



DISTRICT OF COLUMBIA  
PUBLIC SCHOOLS

# DCPS Process and Requirements to Conduct Research or Obtain Confidential Data

Updated September 2021

All information for requesters is included herein.

Beginning October 1, 2021, complete proposals should be uploaded at <https://dcgov.app.box.com/f/31df92ef9e58495a81c9480f2d2d3414>. An email confirming receipt will be sent within one week of proposal upload.

All other inquiries about proposals and research should be sent to [researchrequests@k12.dc.gov](mailto:researchrequests@k12.dc.gov).

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## Introduction

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*We want to make DCPS the best urban school district in the country. To this end, we welcome high-quality research in DCPS using our data. We strive to create favorable conditions for research while respecting instructional time and individual privacy.*

- **DCPS believes in the power of research to improve the body of knowledge related to learning and development.** We welcome partnerships with the research community whose findings and results will benefit our students and/or staff or contribute to the wider improvement of public education.
- **DCPS exclusively approves proposals that meet professional standards** for research design and ethical practices **and have merit and relevance for the school system.**
- **DCPS requires that research supports our values of equity and anti-racism.** Equity at DCPS means creating an environment in which we eliminate opportunity gaps, interrupt institutional bias, and remove barriers to academic and social success, particularly for students of color. Read more from the Equity Strategy and Programming Team [here](#).
- **DCPS does not approve proposals that include randomized control trials** in which students are denied services or there is deceit of students in their application to a program. Please see Appendix II for additional information.
- **“Research”** refers to any activity aiming to increase the existing body of knowledge. It encompasses all investigation, measurement, and evaluation activities, including design, pilots, data collection and analysis, interpretation of results, and conclusions and recommendations. Research may include primary data collection, secondary data usage, or both. **“Data collection”** includes, but is not limited to, interviews, focus groups, surveys, tests, observations, analysis of written documents, and experimental designs. This document governs requests to conduct research in DCPS or obtain data that:
  - Exist, or must be constructed based on existing data, or do not exist and must be collected.
  - Are disaggregate (including student- and other individual-level data) or aggregate where identification is possible explicitly or implicitly (e.g., school-level data on subgroups smaller than 10 individuals).

## Important Restrictions

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- **DCPS is committed to protected DCPS students and staff, their privacy, and that of their data.** We have a legal and ethical obligation to protect the privacy of our students. The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.
- **Requesters may not request permission directly from schools or departments to conduct research.** Individual schools and departments are not authorized to grant permission for research; all research and confidential data requests, including individual-level data requests, must be submitted to the Office of Data Systems & Strategy for review and approval. Researcher **may** contact schools or departments directly to **request a letter of support** from an internal DCPS advocate (see p. 6).
- Requesters have the right, consistent with scientific standards, to publish, present, or use results from the research or data analysis, but only if the publication, presentation or use does not permit personal identification of DCPS students or their parents by individuals other than representatives of the requester. DCPS may require that schools or the District not be identified. To enable DCPS to protect the confidentiality of previously identified confidential information disclosed to the requester, **the requester must provide to DCPS any proposed publications or presentations which are to make public any findings, data, or results of the research or data analysis for DCPS's review and comment at least fourteen (14) days prior to submission of a manuscript or abstract for publication or the date of the presentation.** In some instances, and at its sole discretion, DCPS may also require the right to approve proposed publications or presentations, as well as co-authorship with DCPS staff. For multi-year projects, the requester must agree to provide annual interim reports to DCPS for internal use. If DCPS does not receive any updates, the Office of Data Systems & Strategy may choose not to fulfill subsequent data requests or to terminate the project.
- To prioritize student well-being and protect student learning time, any research interference with school instruction and operations must be kept to a minimum.

## Acceptable Types of Research

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The District of Columbia Public Schools (DCPS) Office of Data Systems & Strategy has developed this document to establish the requirements for requesters applying for authorization to conduct research in DCPS and/or to receive data DCPS has deemed confidential, personal, and private (Confidential Data), and ensure compliance with federal and District of Columbia laws and regulations.

