



SCHOOL BOARD ACTION REPORT

DATE: July 1, 2019
FROM: Denise Juneau, Superintendent
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For Introduction: July 10, 2019
For Action: August 28, 2019

1. TITLE

Approving Board Policy No. 3232 Parent/Guardian & Student Rights in Administration of Surveys, Analysis or Evaluations.

2. PURPOSE

This action amends Board Policy No. 3232 to incorporate language from a model policy from the Washington State School Directors' Association (WSSDA) and federal policy guidance in the Protection of Pupil Rights Amendment (PPRA).

3. RECOMMENDED MOTION

I move the School Board amend Board Policy No. 3232, Parent/Guardian & Student Rights in Administration of Surveys, Analysis, or Evaluations, as attached to the Board Action Report.

4. BACKGROUND INFORMATION

a. Background

This action report considers Board Policy No. 3232, Parent & Student Rights in Administration of Surveys, Analysis, or Evaluations, a policy that affirms the rights of parents/guardians and students in the protection of student data privacy. This policy provides detailed language directly from the Protection of Pupil Rights Amendment (PPRA) and mirrors a model policy from the Washington State School Directors' Association (WSSDA). WSSDA recently updated its language to better match the language at the federal level. Additionally, the District recently received direct guidance from the U.S. Department of Education regarding the scope of the PPRA. The proposed

changes to this policy keep the district’s policy in line with the WSSDA model policy, the language in the Federal code, and this guidance from the U.S. Department of Education.

Board Policy No. 3232 also has a related Superintendent Procedure. The Superintendent Procedure will continue to go through an engagement process for revisions and will be finalized by ~~August~~September 2019.

Board Policy No. 3232 also cross-references Board Policy No. 4280, Research Activity. This policy and its accompanying procedure (4280SP) outline the process for research review in the district, and further affirm that studies must adhere to federal laws, including both the Protection of Pupil Rights Amendment (PPRA) and the Family Educational Rights and Privacy Act (FERPA). Policy No. 3232 makes these rights and responsibilities explicit, and the revised language from WSSDA has provided an opportunity for further review of 4280SP and the research review application to ensure alignment and compliance with the PPRA. Similar to the process for 3232SP, 4280SP will go through an engagement process for revisions and will be finalized at a later time.

b. Alternatives

Since Board Policy No. 4280, Research Activity, states in broad terms that research activity must comply with the Federal Protection of Pupil Rights Amendment, the Board could choose to repeal Policy No. 3232 as the policy protection exists in the other. This is not recommended because, while having the detailed language in Policy No. 3232 may be redundant, it provides additional transparency around the rights of parents/guardians and students.

c. Research

Research conducted by WSSDA to ensure compliance with federal protections in the federal Protection of Pupil Rights Amendment (PPRA).

5. FISCAL IMPACT/REVENUE SOURCE

Fiscal impact to this action will be N/A.

This motion has no fiscal impact. However, there may be some cost associated with the notification requirements in the Superintendent Procedure for Policy No. 3232. Although the procedure is still under revision, printing costs for the PPRA notification in the “Back to School” packets is estimated at \$1,060 (\$0.02/page for 53,000 students) and will be covered through individual school budgets. Additional nominal costs may be identified as the procedure is revised.

Expenditure: One-time Annual Multi-Year N/A

Revenue: One-time Annual Multi-Year N/A

6. COMMUNITY ENGAGEMENT

With guidance from the District’s Community Engagement Toolkit and in consultation with the SPS Equity, Partnerships and Engagement Division, the action to revise Policy No. 3232 was determined to merit the *Tier 1: Inform* level of community engagement. Tier 1 engagement was conducted with a group of internal district staff (e.g. Communications, General Counsel, Behavioral Health) as well as external stakeholders that represent families and communities (i.e. Seattle Council PTSA, Public Health – Seattle & King County).

Using the Community Engagement Toolkit during the initial round of engagement, it was determined that the process for 3232SP and 4280SP would be *Tier 2: Consult/Involve* and accordingly would involve a broader set of internal and external stakeholders. Outreach for this phase has begun, and will include consultation with the City of Seattle, NAACP (including a student voice group), Southeast Seattle Education Coalition, Somali Community Services of Seattle, Public Health – Seattle & King County, Seattle Council PTSA and others.

