

I. Policy Statement

The Board of Education believes that responsible research is necessary to evaluate and improve educational programs and practices, and expects that the system will conduct such studies from time to time. The Board also recognizes that individuals and agencies may approach the Board for permission to conduct research in the school system.

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

II. Purpose

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

III. Definitions

Within the context of this policy and the implementation procedures, the following definitions apply:

- A. Action Research – School- and classroom-based studies that teachers, principals, pre-service candidates/interns, and/or other school system staff initiate and conduct as they systematically reflect on their own teaching or other work and collect data that will answer research questions.
- B. Anonymity – Assurance that research subjects not be identified by name, a subject’s identity is protected, and an individual is unknown.
- C. Confidentiality – Assurance that a researcher holds in confidence or keeps secret from the public any information collected during research that may include Personally Identifiable Information (PII).
- D. Data Collection – The process of gathering and measuring information in a systematic fashion that enables one to answer stated research questions, test hypotheses, or evaluate outcomes. Methods of data collection include, but are not limited to:
 - 1. Questionnaires or Surveys: multiple choice or open-ended questions.

2. Interview and Focus Groups: formal and informal discussions.
 3. Observations: formal and anecdotal perceptions.
 4. Document Analysis: extant materials related to the research.
- E. External Researcher – An individual or agency that seeks to engage in research that is not conducted by HCPSS employees, as part of their job responsibilities, or students, as part of their classroom assignments.

External researchers include, but are not limited to:

1. For profit and not-for-profit organizations, national study groups, local/state/federal agencies.
 2. Individuals who are HCPSS employees seeking to conduct research for coursework, master's theses, or doctoral dissertations.
 3. Individuals who are non-HCPSS employees seeking to conduct research for doctoral dissertations.
 4. HCPSS students seeking to conduct research that is not part of their regular classroom assignments and/or that will be disseminated beyond HCPSS.
- F. Informed Consent – Process that takes place between a researcher and a potential participant that includes full disclosure of the nature of the research and the participant's involvement, assurance of adequate comprehension on the part of the potential participant, and written documentation of the participant's voluntary choice to participate.
- G. Institutional Review Board (IRB) – A committee within an academic institution that reviews proposed research involving human subjects to ensure the research meets federal guidelines for ethical conduct.
- H. Internal Researcher – An individual employee or unit within HCPSS seeking to conduct research as part of the employee's or group of employees' job responsibilities.
- I. Minimal Risk – The probability and magnitude of harm or discomfort anticipated in the research are not greater than those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations or tests.
- J. Parent – Any one of the following, recognized as the adult(s) legally responsible for the student:
1. Biological Parent – A natural parent whose parental rights have not been terminated.

2. Adoptive Parent – A person who has legally adopted the student and whose parental rights have not been terminated.
 3. Custodian – A person or an agency appointed by the court as the legal custodian of the student and granted parental rights and responsibilities.
 4. Guardian – A person who has been placed by the court in charge of the affairs of the student and granted parental rights and responsibilities.
 5. Caregiver – An adult resident of Howard County who exercises care, custody, or control over the student but who is neither the biological parent nor legal guardian, as long as the person satisfies the requirements of the Education Article, §7-101(c) (Informal Kinship Care).
 6. Foster Parent – An adult approved to care for a child who has been placed in the home by a state agency or a licensed child placement agency as provided by the Family Law Article, §5-507.
- K. Personally Identifiable Information (PII) – Any information that, alone or in combination, would make it possible to identify an individual with reasonable certainty.
- L. Research – A structured and systematic investigation that uses observational, experimental, and/or data collection methods to provide reliable, valid, replicable, and generalizable findings.

IV. Standards

A. High Quality Research

High quality research proposals will articulate a clear purpose and methodological rigor and will be considered for approval based on their relevance to current school system goals and priorities.

B. Approval of Research

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

1. Responses to HCPSS requests for proposal (RFP) for external research may be recommended for approval by the Superintendent/Designee after screening and evaluation, and must be presented to the Board for approval.
2. Research that may be presented to the Superintendent/Designee for approval, after screening and evaluation includes:
 - a. Unsolicited research proposals from external researchers.