- **Confidential data are:**
  - Any student records which contain Personally Identifiable Information, as that term is defined by 34 CFR 99.3 of the Family Educational Rights and Privacy Act;
  - Any employment records which contain individual level data (i.e. information about individual employees); and
  - Aggregate data constructed from student or employment records comprising a group size of fewer than ten individuals.
- DCPS employees seeking data **for their job** should submit their requests directly in the Data Request Tool. DCPS employees with questions about using the [Data Request Tool](#) for data requests that are part of their work should reach out to [dcpsdata.strategy@k12.dc.gov](mailto:dcpsdata.strategy@k12.dc.gov). DCPS employees conducting research for graduate work must still submit a proposal using the link on our website and should reach out to [researchrequests@k12.dc.gov](mailto:researchrequests@k12.dc.gov) with questions.

**Below are the types of research proposals that we accept for review.**

- Proposals for research activities originating within DCPS offices, departments, divisions, and other units, transmitted through their central office administrative channels.
- Responses to DCPS requests for proposals for external audits and research.
- Unsolicited research proposals that support DCPS's strategic priorities (see Appendix I, p.13) from (a) individuals (non-students), (b) organizations independent of DCPS, or (c) DCPS employees fulfilling graduate requirements. Please note that DCPS does **NOT** accept research proposals from graduate students who are not DCPS employees.

## Requirements for Conducting Research: Checklist

Please use this checklist to ensure that all required elements are included. Incomplete proposals will not be reviewed.

**Starting on October 1, 2021, research proposals should be uploaded at this link rather than being submitted by email: <https://dcdgov.app.box.com/f/31df92ef9e58495a81c9480f2d2d3414>.**

Proposals can be uploaded as one file or as multiple files (up to 10 files may be uploaded at one time).

Elements required for the research proposal are:

- △ Cover sheet (see website for downloadable document);
- △ Narrative description of research proposal (see pages 8-9 for detailed description of narrative);
- △ Letter of support from the study's internal DCPS advocate;\*
- △ Evidence of IRB approval and any IRB-approved forms, including consent forms;
- △ If applicable, copy of any letter to be sent to principals, teachers, parents, or others;
- △ If applicable, near-final copy of all instruments (e.g., interview and observation protocols, surveys, assessments). For online materials, include a list of all items and relevant information in addition to the link;
- △ If applicable, consent forms to be given to participants or parents (see Appendix IV and V for more information on consent forms); and
- △ Brief biographical sketches of all key personnel (please do not include CVs or resumes).

\*The letter of support can be uploaded with the research proposal or separately emailed by researcher or DCPS advocate to [researchrequests@k12.dc.gov](mailto:researchrequests@k12.dc.gov). The letter of support must include **the name of the requester and organization, a statement of support, and an indication of understanding of what participation in the research study would entail, particularly of student and staff time.**

- If the study involves primary data collection in only one school, the school principal should act as the internal DCPS advocate.
- If the study involves primary data collection in multiple schools, a letter of support is required from each principal *and* may be required from a DCPS Chief, depending on the number of schools involved.
- If the study only requires secondary administrative data, the preferred DCPS advocate is a DCPS Chief. However, a staff member at the director level or above may sponsor the study if they copy their office chief on the letter of support.
- If the researcher has not worked with a DCPS staff member before, the [DCPS organizational chart](#) may help identify an appropriate advocate. Researchers may contact principals or staff members directly to explain their project and request advocacy.

# Requirements for Conducting Research: Details

## 1. Proposal Cover Sheet for DCPS Research Review Board

Please download this cover sheet in editable format on [our website](#).