The reasoning for this two-pronged approach is that it is critical that Policy No. 3232 be revised to be fully compliant with recent changes to federal law and also reflect specific guidance that SPS has received from the U.S. Department of Education regarding the scope of the Protection of Pupil Rights Act (PPRA). However, the district must then engage internal and external stakeholders to determine how to equitably notify families of these changes, as well as determine district procedures for certain aspects of the law where district discretion is noted, for example processes for opt-out consent in non-federally funded data collection efforts. Tier 2 (consult/involve) was determined to be the best fit for this level of engagement – however, we note that the process itself will be highly collaborative. For example, we will continue to use guiding documents from the Family Partnerships and Engagement department to facilitate the process using the “Leading by Convening: The Partnership Way” approach. This approach holds at its core that groups with authority over the issue join with groups that have influence in the field to strategize solutions to co-defined problems of practice (IDEA Partnership, 2014).

Not applicable

Tier 1: Inform (for policy revisions)

Tier 2: Consult/Involve (for procedural revisions)

Tier 3: Collaborate

7. EQUITY ANALYSIS

The Racial Equity Analysis Tool was used and greatly contributed to the above decision to pursue a more comprehensive, equity-focused engagement strategy for 3232SP and 4280SP. As mentioned above, Tier 1 engagement was planned in consultation with the SPS Equity, Partnerships and Engagement Division and initial outreach was conducted with a group of internal district staff (e.g. Communications, General Counsel, Behavioral Health) as well as external stakeholders that represent families and communities (i.e. Seattle Council PTSA, Public Health – Seattle & King County).

During these conversations, we used the Equity Analysis Toolkit to plan for future equitable engagement strategies. Specifically, during this initial outreach, we asked:

- How to identify and engage stakeholders from the racial and ethnic groups that are potentially impacted by the policy and procedures for 3232 and 4280;
- Potential negative impacts for specific student demographic groups, including English language learners and students with special needs;
- Potential benefits or unintended consequences of these policies and procedures; and
- How we can continue to partner with stakeholders to ensure educational equity for every student.

Feedback from the initial round of engagement suggested that we seek input from additional stakeholders in the future for the consult/involve phase of the work, most of whom are external to the district and represent historically marginalized communities. Recommended stakeholder outreach includes the City of Seattle, NAACP (including student voice group), Southeast Seattle Education Coalition, Somali Community Services of Seattle, Public Health – Seattle & King County, Seattle Council PTSA and others.

This outreach is underway, and the Superintendent Procedures ([the current version is](#) appended to this Board Action Report [for reference](#)) will reflect some of those recommendations. For example, feedback highlighted the importance of recognizing that the eight areas of “sensitive” data as outlined in the PPRA and Policy 3232 may disproportionately affect families that do not speak English in the home. To mitigate this, we will need to think through language access issues for all consent forms and opt-out notifications to families. We will also need to consider the needs of non-English speaking families when designing the strategy for general notification about the policy and procedure, as well as calendaring future assessments, evaluations, and/or instructional materials – for example necessary translations. A tiered strategy (e.g. for Title I schools) could be considered. Finally, stakeholder noted that many historically marginalized families that do not have access to technology-based communication systems, which may necessitate a nuanced strategy for outreach and communication. This may include post mail, but it also may include more current technology-based solutions (e.g. specific apps) for notifying families of new data collection efforts.

8. STUDENT BENEFIT

Amendment of the policy will provide greater clarity for parents, students and staff regarding the rights of parents and students in the administration of surveys, analysis or evaluations.

9. WHY BOARD ACTION IS NECESSARY

- Amount of contract initial value or contract amendment exceeds \$250,000 (Policy No. 6220)
- Amount of grant exceeds \$250,000 in a single fiscal year (Policy No. 6114)
- Adopting, amending, or repealing a Board policy
- Formally accepting the completion of a public works project and closing out the contract
- Legal requirement for the School Board to take action on this matter

Board Policy No. _____, [TITLE], provides the Board shall approve this item

Other: _____

10. POLICY IMPLICATION

Policy No. 3232 would be amended as described above.

11. BOARD COMMITTEE RECOMMENDATION

This motion was discussed at the Curriculum and Instruction Policy Committee meeting on June 11, 2019. It was also brought before the Committee on November 6, 2018, and included on the agenda for discussion on March 19, 2019.

On June 11, 2019, the Committee reviewed the motion and moved the item forward with a recommendation for ~~approval~~consideration by the full Board, pending amendments to the underlying policy and procedure.

Per the Committee's recommendations, the following changes were made to the policy: clarification of opt-in and opt-out requirements for the collection of student data from both internal district sources and external entities; and language changes to improve transparency and clarity regarding rights of parents/guardians and responsibilities of the District.


