

# Milton Town School District

## Policy

### F 104: RESEARCH PROJECTS, SURVEYS AND STUDIES

The Milton Town School District (MTSD) recognizes the potential value of research which includes Milton students, families and staff. The Superintendent of Schools will develop procedures to govern the application, administration and approval of all research projects, studies, or surveys within the District. Only those studies which have value to MTSD as assessed by the Superintendent will be approved.

#### I. Rights and Definitions

##### Parent Rights

The parent of a student shall have, upon request, the right to inspect a survey created by a third party before the survey is administered or distributed within a school to a student.

##### Student Rights

The rights provided to parents under the Pupil Rights Amendment and this policy transfer to the student when the student turns 18 years old, or is an emancipated minor under applicable Vermont law.

##### Definitions

As used in this policy, the following terms shall mean:

*"Invasive physical examination"* means a medical examination that involves the exposure of private body parts or any act during such examination that includes incision, insertion, or injection into the body, but does not include a hearing, vision or scoliosis screening.

*"Personally identifiable information"* means any information directly related to a student, including the student's name, birth date, address, social security number, individual purchasing behavior or preferences, parents' names, telephone number, or any other information or identification number that would provide information about a specific student.

*"Instructional material"* means instructional content that is provided to a student, regardless of format. It does not include tests or academic assessments.

*"Parent"* means a natural or adoptive parent, a legal guardian or other person standing in loco parentis (such as a grandparent or stepparent with whom the child lives, or a person who is legally responsible for the welfare of a child).

#### II. Criteria for Approval

A. Research studies and surveys may be approved when conducting studies for, or on behalf of, educational agencies or institutions to:

1. Develop, validate or administer predictive tests.
2. Administer student aid programs.
3. Improve instruction.
4. Improve the health and welfare of students and/or staff.
5. Improve the safety of students and staff.
6. Improve the quality of any other program or activity of Milton Town School District

7. Conduct research to add to the educational/psychological research base.
- B. The relevance, quality and merit of the project to Milton Town School District (MTSD) will be a factor in granting approval.
- C. The methodology proposed must be:
1. In the best interests of MTSD.
  2. Not unduly burdensome in terms of time and expense to Milton Town School District, its students, their families, and/or staff.
  3. Respectful of the privacy rights of students and/or staff.
  4. In compliance with all federal and state laws, including but not limited to: The Individuals with Disabilities Act, The Family Educational Rights and Privacy Act, 20 U.S.C. §1232g; and the federal law protecting pupil rights and placing limits on surveys, analysis, and evaluation of pupils set forth in 20 U.S.C. §1232h
  5. Consistent with generally accepted research procedures and protocols.

### **III. Research Requiring Approval**

- A. Prior approval is required for any research proposal that involves the collection of data from students, teachers and administrators through processes such as:
1. The examination and/or collection of information from files or records.
  2. Direct observations of students or staff.
  3. Focus groups
  4. Written or electronically administered surveys
  5. Individual interviews
- B. Prior approval is also required for Milton Town School District employees or student interns seeking to conduct a research study involving students or staff to fulfill the requirements for a dissertation, thesis or university course.
- C. Prior approval is also required for the release of students' names and addresses. In accordance with the Family Education Rights and Privacy Act, Milton Town School District shall not release, to a researcher, a list of student names and addresses unless parents are notified in advance in writing and given the opportunity to object to the release of their directory information. The notice to parents shall describe the extent to which, if any, the researcher intends to create and maintain personally identifiable information about students and, if so, the researcher's procedure for maintaining the confidentiality of those records and the procedure for destroying those records at the conclusion of the research study.

### **IV. Research Not Requiring Approval**

- A. Research studies by employees as part of their normal job responsibilities are exempt from the approval process set forth in this policy in Section VI below.
- B. Studies directed by the Superintendent, Principals, or Business Manager to evaluate the effectiveness of:

- 1) independent contractors employed by Milton Town School District; or
  - 2) programs conducted by or within Milton Town School District.
- C. Surveys of students by Milton Town School District students for a school assignment or a school sponsored publication are exempt from the approval process so long as student participation in the survey or research study is voluntary and anonymous and the survey is approved by the student's classroom teacher.
- D. Research exempted from the approval process is still subject to applicable federal and state laws pertaining to student and employee rights to privacy as well as procedural requirements for research projects set forth in Section VI.