Date:

Project Title:

Researcher and Organization Name(s):

Researcher Email(s):

**\*Please click  where relevant. Remove this line and all highlighted text before submitting.**

| Issue   | Details  |
|---|--|
| Description:<br><input type="checkbox"/> Program<br><input type="checkbox"/> Research   | <ul style="list-style-type: none"> <li>Briefly summarize proposal in this cell.</li> </ul>   |
| Timeline:<br><input type="checkbox"/> 2019-20<br><input type="checkbox"/> 2020-21<br><input type="checkbox"/> 2021-22<br><input type="checkbox"/> 2022-23 | <ul style="list-style-type: none"> <li>Specify activity/activities in each year (through the estimated date of publication) in this cell.</li> </ul>   |
| Data Collection From/in Schools:  | <ul style="list-style-type: none"> <li>Briefly summarize any planned primary data collection in schools in this cell, or mark as N/A.</li> </ul>   |
| Data Requested from DCPS:   | <ul style="list-style-type: none"> <li>Briefly summarize all data that will be requested from DCPS Central Office in this cell, or mark as N/A.</li> </ul>   |
| DCPS Research Priority:   | <ul style="list-style-type: none"> <li>List one or more DCPS research priorities (see Appendix I) in this cell. Proposal narrative should include further explanation of how the project supports these priorities. Note that all proposals should address the priority "Promote Equity."</li> </ul> |
| DCPS Advocate(s):   | <ul style="list-style-type: none"> <li>List the name, email, role, and department of your DCPS Advocate in this cell. See p. 6 for more information.</li> </ul>  |
| IRB Approval.<br><input type="checkbox"/> Yes <input type="checkbox"/> Pending<br><input type="checkbox"/> No <input type="checkbox"/> IRB Exempt         | <ul style="list-style-type: none"> <li>Add notes on IRB approval (if necessary) or leave this cell blank.</li> </ul>   |

2.

## 2. Narrative Description of Research Proposal

All requests must be submitted in writing. The following elements are typically included. Not all items may be relevant for all proposals, and DCPS reserves the right to require additional materials. The proposal must be presented coherently and contain whatever elements are essential to describe a scholarly investigation of an educational matter. Reviewers will consider the written presentation of the proposal as a sample of the quality to be expected in the final report of the study. **Proposal narratives may not exceed 15 pages in length, in 11-pt Calibri font, single-spaced, with 1" margins.**

- Title of the study.
- Name, title, and contact information of senior requesters.
- Executive summary or abstract (no more than 200 words).
- Statement of the educational problem and review of literature and/or previous research.
- Objectives of the study, research questions, hypotheses.
- Significance of the problem, study, and findings to DCPS's operations or the educational services provided to DCPS students.
- Indication and brief summary of the DCPS research priority under which the project falls (see Appendix I). All research should address the priority to **"Promote Equity"** in addition to any other priorities covered by the proposed project. This summary should include an explanation of how the research will support DCPS's anti-racist efforts. Read more from the Equity Strategy and Programming Team [here](#).
- Setting (i.e., all of DCPS or only certain grades, classrooms, etc.).
- Sample and selection.
- Research design/methodology.
- Data and variables requested and/or to be collected. If conducting primary data collection, please include:
  - Data collection plan and schedule: Include a **description** of school/student/staff/other involvement and the **time commitment** requested from them for data collection, treatment, or instructional procedures. Specify how and where data are to be collected, by and from whom, who is to be recruited to participate, and how recruitment will take place. Note that:
    - No DCPS staff time or resources (e.g., DCPS email) may be used to recruit participants for the research study, and school staff may not be utilized to collect data.
    - The DCPS Central Office does not grant permission for the use of DCPS school buildings for data collection. This arrangement must be made with the school principal when and if the proposal is approved. Participation is at the discretion of principals.
    - All non-DCPS personnel participating in primary data collection must submit to any **background checks** requested by DCPS, including a criminal background check as required by the Criminal Background Checks for the Protection of Children Act of 2004 (D.C. Code § 4-