~~At the recommendation of the Committee, district~~District staff will continue to refine the Superintendent Procedure for Policy No. 3232, and will ~~include~~provide the procedure for reference ~~with to the Board Curriculum & Instruction Policy Committee following~~ the August 28, 2019 Board meeting ~~materials~~. Refinements being made at the recommendation of the Committee include detailed provisions on the following topics: alignment to federal law and guidelines; the right of parents to inspect materials, notification requirements regarding the policy/procedure and future data collection efforts; detailed parent/guardian consent information (including both opt-in and opt-out requirements); and district staff responsibilities.

12. TIMELINE FOR IMPLEMENTATION

Upon approval of this motion, the new policy will be shared with relevant departments and divisions (Teaching & Learning, Research & Evaluation, Legal, Grants and Fiscal Compliance) and will take effect immediately. It will also be posted on the SPS website and information will be included in Back to School packets for families.

13. ATTACHMENTS

- Board Policy No. 3232, (clean – for approval)
- Board Policy No. 3232, (tracked changes – for reference)
- Board Policy No. 3232 (clean – current version)
- Superintendent Procedure 3232SP (current – for reference)
- Board Policy No. 4280 (current – for reference)
- Superintendent Procedure 4280SP (current – for reference)

	<p style="text-align: center;">PARENT/GUARDIAN & STUDENT RIGHTS IN ADMINISTRATION OF SURVEYS, ANALYSIS OR EVALUATIONS</p>	<p style="text-align: center;">Policy No. 3232</p> <p style="text-align: center;">DATE</p> <p style="text-align: center;">Page 1 of 2</p>
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It is the policy of the Seattle School Board that, to protect student data privacy pursuant to federal law and guidelines, all materials used for research, evaluation, or analysis in a program or project, including surveys, assessments, or instructional materials, are available for inspection by parents and guardians.

Informed consent from parents/guardians and adult or emancipated minor students is required for all third-party research involving primary data collection from students. Policy No. 4280, Research Activity, provides broader policy guidance related to research activity conducted by external entities.

Pertaining to surveys and other forms of data collected internally by the district for research, evaluation, or analysis, the district will obtain informed consent from parents/guardians and adult or emancipated minor students in every situation wherein funding from the U.S. Department of Education is used, and which reveals student information concerning any of the following:

1. Political affiliations or beliefs of the student or the student's parent/guardian;
2. Mental or psychological problems of the student or the student's family;
3. Sex behavior or attitudes;
4. Illegal, anti-social, self-incriminating or demeaning behavior;
5. Critical appraisals of other individuals with whom the student has close family relationships;
6. Legally recognized privileged or analogous relationships, such as those of lawyers, physicians and ministers;
7. Religious practices, affiliations, or beliefs of the student or student's parent/guardian; or
8. Income (other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program).

In cases of district-led collection of student data that may concern the above eight categories, but is not funded by the U.S. Department of Education, the district shall notify parents/guardians and adult or emancipated minor students of their rights for refusal for their or their child's participation in the data collection activity.

The district shall establish and follow protocols to protect student privacy during the administration of any survey, analysis, or evaluation.

The Superintendent is authorized to develop procedures to implement this policy, as necessary.

Adopted: December 2011

Revised: [date]


Cross Reference: Policy No. 4280, Research Activity; 4280SP; 3231SP; 4060SP

Related Superintendent Procedure: 3232SP

Previous Policies:

Legal References: 20 U.S.C. 1232h(c) Protection of pupil rights; 34 CFR Parts 75, 76, and 98 (1984) Student rights in research, experimental activities and testing

Management Resources: *Policy News*, April 2003

	<p>PARENT/GUARDIAN & STUDENT RIGHTS IN ADMINISTRATION OF SURVEYS, ANALYSIS OR EVALUATIONS</p>	<p>Policy No. 3232 December 7, 2011DATE Page 1 of 12</p>
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It is the policy of the Seattle School Board that, to protect student data privacy pursuant to federal law and guidelines, ~~a~~All instructional materials, including supplementary materials and teachers' manuals, used for with any survey, analysis or research, evaluation, or analysis in a program or project, including surveys, assessments, or instructional materials, supported by federal funds are available for inspection by parents and guardians.

Informed consent from parents/guardians and adult or emancipated minor students is required for all third-party research involving primary data collection from students. Policy No. 4280, Research Activity, provides broader policy guidance related to research activity conducted by external entities.

