

**A. Purpose**

The purpose of this Regulation is to establish guidelines for how research within Frederick County Public Schools (FCPS) is approved and conducted, and how results from research activities are disseminated and/or published.

**B. Background**

FCPS understands that research is important in evaluating the effectiveness of educational programs and initiatives, as well as providing information that contributes to the knowledge, development, and improvement of services provided to its students. FCPS recognizes that it may receive requests to conduct research within FCPS from individuals and/or agencies. It is the responsibility of the school system to ensure that research conducted in FCPS is of high quality; protects the anonymity and/or confidentiality of participants; poses the least impact on instructional time; does not pose undue burden on staff, students, and/or parents; and supports the goals/objectives of FCPS. Therefore, anyone wishing to conduct independent, internal or external research within FCPS must receive permission through the process outlined below in this Regulation.

**C. Definitions**

1. “Action Research” is defined to mean research that is conducted within schools and/or classrooms by administrators, teachers, interns, and/or other school system staff that provides diagnostic information that aids in improving, refining, and/or reflecting on academic, instructional, or organizational strategies.
2. “Anonymity” is defined to mean an assurance that research participants are not identified and/or are not linked to data.
3. “Confidentiality” is defined to mean an assurance that the identity of and information about all research participants must be kept confidential (or private) and in compliance with laws protecting privacy, including the Family Educational Rights and Privacy Act (FERPA).
4. “Data Collection” is defined to mean the process used in a research study that may include, but is not limited to, quantitative or qualitative data collection methods such as surveys/questionnaires, interviews or focus groups, observations, document analysis, tests/assessments, and/or inventories or scales.
5. “Personally Identifiable Information” (PII) is defined to mean information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. For example, PII may include the name of a student; an individual’s Social Security number; driver’s license or state ID numbers; passport numbers, financial account numbers, and

biometric identifiers. In combination, PII may include: the name of a student's parent, guardian or other family member, a list of personal characteristics which would make it possible to identify the student with reasonable certainty, a student's assigned identification number, home email, home address, personal telephone number, citizenship or immigration status, medical information, last 4 digits of the Social Security number, date of birth and/or mother's maiden name. These examples are neither comprehensive nor complete, and each instance must be evaluated individually.

6. "Student Personally Identifiable Information" (SPII) is defined to mean information that alone, or in combination, makes it possible to identify an individual student with reasonable certainty. The term includes, but is not limited to:
  - a. The student's name;
  - b. The name of the student's parent or other family members;
  - c. The address of the student or student's family;
  - d. A personal identifier, such as the student's social security number, student number, or biometric record;
  - e. Other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name;
  - f. Other information that alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty;
  - g. Information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates.
7. "Research" is defined to mean a systematic structure of investigation, evaluation, or measurement activities involving students, parents or staff members. Research studies can include the collection of new data or analysis of postsecondary or archival data.
8. "Sound Research" is defined to mean research that includes data collection and analysis methods that are clearly described and ensure that that research question(s) can be answered, use of valid and /or reliable methods, findings that can be generalized and/or limitations of research are disclosed, description of data privacy and security methods, including consent and/or assent forms when needed, and disclosure of any conflicts of interests with the research study.

#### **D. Procedures**

1. Any person or group wishing to conduct a research study in FCPS shall complete and submit the [Application to Conduct Research Form](#) via electronic means to the coordinator of data analysis and research in the System Accountability and School Accountability (SASA) department.
  - a. **Studies Requiring an Application (Typically Considered for Approval).** Research conducted by, but not limited to, the following:
    - i. Federal, state, or local agencies, national study groups, for-profit and non-profit organizations.

- ii. FCPS employees conducting research for coursework, master's theses, or doctoral dissertations.
    - iii. Non-FCPS employees conducting research for doctoral dissertation coursework.
    - iv. FCPS students wanting to conduct research that is not part of their classroom assignments and/or research that will be shared beyond FCPS.
  - b. **Pre-Approved Studies (No Application Required)**
    - i. Studies undertaken at the direction of the Board of Education of Frederick County (Board) and/or the Superintendent.
    - ii. Studies mandated by the Maryland State Department of Education (MSDE) or the United States Department of Education (USDE).
    - iii. School-initiated action research projects approved by the school principal or designee.
    - iv. Senior projects or informal surveys conducted at the school that are approved by the principal.
    - v. Sole use of publicly available data obtained from public sources, such as Maryland Report Card, MSDE, FCPS web site, etc.
  - c. **Excluded Research (Will Not Be Approved)**
    - i. Clinical research involving medication, drugs, or collection of biospecimens.
    - ii. Undergraduate thesis research.
    - iii. Master degree studies research by individuals who are non-FCPS employees.
    - iv. Research studies concerning the "protected areas" outlined in FCPS [Regulation 400-67, Student Surveys – Protection of Student Rights](#).
    - v. Research studies from non-FCPS students.
    - vi. Any individual or agency wishing to distribute materials (e.g., flyers, brochures) within schools to announce community-wide research opportunities for students, staff, or families. These requests should be submitted in accordance with FCPS [Regulation 513-01, Distribution of Informational Materials](#) (formerly 400-30).
2. **Institutional Review Board (IRB) Approval.** Research that is part of a degree requirement must have the approval of the college or institution (i.e., IRB approval) before submitting the [Application to Conduct Research Form](#).
3. **Application Review Process.** Following receipt of the [Application to Conduct Research Form](#), the Coordinator of Data Analysis and research shall designate a committee (or appropriate staff) to review the merits of the study and recommend whether or not permission shall be granted based on the following criteria:
- a. Submission of application and all supporting materials;
  - b. Relevance of the research study to the current needs and interests of FCPS;
  - c. Technical soundness/quality of the research study;
  - d. Qualifications of the researcher;
  - e. Impact on the instructional day;
  - f. Impact on staff time;
  - g. Availability of data being requested;
  - h. Safeguards of research participants;
  - i. Right of privacy of the student, parent and staff;
  - j. Parental consent where appropriate;

