. Graduate Student Screening Forms are reviewed by one individual (i.e. not the full Research Review Board), and as such, it is not appropriate for that one person to review and reach a decision on the full scope of your project.
- Applications are reviewed to ensure the project is thoughtfully constructed, beneficial to the district, and could potentially contribute to the greater world of education. If these basic requirements are not met, or if there are other noted issues, the application will not be approved.
- You will receive a formal response to your submission via email, in the form of a decision letter.
- Ensure the project has been properly reviewed and approved by your institution. If approved, the RRB will request your IRB approval in the full application.
- Be intentional in your decision to engage with CPS for your research. If the benefit to CPS cannot be clearly articulated, it may be best to reach out to alternative districts.
- Be aware of the types of projects already occurring within CPS to avoid submissions which duplicate work. One source for such information is the University of Chicago Consortium on School Research, and other analogous institutions with a long history of collaboration with CPS.
- It is strongly encouraged to make a submission at least 3 months prior to the date in which you hope to begin activities. Please keep in mind that if your application is approved, a new application must be submitted and reviewed by the RRB, which meets every 6 weeks. Please visit cps.edu/research for a copy of the most recent RRB calendar.

Graduate Student Research by CPS Employees:

If you are a CPS employee and you are conducting research for a graduate degree or a course, 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. Action research projects, in which the primary investigator is evaluating their own performance within their school or authority, are sometimes partially exempt, depending on the full scope of the project.

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. Rarely, exceptions may be made for payments in excess of \$50 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 approved, our department will reach out with the appropriate action steps. If the research takes place in schools, any compensation exceeding the \$50 limit must be given to the school.

It is acceptable to include in your research proposal incentives for CPS students or families who return consent forms (provided the incentive is given simply for return, regardless of affirmative consent), 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: <https://policy.cps.edu/download.aspx?ID=120>. 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.
- Pre-paid gift cards that can be used at any store accepting credit or debit cards (such as pre-paid Visa cards or MasterCard) 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.

F. Data Use

It is the district's responsibility to protect student information. Although there is no right to access, 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 District's policies.*** The District retains ultimate control over the data once it is shared, meaning that data remains protected by relevant student privacy laws: student level

data 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 the completion of the research. Concern over the methods to be used to analyze and report data are grounds for CPS to reject a data request.

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 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 review must include an exemption letter from the IRB. **This requirement is non-negotiable.**

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.

IRB Documents Checklist:

- IRB approval letter or exemption letter
- IRB approval on consent and assent forms
- IRB approval on all surveys, and all other instruments or 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. Acceptable forms of payment include check, or money order. All checks must be made out to Chicago Public Schools. **Cash, credit card, or online payments are not accepted.** CPS assumes no financial contribution to the project by the district. Acceptable forms of payment should be mailed to the following address:

Chicago Public Schools
Office of Planning and Data Management
42 W. Madison Street 2nd Floor
Chicago, IL 60602

I. 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.

J. Background Checks

Depending on the research activities, the board may deem that a background check is necessary to conduct the research activities. Generally, a background check is required for any instance where a researcher is conducting activities with students, staff, or within a CPS facility. If deemed necessary based on the research activities, the RRB will provide the researcher with information on the background check process. 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).

K. Online RRB PDF Application

If you are having trouble filling out the editable online RRB PDF application (for the initial RRB submission, or subsequent modifications), application materials may be completed in an alternative document (such as a Microsoft Word file) and attached to the PDF with the phrase “see attached” in each section of the PDF. The attached file must follow a similar format to the PDF and answer all questions clearly and completely. Be sure you have tried the print to file option if you still have trouble.

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. Also, there is no right to access student data. Active parental consent is required for student level data. The more specific your consent form is, the more likely we will be able to fulfill your request.

Type of Data	Common Requests
Assessment	<ul style="list-style-type: none"> ● NWEA (MPG, MAP): Score, Percentile, Test date ● PARCC: Score, Percentile, Test date ● TRC/DIBELS: BOY results, MOY results, EOY results ● SAT/ PSAT: Subj score, Test date ● ACT/EPAS: Subj score, Test date ● mCLASS: BOY results, MOY results, EOY results
Attendance	<ul style="list-style-type: none"> ● Enrollment days (by school) ● Annualized school (EOY) ● Attendance days (by school) ● Annualized attendance rate (by school) ● Enrollment history
Misconduct & Discipline	<ul style="list-style-type: none"> ● Misconduct level (1-6) ● Suspensions (OSS, ISS) ● Expulsion ● Detention ● Restorative Conversations
Demographic	<ul style="list-style-type: none"> ● Gender ● Race/ethnicity ● FRL (Y/N) ● ELL (Y/N) ● IEP Status (Y/N) ● DOB ● Address
Graduation & Enrollment Status	<ul style="list-style-type: none"> ● School (point in time) ● Graduation status ● Active/inactive status

Grades & Performance	<ul style="list-style-type: none">● Elementary School<ul style="list-style-type: none">○ Semester grades (class)○ Final grades (class)● High School<ul style="list-style-type: none">○ Semester GPA○ Semester grades (Course IDs required)○ Cumulative unweighted GPA○ Freshman on Track (FOT)
Other	Explain what data are requested. Be specific and ensure the data you are seeking is not listed in any other category.