

SOP 1.3.3 **Research in Schools**

General Description:

This document describes the policy and procedures for research that involves subjects who are students in public/private schools, research that involves access to and use of educational records, and/or research that is conducted in educational settings. There is a separate SOP for College Students as Research Participants (see SOP 1.4.5). George Mason University (GMU) complies with the federal regulatory requirements for human subjects research that is funded by the U.S. Department of Education (ED) and/or is conducted in institutions that receive ED funding (for research or any other purposes).

The following are assumed to receive ED funding unless otherwise known: Public elementary and secondary schools, school districts, intermediate education agencies, state education agencies, early childhood educational institutions, postsecondary educational institutions, special education, job training, career and technical education, adult education, and any other public or private agency or institution that uses funds from ED.

Procedures:

Site Permission:

K-12 school sites are autonomous institutions that retain the right to approve/reject any human subjects research to be conducted on their site, in their facilities, or with their teachers, staff or students. Therefore, for research in schools, the IRB requires site permission (which is separate from the consent required from research participants) and/or local county IRB/Research Office approval from an appropriate authority at each school or district.

Many school districts have additional requirements for conducting research in their schools. Mason researchers must provide applications to and obtain permissions from the schools in addition to the GMU IRB prior to conducting research in schools. Each school district should be contacted for additional assistance. The researcher is responsible for locating and contacting the appropriate county/school office and obtaining all necessary permissions. School districts may require GMU IRB approval before they will review a study. If the county/school office requires modifications to an approved protocol, an amendment must be submitted to the GMU IRB so those modifications required by the county/school can be approved prior to implementing.

The researcher should describe his/her plan to obtain school approval in the appropriate section of the IRB application form. Although the Mason IRB does not require researchers to submit documentation of these types of permissions, the IRB does require an assurance that the relevant permissions will be sought prior to conducting the research.

If non-GMU teachers are engaged in conducting the research activities, beyond recruitment, please follow [SOP 1.3.6 for Collaborative Research](#).

PPRA: The Protection of Pupil Rights Amendment:

This federal law applies to all children not over age 21 who are in elementary and secondary programs and institutions that receive funding for any purpose (research or otherwise) from the U.S. Department of Education (ED). It is intended to protect the rights of students and their parents in educational settings.

The Following are the Regulatory Requirements of PPRA:

PPRA requires schools to notify parents and obtain prior written consent from the parents for certain activities including student surveys, analyses, or evaluations that involve one or more of the following eight areas:

1. Political affiliations or beliefs of the student or student's parent
2. Mental or psychological problems of the student or student's family
3. Sex behavior or attitudes
4. Illegal, anti-social, self-incriminating, or demeaning behavior
5. Critical appraisals of others with whom the students have close family relationships
6. Legally recognized privileged relationships, such as with lawyers, doctors, or ministers
7. Religious practices, affiliations, or beliefs of the student or parents
8. Income, other than as required by law to determine program eligibility

PPRA assigns full compliance responsibility to the researcher and the educational institutions. There is no role or responsibility for the IRB. For more information about PPRA requirements please see:

<http://familypolicy.ed.gov/content/ppra-requirements>

FERPA: The Family Educational Rights and Privacy Act:

If the research involves accessing individually identifiable information about students such as grades, test scores, course work or other student records, signed consent from the parents (or student if they are over age 18) is required based on the Family Educational Rights and Privacy Act (FERPA) regulations. For more information, please see [the FERPA regulations](#). The registrar's office at GMU can be contacted at FERPA@gmu.edu for more information regarding how to remain compliant with FERPA.

Researcher responsibilities: Researchers are responsible for complying with FERPA laws when accessing student education records for research purposes, including for the purpose of identifying and recruiting potential research participants or conducting a secondary analysis of the records. The primary requirement is to obtain written consent, authorizing the release of the education records for research purposes, unless the disclosure falls within one of the exceptions described in FERPA

IRB responsibilities: FERPA assigns full compliance responsibility to the researcher and the educational institutions. There is no role or responsibility for the IRB. However, it is GMU policy that, as a service to assist researchers in the fulfillment of any FERPA requirements, the IRB will:

1. Remind researchers about FERPA on IRB submissions.
2. Provide basic information and references about FERPA (i.e. this document).

Related Forms, Guidance, and SOPs:

- 45 CRF 46.111
- SOP 1.4.1 Research Involving Children
- SOP 1.3.6 Collaborative Research
- FERPA regulations: <http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>
- FERPA at Mason: http://registrar.gmu.edu/ferpa/?_ga=1.48301024.794477215.1461599160
- PPRA regulations: <http://familypolicy.ed.gov/ppra>
- Research in VA schools: <https://rdia.gmu.edu/topics-of-interest/human-or-animal-subjects/human-subjects/research-in-schools-2/>

Responsibility:

Execution of the SOP:
Principal Investigator
Study Team Members
IRB Staff

IRB Members
Registrar's Office

Reference:

Based on guidance from University of Wisconsin IRB: "Research in K-12 Schools" as well as guidance from the University of Washington IRB: "SOP Research Involving Students".

Approval and Version History:

Please contact irb@gmu.edu if you have any questions about this policy or the version and approval history.

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Approved By	Title and Division	Date Approved
Aurali Dade	Associate Vice President, Research Development, Integrity and Assurance	February 22, 2017
Laurie Meamber	IRB Chairperson	February 22, 2017