- b. Action Research that is conducted by a school principal.
 - c. Data collection that is conducted systemwide and is not part of a research proposal.
 3. Research that may be approved by the school principal/designee includes:
 - a. Action Research that is conducted by teachers and staff within the school.
 - b. Research conducted by an HCPSS student that is part of regular classroom assignments and is conducted within the school.
 - c. Data collection that is conducted within the school and is not part of a research proposal.
 4. Research that will not be approved or supported includes:
 - a. Research proposals designed to meet requirements for receiving credit in undergraduate or graduate courses, seminars, practicum or training workshops, except for those deemed Action Research.
 - b. Research proposals from non-HCPSS employees for master's theses.
 - c. Research proposals for studies that are determined by HCPSS to involve greater than minimal risk.
 - d. Research proposals that are not of a high quality.
 5. Research that is not subject to the approval process above includes:
 - a. HCPSS school-based and central office administrators and other staff (including task-forces, advisories, and work groups) gathering, having access to, and/or using data that are inherently required to fulfill the responsibilities and functions of their roles.
 - b. Action Research, conducted as part of a staff member's job responsibilities, with no intent to publish.
 6. Authorization to conduct research is granted upon approval of proposed research.
- C. Conducting Research
 1. All researchers with approved proposals will adhere to the following ethical standards:
 - a. Ensure that their research does not create greater than minimal risk.

- b. Honor all guarantees of anonymity and confidentiality.
- c. Protect the confidentiality of all PII.
- d. Recognize that participation in research is voluntary, and will obtain informed consent as appropriate.
- e. Collect data for the sole purposes of the approved research activity.
- f. Obtain approval before making any modifications to the approved research proposal.
- g. Destroy, as necessary, all collected data within the timeframe agreed upon during the approval process.

2. Special Requirements for Research Involving Students

- a. Research involving all students, regardless of age and/or IRB requirements, requires the informed consent from a parent and the assent of the student. (Assent means a child's affirmative agreement to participate in research.)
- b. HCPSS reserves the right to require written informed consent, even if the IRB waived the requirement.
- c. HCPSS requires that all researchers must obtain written informed consent from a parent (or an adult or emancipated minor student) before obtaining information from students in any of the sensitive topics listed below. In compliance with the Protection of Pupil Rights Amendment to the Family Educational Rights and Privacy Act (FERPA), sensitive topics include:
 - i. Political affiliations or beliefs of the student or student's parent.
 - ii. Mental or psychological problems of the student or student's family.
 - iii. Sexual behavior or attitudes.
 - iv. Illegal, anti-social, self-incriminating, or demeaning behavior.
 - v. Critical appraisals of others with whom respondents have close family relationships.
 - vi. Legally recognized privileged relationships, such as with lawyers, doctors, or ministers.
 - vii. Religious practices, affiliations, or beliefs of the student or parents.

viii. Income, other than as required by law to determine program eligibility.

3. Authorization to conduct research may be revoked if the researcher violates any of the ethical standards or procedures outlined in this policy, or does not conduct the research in accordance with the researcher's approved proposal.

D. Reporting Research

1. Researchers will maintain the anonymity, confidentiality, and protection of PII of individual students, schools, and school system staff in reporting the results.
2. Researchers will not release PII in a way that permits linking specific individuals to specific responses or information.
3. Researchers will not reveal the identity of schools, offices, divisions, or the county unless authorized by the Superintendent/Designee.

E. Data Privacy and Protection

Researchers will adhere to all federal, state, and HCPSS guidelines for ensuring that PII remains confidential and anonymous throughout both the conducting and the reporting of approved research.

F. Training

1. School-based and central office administrators will be trained regarding the implementation of this policy to support their role in approving action research projects and ensuring that staff members comply with procedures for conducting research in the school system.
2. Appropriate personnel will be trained to ensure that staff members comply with procedures for conducting research in the school system.

V. Responsibilities

A. The Superintendent/Designee will:

1. Screen and evaluate research proposals in accordance with this policy.
2. Handle all communication with those proposing to conduct research.
3. Submit research proposals recommended under §IV.B.1 to the Board for approval.
4. Monitor the implementation of research projects to ensure adherence to guidelines and timeframes.