- 1501.01, et seq. (2009)) and any rules promulgated thereunder.
- Research approval from DCPS does not guarantee schools or individuals willing to participate in the Project.
  - Description of how principals and teachers will be informed of the research project, their role in it, and how their willingness to host/participate in the study will be sought.
  - If applicable, plan to provide parents/guardians access to surveys or materials that will be used with their children in school, including timeline.
  - If applicable, description of any compensation requester proposes to provide for participation in research. Please note that **outside organizations may not compensate DCPS staff directly in any way**. Please see Appendix VI or contact [researchrequests@k12.dc.gov](mailto:researchrequests@k12.dc.gov) for more information.
- If applicable, case for exception to The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) under which release of data or permission to collect data without consent is requested (see Appendix III). Please include the specific exception under which you are applying and make a clear case for it (e.g., how and why this work will ultimately improve instruction).
  - Information on consent process and protection of data and privacy:
    - Description of how parents will be informed of the research project, and how parental written permission will be sought for students' participation and release of student data (if applicable).
    - Plan for the protection and maintenance of the privacy of students and participants in the research, as well as the protection of data.

## Submission and Approval Process

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### Review and approval process

1. Research proposals and requests for confidential data, including individual-level data, must be submitted electronically to the Office of Data Systems & Strategy. **Starting on October 1, 2021, research proposals should be uploaded at this link:** <https://dcgov.app.box.com/f/31df92ef9e58495a81c9480f2d2d3414>. Proposals can be uploaded as one file or as up to 10 separate files. With questions about proposals, contact [researchrequests@k12.dc.gov](mailto:researchrequests@k12.dc.gov). Incomplete proposals will not be reviewed.
2. Initial review will take place following receipt of a complete proposal, provided the proposal was received by the submission due date (below). In cases where the Office of Data Systems & Strategy receives a high volume of proposals in the same month, proposal reviews may be delayed. Requesters will be informed of the delay when they submit a proposal.
3. Following the initial review, DCPS will notify requesters by email of approval, denial, or a need for additional information. Depending on how much additional information is needed, the Office of Data Systems & Strategy may not be able to review and provide feedback until the next month's review session.
4. The Chief of the Office of Data Systems & Strategy or his/her designee shall approve or deny requests to receive confidential data or conduct research.<sup>1</sup> Decisions to provide confidential data and grant permission to conduct research will be emailed to the applicant. *Data may not be obtained and research activities may not begin without first following the procedures outlined in this policy and securing the necessary approvals.*
5. If a research proposal or request for confidential data is approved, the Office of Data Systems & Strategy will issue a Memorandum of Agreement (MOA) and, if the research involves confidential data, a Confidentiality Agreement for the requester to sign. The MOA is the official document from DCPS that allows the proposed research activity to begin. The MOA does not guarantee participation of schools or research subjects; research may only occur with the consent of the school principal(s) and research subject(s). A principal may choose to restrict the requester's access to the school, students, and staff to minimize disruption to school activities.
6. If student data is requested, a **secure FTP site must be used** to transmit confidential data. The Office of Data Systems & Strategy will provide the requester with details.

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<sup>1</sup> The Office of Data Systems & Strategy may place additional conditions on requesters as deemed necessary, including but not limited to requirements related to insurance and criminal background checks. Approval of a research project or confidential data request may be withdrawn for any reason at any time.

## Timeline

Proposals are reviewed monthly. Below is the schedule of upcoming submission due dates of requests for confidential data and research requests, including new proposals, resubmissions, and continuing projects. Proposals must be received by close of business on the submission due date to be considered for inclusion in the following month’s review meeting. Proposals are reviewed in the order in which they are received.

| Submission Due Date | Proposal Review Date* |
|---------------------|-----------------------|
| August 27, 2021     | September 2, 2021     |
| September 24, 2021  | October 7, 2021       |
| October 29, 2021    | November 4, 2021      |
| November 26, 2021   | December 2, 2021      |
| December 31, 2021   | January 6, 2022       |
| January 28, 2022    | February 3, 2022      |
| February 25, 2022   | March 3, 2022         |
| April 1, 2022       | April 7, 2022         |
| April 29, 2022      | May 5, 2022           |
| May 27, 2022        | June 2, 2022          |

\*All dates subject to change without notice.