## **V. Proposal Requirements**

Individuals or institutions seeking to conduct research in the MTSD must submit a written proposal in compliance with the procedures set forth in this policy and any additional regulations or procedures established by the Superintendent for the implementation of this policy. The researcher must provide with the application the following documentation.

- A. A one page summary stating:
1. The research title and/or the name of the project.
  2. The names of principal researcher(s) and their addresses, telephone number(s) facsimile number(s) and e-mail address(es), the names of the educational institution, if any, for which the research is being conducted.
  3. The dates the research project is to be conducted and completed.
  4. The research rationale, the proposed participants, the data collection process and the potential for providing information beneficial to Milton Town School District and the students it serves.
- B. A research proposal that presents the following information:
1. The purpose of the research study.
  2. A description of the study that identifies the participants in terms of their number, grade level(s), and any special characteristics of the participants and/or the schools to be involved. If students, teachers or other staff members are to be assessed or surveyed in any manner, the process and the length of the process must be described. Description of the sampling and participant selection process shall be included. A description of the interventions to be used, data collection analysis procedures, and methods to protect participants from risk of invasion of privacy must also be provided.
  3. Administrative time and burdens. The proposal must describe the amount of student, teacher and other staff time needed to conduct the study and the physical resources required to be provided by Milton Town School District, such as: distribution and collection of paper surveys, data processing, classrooms and access to special facilities. If students and teachers are involved, the impact on their instructional program must be detailed.
  4. Survey Instruments and other documents. Information about the instruments, observation schedules, letters to parents/participants and/or other documents to be

used in the research must be provided with the proposal. If the instrumentation to be used is commercially available or has been reviewed and referenced in material such as The Buros Mental Measurement Yearbook, the researcher need only describe the instrument to be used and indicate the reference information. If the instruments are peculiar to the research project or have not been referenced above, the researcher must provide copies of the actual instruments with the proposal. The researcher must present details of all instruments specifying the age/grade appropriateness, time required, and the reliability and validity of the instrument if that information is available.

5. Confidentiality. The study shall be conducted in a manner that does not permit personal identification of parents and students by individuals other than the researcher and/or his/her/its employees. In addition, any personally identifiable information must be destroyed when no longer needed for the purposes for which the study was conducted.
6. Funding and Costs. The applicant must specify the source of funding for the project and the costs, if any, to be incurred by MTSD to conduct the study. As a part of the approval process, MTSD may require the researcher to reimburse MTSD for all or part of its costs to conduct the study. The amount of reimbursement will be based upon the extent to which the information gained from the study benefits MTSD. In other words, if the research will provide little or no educational benefits to MTSD, MTSD may require the researcher to reimburse MTSD for all of its costs. On the other hand, if the research will provide data of significant educational value to MTSD, MTSD may not require any reimbursement of its costs.
7. Timelines that outline projected dates for implementation and reporting of preliminary and/or final results to MTSD and participants.
8. Researcher's Background Information. The principal researcher(s) must provide information that describes his/her/their qualifications and educational background such as a resume.
9. Consent Forms and Disclosure Statements
  - a) Students
    - (1) No student shall participate in a research project or submit to a survey, analysis, or evaluation that reveals information concerning the items listed below, without prior written consent from their parent or guardian.
      - (a) political affiliations or beliefs of the student or the student's parent
      - (b) mental and psychological problems of the student or the student's family;
      - (c) sex behavior and attitudes;
      - (d) illegal, anti-social, self incriminating and demeaning behavior;
      - (e) critical appraisals of other individuals with whom respondents have close family relationships;
      - (f) legally recognized privileged or analogous relationships, such as those of lawyers, physicians, and ministers;
      - (g) religious practices, affiliations, or beliefs of the student or student's parents; or

(h) income (other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program).

(2) Prior written and informed consent must be obtained from the parent or guardian of a student participating in research projects in which a student is required, as part of any applicable program, to submit a sample of any body fluid for analysis or testing or to an invasive physical examination.