- k. Conflicts with state assessment programs; and
  - l. Compliance with Board policies, and FCPS regulations and procedures.
4. **Timeline.** Any person requesting to conduct research in FCPS must submit a copy of the application and supporting documentation/materials to the coordinator of data analysis and research a **minimum of 6 weeks** prior to the desired starting time of such project. It should be understood that this is an application and does not constitute approval of the research.
5. **Data Access Restrictions.** Researchers are not permitted to request data directly from FCPS schools or other FCPS departments without receiving approval.
6. **Participation.** Approval of research studies does not guarantee access to schools, staff, or students. It is at the discretion of the school administrator to decide whether their school will participate in the research study. Participation in research studies, unless federally or state mandated, are voluntary. Once approved, researchers are held responsible for obtaining required consent and/or assent from school administrators, staff, students, and/or parents.
7. **Modifications and Extensions**
- a. Any significant changes in research design (e.g., additional data collection, changes in targeted populations, etc.) must be resubmitted for further review and approval.
  - b. If research is not completed within an approved time period, then the researcher will need to be approved for an extension.
8. **Gifts and Monetary Incentives for Participation in Research**
- a. **Employees**
    - i. FCPS employees offered a gift over \$20 for participation in research will need to ensure compliance with Board [Policy 305, Conflict of Interests and Employee Ethics](#), prior to acceptance.
    - ii. Offering FCPS employees financial or monetary incentives for participation in research is permitted if participation is not in the interest of a business entity, outside employment, or personal research affiliation. FCPS employees may be paid for research completed outside of the professional workday; however, compensation may be no greater than the current hourly rate of workshop pay unless otherwise approved by the Director of Assessment, Data Reporting, and Strategic Improvement within the SASA department. FCPS employees receiving financial or monetary incentives for participating in research are required to submit an annual financial disclosure form.
  - b. **Students.** Monetary incentives (e.g., cash, gift cards) for student participation in research are not permitted. Students may receive small tokens (e.g., stickers, notebooks, food coupons) for participation in research or a monetary donation can be made to the school's student activities fund. Monetary donations must also comply with FCPS [Regulation 426-02, Donations and Gifts](#) (formerly 200-33).
9. **Confidentiality and Data Security Requirements**
- a. Research records and materials must be properly secured and stored to prevent

- unauthorized access, use, modification, or disclosure.
- b. Applicants may not share information about research participants, schools, or the district with third parties, except when additional approval has been granted.
- c. Any breach of data security and confidentiality regarding the research should be communicated with the coordinator of data analysis and research.
- d. Research records should be destroyed upon termination of the project.

#### **10. Dissemination of Research Results**

- a. Identifiers must be removed from datasets and dissemination of results must be at an aggregate level.
- b. FCPS' name, school name, or affiliation of research participants will not be used in dissemination and/or publication of research findings/results. Instead, descriptors such as school system in Western Maryland, may be used.
- c. Upon completion of research, researchers are asked to share findings (and/or any resulting publications) with the coordinator of data analysis and research.

### **E. Related Information**

#### **1. Board Policy**

- a. [Policy 208, Data Security](#)
- b. [Policy 305, Conflict of Interests and Employee Ethics](#)
- c. [Policy 404, Student Rights and Responsibilities](#)
- d. [Policy 421, Student Education Records](#)
- e. [Policy 442, Student Data Privacy](#)

#### **2. Code of Maryland Regulations (COMAR)**

- a. [COMAR 13A.08.02, Student Records](#)

#### **3. FCPS Regulations**

- a. [Regulation 200-42, Maryland Public Information Act Requests](#)
- b. [Regulation 400-20, Student Records](#)
- c. [Regulation 400-67, Student Surveys – Protection of Student Rights](#)
- d. [Regulation 400-96, Student Data Privacy](#)
- e. [Regulation 426-02, Donations and Gifts](#) (formerly 200-33)
- f. [Regulation 513-01, Distribution of Informational Materials](#) (formerly 400-30)

#### **4. FCPS Resources**

- a. [Application to Conduct Research Form](#)
- b. [Research and Data Requests Webpage](#)
- c. [Student Code of Conduct](#)

#### **5. Federal Law**

- a. Family Educational Rights and Privacy Act (FERPA)
- b. Protection of Pupil Rights Amendment (PPRA)

### **F. Regulation History** (Maintained by Legal Services)

<i>Responsible Office</i>	Department of System Accountability and School Administration
Adoption Dates	09/02/91
Review Dates	
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