DCPS cannot guarantee a faster review under any circumstances, although we will make every effort to process requests swiftly. **We strongly encourage submission of research requests at least 90 days in advance of proposed research commencement.** This period allows sufficient time for both the proposal process and the MOA process.

For requesters seeking to conduct or begin research in the current school year, we recommend submitting by the January submission due date at the latest. Please keep in mind that we put MOAs in place for all our approved studies and that research cannot begin until the MOA is finalized, which extends the time of the entire approval process.

Due to the number of requests that the Office of Data Systems & Strategy receives, our ability to review and support external research projects and to provide access to student data and data that require substantial manipulation (e.g., merging different data sources or across multiple years) is limited. DCPS reserves the right to start charging fees at any time for data and research requests not covered by the Freedom of Information Act. Requesters will be notified of the cost before it is incurred.

# Appendices

## Appendix I: Research Priorities

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### 5 DCPS Strategic Priorities

- **Promote Equity:** Define, understand, and promote equity so that we eliminate opportunity gaps and systematically interrupt institutional bias.
  - Focus on equity across all DCPS
  - Offer programming that support students of color
  - Prioritize budgeting and resources for students who need them most
- **Empower Our People:** Recruit, develop, and retain a talented, caring, and diverse team
  - Infuse our values into all that we do
  - Improve teacher pipeline, especially for bilingual teachers and male educators of color
  - Strengthen school leadership development
- **Ensure Excellent Schools:** Increase the number of excellent schools throughout the city
  - Grow schools based on need and promote diversity and innovation, including multilingual or magnet programs
  - Increase attendance and enrollment
- **Educate the Whole Child:** Provide rigorous, joyful, and inclusive academic and social emotional learning experiences to ensure all students are college and career ready.
  - Embed social emotional learning in our classrooms
  - Offer new middle school courses and extracurriculars
  - Expand access to college and career preparation
  - Strengthen instruction for special education students and English Learners.
  - Focus on early literacy
- **Engage Families:** Ensure communication and deepen partnerships with families and the community.
  - Involve families and the community in children's learning, including through home visits
  - Improve communication with and listen to families

## Appendix II: Factors Typically Considered in the Approval Process

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DCPS receives a high volume of requests to conduct research in the district each year, all of which have some cost to implement, often in student, teacher, or staff time. For each proposal, we weigh the potential cost against the potential benefit to DCPS students, as well as considering factors contributing to feasibility of the study, such as the overall volume of research currently taking place in the district. We ask how each proposal has the potential to improve teaching, learning, and school climate for our students. This page lists some, but not all, of the particulars we may consider.

- The need for DCPS and the schools to safeguard the personal and legal rights of students, parents, and staff.
- DCPS's need for the data and/or findings likely to be produced.
- Potential to produce concrete resources, including training opportunities; policy guidance; or actionable recommendations.
- Technical soundness.
- Appropriateness of the research topic for support in the public setting.
- The type of research design proposed in the study. As a rule, DCPS does not approve proposals based on randomized control trials. The DCPS Office of Data Systems & Strategy may deny a proposal if students are denied services or if there is deceit of students in their application to a program. In some instances, DCPS will approve studies that leverage natural experiments where randomization occurs in the normal provision of services or where treatment and control groups are receiving different, comparable interventions.
- Availability of research sites and subjects of the kinds requested.
- The kinds and number of data-gathering procedures or instruments to be used in the study.
- The kinds of background data on subjects requested and the kinds of information of a personal nature to be secured from the subjects themselves.
- The nature and amount of interruptions to the ongoing education program, particularly any instructional time that would be lost due to the study.
- The cost in participation time for DCPS teachers and school staff.
- The amount of secondary data requested (including the number and type of variables, the scope of years, and number of schools and students in the data request).

## Appendix III. Conditions for Access to Confidential Data

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### 1. Access to Student Data and Students

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. FERPA exceptions allow schools to disclose information from a student's education record, without consent, only to selected parties, for selected research topics and under certain conditions (34 CFR § 99.31). It is the responsibility of the requester to identify and justify the relevant FERPA exception. The requester and their staff will also have to sign the DCPS Confidentiality Agreement, along with the DCPS Memorandum of Agreement (MOA).