5. Maintain a record of all research proposals that includes the proposals' status.
 6. Maintain a record of all completed research materials and reports.
- B. Principals/Designees will:
1. Evaluate action research and student research proposals.
 2. Inform the Superintendent/Designee of proposals that have been approved.
 3. Monitor implementation of approved proposals.
 4. Submit to the Superintendent/Designee a copy of completed research findings.
- C. Training will be conducted by the Division of Accountability.

VI. Delegation of Authority

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

VII. References

- A. Legal
National School Lunch Act, Public Law 79-396, Section 9 amended
Family Educational Rights and Privacy Act (FERPA),
20 U.S.C. §1232g; 34 C.F.R. Part 99
Protection of Pupil Rights Amendment (PPRA), 20 U.S.C. §1232h; 34 C.F.R. Part 98
COMAR 13A.08.02, Student Records
The Annotated Code of Maryland, State Government Article, Section 10-616 and
Section 10-617
- B. Other Board Policies
Policy 4000 Grants
Policy 7010 Personnel Records
Policy 8120 Testing: State and Local Responsibilities and Protocols
Policy 9050 Student Records
- C. Relevant Data Sources
- D. Other
Application to Conduct Research in the HCPSS
Department of Health and Human Services

VIII. History

ADOPTED: September 26, 1974

REVIEWED:

MODIFIED:

REVISED: July 8, 1982
October 25, 1990
September 7, 2006
February 12, 2015

EFFECTIVE: July 1, 2015

RESEARCH INVOLVING EMPLOYEES
AND STUDENTS

Effective: July 1, 2015

I. Research Priorities

Research proposals will be classified based on the following:

- A. Highest priority will be assigned to studies which relate directly to current school system goals, priorities, and initiatives.
- B. Second priority will be assigned to studies which promise direct benefit to the instructional program.
- C. Third priority will be assigned to studies that show promise for the extension of knowledge in a substantive field or fields related to, or having implications for, education.

II. Communication of Policy

- A. The policy will be published publicly in multiple formats to ensure that all potential researchers have the information necessary to submit a research project proposal.
- B. School-based and central office administrators will share this policy with those who approach them regarding research projects.

III. Approval Process, Timeline, and Reporting of External Research

For external research proposals governed by Policy 3030, sections IV.B.1 & IV.B.2.a, the following provisions apply:

- A. Research proposals submitted for approval under these provisions will be sent to the Division of Accountability and will include the following:
 - 1. The completed Application to Conduct Research in the Howard County Public School System (HCPSS).
 - 2. A detailed research proposal that includes a clear research statement, rationale, and detailed justification of how the research supports current HCPSS goals, priorities, and initiatives.

3. A justification for the proposed research methodology.
 4. A thorough description of the proposed methods for data collection, data analysis, reporting findings, maintaining the confidentiality and/or anonymity of participants, and safeguarding the data collected.
 5. Copies of all research materials (e.g., questionnaires, tests, interviews, surveys, protocols, other research instruments, and informed consent forms) that will be used.
 6. An estimate of the number of HCPSS schools, teachers, students, and other school system staff that are to be involved.
 7. A list of outside personnel who are to be involved and their qualifications and assignment.
 8. A detailed estimate of the time required of students, teachers, and other school system staff involved, including the time that students will miss classroom instruction in order to participate.
 9. A timeline that includes: the timeframes for conducting the research, collecting and analyzing data; the estimated date for submitting the final report, the executive summary, and an interim report if applicable; and the date upon which collected data will be destroyed.
 10. Institutional Review Board Approval Letter.
 11. For principal researchers, resumes with references.
- B. All researchers who will be conducting research at any HCPSS location are required to complete a Criminal Background Investigation and obtain clearance from HCPSS before beginning their research.
- C. All proposals to be considered during any given school year will be received at least twelve (12) calendar weeks prior to the desired starting time.
- D. Research proposals that have all completed documentation will be reviewed within one calendar month.
- E. The research proposal will initially be reviewed by the Superintendent/Designee. In addition, the appropriate curricular and/or program departments will provide input in order to determine the benefit and suitability of the research. If proposals involve specific schools, the principals and appropriate staff of those schools will also provide input.
- F. Using the input and recommendations from the reviewers, the Superintendent/Designee will approve or deny the research proposal based on the

standards and procedures outlined in this policy. A letter will be sent to the researcher to notify him/her of the decision. In the case of a denial, the letter will include the rationale behind the decision.