Pertaining to surveys and other forms of data collected internally by the district for research, evaluation, or analysis, the district will obtain informed consent from parents/guardians and adult or emancipated minor students in every situation wherein funding from the U.S. Department of Education is used, and which reveals student information concerning any of the following. No student will be required as part of any project or program supported by federal funds to submit to survey, analysis or evaluation that reveals information:

1. Political affiliations or beliefs of the student or the student's parent/guardian;
2. Potentially embarrassing mental or psychological problems of the student or the student's family;
3. Sexual behavior and/or attitudes;
4. Illegal, anti-social, self-incriminating or demeaning behavior;
5. Critical appraisals of ~~close family members~~other individuals with whom the student has close family relationships;
6. Legally recognized pPrivileged or ~~similar~~analogous relationships, such as those of lawyers, physicians and ministers;
7. Religious practices, affiliations, or beliefs of the student or student's parent/guardian; or
8. Income (other than ~~information necessary to establish~~that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program), ~~without the prior consent of adult or emancipated students, or written permission of parents.~~

In cases of district-led collection of student data that may concern the above eight categories, but is not funded by the U.S. Department of Education, the district shall notify parents/guardians and adult or emancipated minor students of their rights for refusal for their or their child's participation in the data collection activity.

The district shall ~~make arrangements~~establish and follow protocols to protect student privacy during the administration of any surveys, analysis, or evaluation ~~and the collection, disclosure or use of personal information for marketing, sales or other distribution purposes.~~

The Superintendent is authorized to develop procedures to implement this policy, as necessary.

Adopted: December 2011

Revised: [date]


Cross Reference: Policy No. 4280, Research Activity: 4280SP; 3231SP; 4060SP

Related Superintendent Procedure: 3232SP

Previous Policies:

Legal References: 20 U.S.C. 1232h(c) ~~No Child Left Behind Act of 2001~~Protection of pupil rights;
34 CFR Parts 75, 76, and 98 (1984) Student rights in research, experimental activities and testing

Management Resources: *Policy News*, April 2003

	<p style="text-align: center;">PARENT & STUDENT RIGHTS IN ADMINISTRATION OF SURVEYS, ANALYSIS OR EVALUATIONS</p>	<p style="text-align: center;">Policy No. 3232 December 7, 2011 Page 1 of 1</p>
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All instructional materials, including supplementary materials and teachers manuals, used with any survey, analysis or evaluation in a program or project supported by federal funds are available for inspection by parents and guardians.

No student will be required as part of any project or program supported by federal funds to submit to survey, analysis or evaluation that reveals information concerning:

1. Political affiliations;
2. Potentially embarrassing mental or psychological problems;
3. Sexual behavior and attitudes;
4. Illegal, anti-social, self-incriminating or demeaning behavior;
5. Critical appraisals of close family members;
6. Privileged or similar relationships;
7. Religious practices, affiliations, or beliefs of the student or student's parent; or
8. Income other than information necessary to establish eligibility for a program, without the prior consent of adult or emancipated students, or written permission of parents.

The district shall make arrangements to protect student privacy during the administration of surveys and the collection, disclosure or use of personal information for marketing, sales or other distribution purposes.

Adopted: December 2011

Revised:

Cross Reference:

Related Superintendent Procedure:

Previous Policies:

Legal References: 20 U.S.C. 1232h(c) No Child Left Behind Act of 2001; 34 CFR Parts 75, 76, and 98 (1984) Student rights in research, experimental activities and testing

Management Resources: *Policy News*, April 2003

Superintendent Procedure 3232SP
**Parent & Student Rights in Administration of
Surveys, Analysis or Evaluation**



Approved by: s/S. Enfield Date: 12/16/11

Dr. Susan Enfield, Interim Superintendent

Right to Inspect

Parents, upon request, shall have the opportunity to inspect the following:

- A. Surveys created by a third party before the survey is administered or distributed by a school to students;
- B. Instructional material used as part of the educational curriculum; and
- C. Any survey document used to collect information from students.

Opt-Out

The notification shall include provisions to opt a student out of participating in:

- A. Any protected information survey, regardless of funding;
- B. Activities involving collection, disclosure, or use of personal information obtained from students for marketing or selling to others; or
- C. Involving any non-emergency, invasive physical examination or screening required as a condition of attendance, administered by the school, and not necessary to protect the immediate health and safety of a student.