If the proposed research or data request does not fit a FERPA exception, the requester must obtain the written informed consent of participants or of a parent on behalf of a student prior to conducting research activities or collecting personally-identifiable information from or on students. Students under 18 years old cannot participate in research without the informed consent of a parent or legal guardian. For students who are 18 or over (or an emancipated minor), the requester must receive written informed consent from the student. Requirements for consent forms are as follows, regardless of the requester's organization's IRB requirements:

- All consent forms must comply with federal and District of Columbia laws and regulations regarding confidentiality of student records and the protection of study participants, and be approved by the requester's organization's IRB.
- Parent consent forms must be written in easily understood language. The information to be included is listed in Appendix IV.
- All forms must be made available in all relevant languages. Translations and their cost are the responsibility of the requester.
- The requester must keep copies of all consent forms, and make them available to parents and DCPS staff upon request.
- The consent form is to be printed on the requester's stationery. Consent forms may not indicate DCPS support of the study

### 2. Access to Other Individual Data and Other Individuals

Prior to conducting research activities or collecting personally-identifiable information from staff, the requester must obtain the written informed consent of participants. Requirements for consent forms are as follows, regardless of the requester's organization's IRB requirements:

- Informed staff consent forms must be approved and stamped by the requester's organization's IRB.

- Consent forms must be written in easily understood language and should provide the information listed in Appendix IV.
- All forms must be made available in all relevant languages. Translations and their cost are the responsibility of the requester.
- The requester must keep copies of all consent forms, and make them available to DCPS staff upon request.
- The consent form is to be printed on the requester's stationery. Consent forms may not indicate DCPS support of the study.

### 3. Policy on Active vs. Passive Consent from Parents and Guardians

This section establishes the conditions under which the **active, written consent of parents and guardians** is required for any survey, analysis, or evaluation involving individual students under the age of 18. DCPS has adopted parental consent requirements derived from the Federal Protection of Pupil Rights Amendment (PPRA) (20 U.S.C. § 1232h; 34 CFR Part 98). PPRA requires adherence to these standards *when a survey, analysis, or evaluation is funded by the U.S. Department of Education*. DCPS is adopting these requirements for *all research conducted with students irrespective of the funding source* in order to establish consistent and appropriate guidelines.

- DCPS requires that schools and contractors make materials available for inspection by parents and eligible students (emancipated minors and those who are 18 or older) if those materials will be provided to students in connection with a survey, analysis, or evaluation in which their children participate. In addition, schools and contractors must obtain active informed, written parental consent before minor students participate in any survey, analysis, or evaluation that asks students for information concerning the following topics:
  - Sex behavior and attitudes.
  - Mental and psychological problems potentially embarrassing to the student and his/her family.
  - Critical appraisals of other individuals with whom respondents have close family relationships.
  - Political affiliation.
  - Illegal, anti-social, self-incriminating, or demeaning behavior (e.g., violence, drug use).
  - Communications with persons in legally recognized privileged or analogous relationships, such as with lawyers, physicians, or ministers.
  - Religious practices, affiliations, or beliefs of the student or student's parent.
  - Income (other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program).



Parents must be informed of the topics of the survey, analysis, or evaluation before being asked to consent to their children's participation.

- Additionally, DCPS requires active consent for student participation in focus groups and one on one interviews or assessments.
  - Requesters are required to minimize potential mental harm to participants by making the following provisions:
    - Providing a prompt opportunity for participants to obtain appropriate information about the nature, results, and conclusions of the research.
    - Taking reasonable steps to correct any misconceptions that participants may have of which the requesters are aware.
    - When becoming aware that research procedures have harmed or could harm a participant, taking reasonable steps to minimize the harm.
  - In the event of the DCPS administration of a survey containing questions falling under the protected categories, DCPS safeguards the privacy of this information.
  - Parents or students who believe their rights under PPRA in connection with research funded by the U.S. Department of Education may have been violated may file a complaint with the Department by writing the Family Policy Compliance Office. Complaints must contain specific allegations of fact giving reasonable cause to believe that a violation of PPRA occurred.
- △ For more on PPRA see: <http://www.ed.gov/policy/gen/guid/fpco/ppra/index.html>

Requesters may ask for a special review of their proposal to be considered for a **waiver of the active consent policy** articulated above only if the data collected are required for federally-mandated reporting AND there is currently no other system in place to collect the federally-mandated data.