(3) Prior written consent from the parent or guardian of a student participating in any research project may be required at the discretion of MTSD. If prior written consent is not required, the researcher shall at a minimum notify students and parents in advance of the purpose, scope and nature of the research study, give them an opportunity to examine the instruments used in the study and an opportunity to object to their student being involved in the research study. At the discretion of MTSD, the notice may be sent by US Mail or any other reasonable means. Parents shall be given a telephone number, e-mail address and/or written form to object to their child's participation in the study.

(4) No student shall be required to participate in any research study over the objection of the student's parent or legal guardian.

b) Employees. School personnel must give their consent prior to participation in any research conducted by an outside agency or individual. School personnel may be required to participate in research conducted by MTSD to assess the quality of programs or services provided by MTSD. All employees shall be given information about the purpose, nature and scope of any research study as well as their right to privacy applicable to the study. In order to provide informed consent the following information must be provided to employees:

(1) The purpose of the research.

(2) The procedure and criteria for selecting participants

(3) The procedure to be followed, including a description of the participant's involvement.

(4) Anticipated benefits of the study.

(5) Whether the participants will be personally identifiable, and to whom, and for how long personally identifiable data or information will be maintained.

(6) Who will have access to personally identifiable information.

(7) Who will have access to the results.

(8) The name and contact information for the person to whom questions should be addressed before, during and after the research study.

(9) The name of the Institution or agency sponsoring the research study. The participant's right to withdraw consent at any time.

(10) Prohibition on the disclosure of information about students.

(a) It is unlawful for a person who enters into a research contract with Milton Town School District to sell any personally identifiable information that is obtained from a student as a result of the person's performance under the contract. This prohibition does not apply if the person obtains the prior written authorization

of the student's parent or guardian. This authorization shall include the parent's or guardian's original signature. The person shall not solicit this authorization and signature through the school's personnel or equipment or on school grounds.

(b) The following definitions apply in this section.

(1) 'Contract' means a contract for the provision of goods or services.

(2) 'Personally identifiable information' means any information directly related to a student, including the student's name, birth date, address, social security number, individual purchasing behavior or preferences, parents' names, telephone number, or any other information or identification number that would provide information about a specific student.

(3) 'Sell' means sell or otherwise use for a business or marketing purpose.

## **VI. Approval Procedure**

- A. The Superintendent or his designee is authorized to approve requests to conduct research projects, studies and/or surveys of students and staff within the MTSD based on the criteria set forth above.
- B. The Superintendent or his designee may appoint a standing or ad hoc committee as necessary or appropriate to assist him in the review and approval of research proposals.
- C. Reasonable efforts should be made to review and approve (or disapprove) each complete research proposal within 30 days of its submittal.
- D. The Superintendent or his designee will consult with the principal of a school to determine whether or not the research project, study and/or survey will place undue burdens on the instructional or clerical time of the school's students and/or staff. The burden placed on schools staff and any interference with instructional process will be considered in a decision to approve or disapprove a research proposal.
- E. The Superintendent or his designee shall have the authority to place limitations, requirements and restrictions on any research study as a condition of approval which are consistent with the spirit and intent of this policy.
- F. The Superintendent or his designee shall have the authority to require the researcher to reimburse MTSD for its costs to conduct a research study that does not provide direct and substantial benefits to MTSD.

- G. Approval of a research study does not constitute an establishment of a joint venture or research project between MTSD and the researcher(s). Approval only provides permission to access the schools, students and school personnel.
- H. A decision to disapprove a research proposal may be appealed to the Board of Education in accordance with the Parent and Student Grievance Procedure.

**VII Publication of Results**

- A. The finding(s) of any study must be shared with the Superintendent or his designee.
- B. If publication of findings is planned, the researcher(s) must share the finding(s) with the Superintendent or his designee not less than 14 days before publication, granting public access or providing a copy to the news media.
- C. If MTSD will be identified in any way in the publication of the results, the researcher must obtain permission from the Superintendent or his designee for such identification.

*Date Warned:* 6/8/2009  
*Date Adopted:* 6/22/2009  
*Legal Reference(s):* *The Individuals with Disabilities Act,*  
*The Family Educational Rights and Privacy Act, 20 U.S.C. §1232g; 20*  
*U.S.C. §1232h*  
*Cross Reference:* F27