Approved: December 2011

Revised:

Cross Reference: Policy No. 3232

	RESEARCH ACTIVITY	Policy No. 4280 December 6, 2017 Page 1 of 1
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Third party agencies or organizations that conduct research in Seattle Public Schools must comply with all federal and state laws as well as all Seattle Public School policies, procedures, and guidelines.

Permission to conduct research activities must be granted by central administration. Research proposals will be reviewed for the relevance of research (i.e. alignment to district strategic goals and priorities); rigor of research methodology; risk/benefit to participants; and burden to the district/schools. All principals and program managers may refuse to allow research projects to be conducted in their schools unless required by law or the Superintendent.

Research projects must comply with all applicable laws, regulations, and ethical codes, including the Family Educational Rights and Privacy Act (FERPA) and the Protection of Pupil Rights Amendment (PPRA). Research projects involving primary data collection from students or staff must be authorized by a Human Subjects Review Board, and researchers must undergo necessary clearances before contact is permitted. Research projects involving the collection of identifiable student-level data must obtain prior written and active informed consent of a parent/guardian on behalf of a minor student before data collection commences. Research projects involving analysis of student-level secondary data must have a Data Sharing Agreement between the District and the external party conducting the research prior to transfer of data.

Adopted: December 2017

Revised:

Cross Reference:

Related Superintendent Procedure: 4280SP

Previous Policies: E14.04

Legal References: The Health Insurance Portability and Accountability Act of 1996 (HIPAA; Pub.L. 104–191, 110 Stat. 1936, enacted August 21, 1996); Protection of Pupil Rights Amendment (PPRA) (20 U.S.C. § 1232h; 34 CFR Part 98); Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99)

Management Resources:

Superintendent Procedure 4280SP

Research Review Process

Approved by: s/Larry Nyland Date: 12/6/17

Dr. Larry Nyland, Superintendent



While Seattle Public Schools recognizes the value of supporting research, it does not guarantee the right to access Seattle Public Schools students, staff, or data for research purposes. If access is granted, the researcher may only access schools, students, staff, and data relevant to the research as approved by the district. Furthermore, the district reserves the right to modify the guidelines as needed and to request changes to multi-year approved research proposals or research proposals.

Research Proposal Categories

The District reviews three types of research proposals: internal research, external research, and partnerships/grants.

- A. Internal Research – Internal research does not require an application. Internal research includes: central office managers and directors who plan and conduct research on how to improve District services and programs within their area of supervision or as part of their general job duties; and school staff who conduct informal inquiries into classroom practices or piloting of new programs, products, or services.
- B. External Research – External research requires a full application (for first time applicants on a given project) or amendment form (for changes or extensions of ongoing approved external research). External Research includes:
 - Independent research conducted by individuals, organizations, or agencies not affiliated with the District. This includes community based organizations (CBOs) who do not have a formal research agreement as part of a Memorandum of Understanding (MOU) and/or DSA with the district and are conducting research studies;
 - Research conducted by District employees for purposes outside of their work duties and/or work hours (e.g. research conducted to fulfill degree program requirements);
 - Product research conducted by a company or entity to study a product's effectiveness; or
 - Voluntary surveys of District staff, students, or families developed by outside research institutions, non-governmental agencies or other entities.
- C. Partnerships and Grants – Partnerships and grants are evaluated on a case-by-case basis through consultation with the District, and may require that applicants fill out an application. Examples of Partnerships/Grants include:
 - Planned evaluation in grants to external sources with the District as sole or joint applicant;

- Voluntary government agency (federal, state, municipal, etc.) data collection efforts (e.g. state surveys) (Note: mandatory data reporting to state or federal agencies is not subject to research review);
- Mandatory surveys developed by outside non-governmental agencies or entities; or
- Community Based Organizations (CBOs) whose activities do not fall into the “research study” category as outlined in these guidelines, and who have a formal Memorandum of Understanding and/or Data Sharing Agreement (DSA) with SPS.

Additional Requirements

Depending on the nature of the proposed study, the following requirements may apply.