For a waiver of active consent to be considered, requesters must implement the following to demonstrate due diligence in ensuring the respect of the rights of students and parents:

- Put in place a thorough procedure to ensure that requesters can address the concerns which drive the active consent policy including:
  - Take steps to ensure INFORMED consent by parents, including but not limited to: following-up with them individually; ensuring that they are aware of both the project **and** the sensitive topics involved; ensuring that parents know that they have the opportunity to opt out and how; identifying parents who opt out. Requesters must document these measures and file this documentation as well as all forms collected from parents so they can be shown to DCPS upon request.
  - Translate all forms into the languages in which DCPS provides translations of vital documents and interpretation services to parents in accordance with the DC Language Access Act of 2004 (since 1997 these languages have been Spanish, Chinese, Vietnamese, French and Amharic) and other languages as needed.

- Clearly describe efforts and activities to mitigate risks, including debriefing sessions in which trained facilitators will answer student questions and provide appropriate resources.
- Document the special circumstances surrounding the project:
  - Clearly articulate the nature and purpose of the project and its requirement to meet federally-mandated reporting (this/those report(s) should be cited).
  - Provide a clear articulation of who will have direct access to confidential data, including individual-level data, and how the data will be stored and protected; include a clear statement that raw (individual-level) data will not be re-disclosed or repurposed, regardless of whether student identifiers are included.
- Submit requests for waivers early enough that, if the waiver is denied, requesters have ample time to implement the active consent process, especially time to collect written consent forms.

Submit requests for waivers as described here for each year of multi-year projects. Each year, requesters must document that the data collected are required for federally-mandated reporting AND there is still no other system in place to collect the federally-mandated data. Every change to the data collection instruments must be highlighted.

## Appendix IV: Information to be Included in Parent Consent Forms

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- Title of the study and name, title and organization of the requester(s).
- Purpose(s) of data collection.
- Description of what participants will be asked to do.
- Amount of time required of participants.
- Notice that participants will be audio- or videotaped (if applicable) with an explanation of how the recordings will be used and what happens to the tapes after the research is completed.
- Description of confidential data the requester is requesting and how and when data will be destroyed.
- Notice 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 or toll-free telephone number of requester(s).
- Space and lines for the student's name and parent/guardian signature. **There must be a check box for either consent or refusal to participate** and the parent signature must refer to "Yes, I agree to have my child participate" or "No, I do not give consent for my child to participate".
- A summary of what participants will be asked to do and/or the confidential data to be requested from DCPS should appear immediately above the parent's signature.
- In accordance with the Federal Protection of Pupil Rights Amendment (20 U.S.C. § 1232h; 34 CFR Part 98) requirement that parents/guardians have access to the materials that will be used in school with their children, consent forms must include the following text: "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 (XXX) XXX-XXXX to obtain a copy of the questions or materials."

## Appendix V: Information to be Included in Consent Forms for Adults Other Than Parents

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- Title of the study and name, title and organization of the requester(s).
- Purpose(s) of data collection.
- Description of what participants will be asked to do.
- Amount of time required of participants.
- Notice that participants will be audio- or videotaped (if applicable) with an explanation of how the recordings will be used and what happens to the tapes after the research is completed.
- Description of confidential data the requester is requesting and how and when data will be destroyed. **There must be a separate yes/no check box consenting to the release of individual-level data.**
- Notice 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 or toll-free telephone number of requester(s).
- Space and lines for the individual's name and signature. **There must be a check box for either consent or refusal to participate.**
- If the consent form is longer than one page, a summary of what participants will be asked to do and/or the confidential data to be requested from DCPS must appear immediately above the signature.