- G. All approved research will be completed within the approved timeline. If research is not completed within the allotted time period, the researcher will apply for an extension and obtain approval from the Superintendent/Designee in order to extend the research process. If the research involves specific schools, the principals and appropriate staff of those schools will be asked for input regarding the researcher's request for an extension.
- H. All approved research will be conducted as approved in the original proposal. If modifications to the approved research proposal are needed, researchers will apply for a modification and obtain approval from the Superintendent/Designee. If the research involves specific schools, the principals and appropriate staff of those schools will be asked for input regarding the researcher's request for modification.
- I. Within thirty (30) calendar days of completing data collection, the researcher will send a letter indicating the completion of data collection to the Superintendent/Designee.
- J. Within the timeframe estimated in the approved research proposal, the researcher will submit an interim report if applicable, a final report, and an executive summary to the Division of Accountability.
- K. Within thirty (30) calendar days of receiving all required documents as specified in III.J. above, a letter of completion will be sent to the researcher from the Division of Accountability.
- L. For proposals requiring approval from the Board.
 - 1. Any research proposal that has been accepted and recommended for approval will be scheduled for consideration at the next available Board meeting.
 - 2. Once approved or denied, a final notice will be sent to the research applicant. In the case of a denial, the letter will include the rationale for the decision.
- M. If an applicant's research proposal is denied, the applicant may appeal once, in writing, to the Division of Accountability. Appeals must be received within thirty (30) calendar days of the date upon which the denial letter was written.

IV. Approval Process, Timeline, and Reporting of Action Research

For action research proposals governed by Policy 3030, sections IV.B.2.b & IV.B.3, the following provisions apply:

- A. The HCPSS employee's immediate supervisor will act as the Superintendent's designee: for school principals, the immediate supervisor will be the administrative director; for teachers and school staff, the immediate supervisor will be the school-based principal/designee.
- B. Research proposals submitted for approval under this provision will be sent to the appropriate immediate supervisor and will include the following:
 - 1. A high quality research proposal that includes a clear research statement, rationale, and justification of how this research supports current HCPSS goals, priorities, and initiatives.
 - 2. A justification for using the proposed research methodology.
 - 3. A thorough description of the proposed methods for data collection, data analysis, reporting findings, maintaining the confidentiality/anonymity of participants, and safeguarding the data collected.
 - 4. Copies of all research materials (e.g., questionnaires, tests, interviews, surveys, protocols, other research instruments, and informed consent forms) that will be used.
 - 5. An estimate of the number of HCPSS schools, teachers, students, and other school system staff that are to be involved.
 - 6. An estimate of the time required of students, teachers, and other school system staff involved, including the time that students will miss classroom instruction in order to participate.
 - 7. An estimate of the timeline for collecting data, analyzing data, and reporting findings that includes an estimated date for submitting the final report.
- C. All approved research will be completed within the approved timeline. For research that is not completed within the allotted time period, the researcher will obtain approval from the immediate supervisor to extend the research process.
- D. All approved research will be conducted as approved in the original proposal. In order to make modifications to the approved research proposal, the researcher will obtain approval from the immediate supervisor.
- E. Once the data collection is completed, the researcher will notify the immediate supervisor in writing.
- F. Within the timeframe estimated in the approved research proposal, the researcher will submit a final report to the immediate supervisor. All forms of reporting will adhere to federal, state, and HCPSS guidelines for ensuring that PII remains confidential and anonymous.

- G. If an applicant's action research proposal is denied, the applicant may revise and resubmit the proposal to their immediate supervisor, or may appeal the decision within thirty (30) calendar days.

V. History

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