- A. **Data Requests** – If the research involves a request for secondary data (e.g., student achievement data) collected or maintained by Seattle Public Schools, a Data Request Form is required in addition to the Research Application.
- B. **Community-Based Organization (CBO) Research** – Community-Based Organizations (CBOs) frequently collect and/or request data from participating students, teachers, and/or staff within District schools and the central office. Standard language will be inserted in all Memoranda of Understanding and/or Data Sharing Agreements with the District that asks CBOs to determine if their data collection and analysis efforts constitute a research activity that merit review as part of the research review process. A research study by a CBO involves quantitative or qualitative data that are: a) systematically collected and analyzed to determine the degree to which services provided are “working”; and b) are presented to an external audience (e.g. funders, conferences, media). Examples of systematic studies of impact include quasi-experimental designs, Randomized Control Trial designs, and qualitative studies of perceived program effectiveness. Studies in this category must go through the full external research review process. CBOs with data collection activities that do not meet the definition above do not need to submit a research proposal. However, all materials using District data must contain caveats that explain that all reported information are purely descriptive in nature and do not indicate causal relationships.
- C. **Clearances** – If the assigned staff/researcher will be working with district students and have the potential to be unsupervised, they will need to obtain clearances in accordant with Board Policy 4265 SP.
- D. **Human Subjects/IRB** – If the research includes an intervention or interaction with a living person (i.e., student, teacher, staff, 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 a Human Subjects/Institutional Review Board (IRB). Surveys, interviews, student-level questionnaires and reviews of student files are all interventions or interactions that would require IRB review. Research that is typically exempted from IRB must include an exemption letter as part of the application. The fact that an IRB has approved a proposal for research does not mean that the District must approve it. IRB approval only means that the proposed research design is in compliance with the federal regulations regarding human subject research (which are consistent with Washington state law and SPS policy).

- E. Active Informed Consent and Assent – All external research that includes the collection of student-level data must have District-approved consent forms, as well as the prior written and active informed consent of a parent or legal guardian on behalf of a minor student before data collection commences. Active consent from the parent/guardian is also required for external research study recruitment if the study seeks students based on specific criteria considered to be protected information (e.g., a research study wishing to recruit bilingual students who have not met standard on the state assessment). Research that involves the collection of identifiable information must also have a Data Sharing Agreement (DSA) with the District. The researcher must retain all consent and assent forms, provide copies to the District, and must be prepared to make them available if a parent/guardian, teacher or school official questions a student's or staff member's participation. To avoid any perceived coercion, the invitation to participate in research is to be printed on the researcher's stationery, and not on that of any office or school of the Seattle Public Schools. Consent and assent forms may not indicate District support or approval of the research study. Students who agree to participate in a research study are required to sign an assent form. Active informed consent forms must also be signed by any staff asked to participate in research.

Research Review Committee

All external and partnership/grant proposals must be reviewed and approved by the Seattle Public School's Research Review Committee (RRC), which is comprised of staff from the Research & Evaluation department who will invite other relevant District or school staff as necessitated by the portfolio of research requests being reviewed. Approval from the RRC to conduct external research activities provides the researcher(s) with official permission to contact schools that may be interested in participating. Approval by the RRC does not (in itself) constitute permission to carry out the research, nor does RRC approval equate to official district sponsorship of the research activities. Schools are under no obligation to participate in a study that was initiated by outside researchers or other entities.

The RRC will evaluate proposals via the following criteria:

- A. Relevance: Degree to which the proposed research aligned to District strategic goals and priorities.
- B. Rigor: Degree to which the research methodology be expected to reveal valid and meaningful findings.
- C. Participant Risks/Benefits: Degree to which the research poses any potential risks to the emotional and/or physical health of human subjects, as well as yield meaningful benefits for study participants. (Except in exceptional circumstances, research proposals that involve the collection of student video recordings for study recruitment or data collection will not be approved. Additionally, any compensation for participation in research must be described in the application.)
- D. Burden: Degree to which the study imposes undue burden on subjects, schools or the District.

Approval of Research

If a research proposal is approved, the RRC will issue a research approval letter. The RRC's approval of a research proposal is limited to the study scope and methods outlined in the proposal. Following approval, researchers may approach principals for signatures on a cooperation form. Principals must agree to participate in the research project and sign the cooperation form for researchers to begin their work in schools. Each principal is ultimately responsible for the decision relative to the involvement of students, staff, or facilities under his or her direction. Principals may decide to appoint an appropriate designee at their schools to oversee research activities.

Upon completion of the research study, the researcher must send a letter to the RRC notifying the committee of completion of the study. A copy of the final report or summary of the results must be provided to the Research Review Committee, to the principal of the school at which the study took place, if applicable, and all District central office departments that provided a letter of support for the research proposal. Seattle Public Schools 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 Seattle Public Schools.

Approved: December 2017

Revised:

Cross Reference: School Board Policy No. 4280