## Appendix VI: Information Needed for Release of Student Records

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If the researcher does not qualify for a FERPA exception, parents/guardians must provide signed and dated written consent to release records to a third party. All written consents must comply with both federal and District regulations found in the Family Educational Rights and Privacy Act (FERPA) at 34 CFR § 99.30 and the District of Columbia Municipal Regulations (DCMR) at 5-E DCMR § 2605. The guidelines below summarize these requirements. For research projects, these requirements are in addition to those found in Appendix IV. A DCPS approved consent to release records form can be provided upon request, but researchers are welcome to create their own forms given the requirements below are met:

- Include parent signature and date of signature as well as date of intended release of the records.
- If the consent is signed by an adult student (18 years of age or older), include a statement certifying that the signing student is 18 years of age or older.
- If the consent is signed by the parent/guardian of a minor student, include a statement certifying that the student is not yet 18 years of age.
- Specify the exact records to be disclosed (this has to be specific as to type of record and include any applicable date range).
- State the purpose of the disclosure.
- Identify the party by name to whom the records disclosure may be made.
- Include the name of the DCPS party who is responsible for the release of the records (this can be the school principal or registrar, or if no individual is known, please indicate “DCPS Office of Data Systems & Strategy”).
- State that the person signing the consent acknowledges and understands that they had an opportunity to review the records to be disclosed prior to signing the consent form.
- Clearly state (in other words, bolded or set off by itself) that the person signing the consent has the right to inspect and review the records to be disclosed and the right to challenge the contents of such records.

## Appendix VII: DCPS Policy on Compensation for Participation in Research Studies

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*There is no fee to conduct research in or request data from DCPS, and the district does not accept compensation for research. However, researchers are free to use the DCPS process for donating to the district or individual schools. Some researchers also offer compensation directly to student and family participants to express gratitude or to encourage participation. Intentions to donate to or compensate schools or participants should be outlined in research proposals; all such donations are subject to DCPS approval. Any compensation is subject to DCPS approval.*

### **1. Donating to schools for participation in research**

- Researchers may offer donations to schools that participate in research to express gratitude or to incentivize participation.
- Donations must meet DCPS requirements for donating to schools:
  - Donations can be made online, via check, or through in-kind items (cash is not accepted).
  - Donations under \$500 may be made directly to schools using the “[Drop-Off Form](#)” for donations. Researchers should contact schools (see a [list of schools](#)) for further information about the best way to donate.
  - Donations of \$500 or over must be coordinated through the Central Office. Please contact them via this online [Donation Request Form](#).
- Researchers are also free to make donations through DonorsChoose.org or to donate to school PTAs in accordance with the rules and regulations of those nonprofit organizations.

### **2. Compensating teachers/staff for participation in research**

- Researchers may never compensate DCPS employees (in money, gift cards, or goods and services) for participation in a DCPS-approved research project. DCPS employees may not receive direct compensation from outside sources for any activity that is part of their role as a DCPS employee.
  - Example: A teacher is invited to take an online survey about math instruction in DCPS as part of an approved study to improve math literacy in elementary schools. Even if the survey is voluntary and taken outside of school time, the teacher cannot be compensated for taking the survey.
- Researchers may donate directly to schools and can request that donations support a specific teacher’s classroom (see “Compensating schools for participation in research” above).
- Researchers are also free to make donations through DonorsChoose.org to a teacher’s classroom project, if applicable.

### **3. Compensating students for participation in research**

- Researchers are free to offer compensation directly to students for participation in research. DCPS considers itself to not be involved in any such commitments or transactions between students and researchers.
- Any compensation should be approved by DCPS.

**4. Compensating parents/guardians for participation in research**

- Researchers are free to offer compensation directly to parents/guardians for participation in research. DCPS considers itself to not be involved in any such commitments or transactions between parents and researchers.
- Any compensation should be approved by DCPS.