

**Protecting people who participate in research**

*CITI Training Study Guide*  
**Research in Public Schools**

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**Special Rules that Govern Research in Schools - FERPA**

- FERPA (Family Educational Rights and Privacy Act) -  
gives parents certain rights over the content of their children's educational records.

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**Special Rules that Govern Research in Schools - FERPA**

FERPA rights transfer to students, or former students, once they're  
18  
or attending a post-secondary school (such as FPCC).

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**Special Rules that Govern Research in Schools - FERPA**

- Under FERPA, schools must generally have written permission from the parent, or eligible student (at least 18 or attending college), before releasing any identifiable information from a student's record.
- Such information might include: religious affiliation, citizenship, gender, ethnicity, disciplinary status, attendance, grades/exam scores, test scores, and progress reports.

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**Special Rules that Govern Research in Schools - PPRA**

- The Protection of Pupil Rights Amendment (PPRA), amended by the "No Child Left Behind Act" of 2001 -  
provides for parental control over the content of surveys, instructional materials, analyses, and evaluations of minor students.

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**Special Rules that Govern Research in Schools - PPRA**

Any research conducted on eight sensitive topics must obtain parental permission:

1. Political affiliations or beliefs
2. Psychological problems (of student or student's family)
3. Sexual behavior or attitudes
4. Illegal, anti-social or demeaning behavior
5. Evaluation of family members
6. Privileged relationships (e.g. with lawyers, doctors or ministers)
7. Religious practices or beliefs
8. Income (unless required by law to determine program eligibility)

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**Special Rules that Govern Research in Schools - DHHS**

Subpart D of the federal regulations, "Additional DHHS Provisions for Children Involved as Subjects in Research" requires full IRB attention to:

- Surveys
- Interviews
- Observation of public behavior when the researcher is participating in the activities being observed.

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**Special Rules that Govern Research in Schools - DHHS**

Subpart D allows "Exempt" status for:

- Research about normal educational practices, such as comparing instructional techniques, curricula or classroom management methods;
- Use of educational tests;
- Observation of public behavior when the researcher is NOT participating in the activities being observed;
- Use of aggregated, publicly available records.

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**Special Rules that Govern Research in Schools - DHHS**

In general, both parental permission and child assent must be obtained for students to participate in NON-exempt research.

The IRB may waive parental permission if:

- Risk to student is no more than "minimal" (no different from daily school experience);
- Waiver would not contradict FERPA or PPRA;
- The research is "impracticable" without the waiver; AND
- Parents are informed.

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**Special Rules that Govern Research in Schools – Child Assent**

The IRB may waive the requirement for a child's assent to participate in research IF:

- The child's capability is so limited that they cannot reasonably be consulted;
- The research will directly benefit the child and the benefit is only available through the research; OR
- The research meets the requirements for waiver of informed consent by adults (see "Informed Consent" chapter, pages 4-5 of the study guide).

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**Special Cautions with Child Assent**

Researchers should demonstrate how they will take extra care so that the child does not feel pressured to participate, for example:

- Reassurance that the teacher(s) or administrator(s) will not be mad at them.
- Privacy in the decision for adolescents who may be vulnerable to peer pressure.

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**Special Cautions with Children**

- Researchers must be aware of local and state reporting requirements and meet those requirements if they suspect abuse or neglect.
- If the research topic might be expected to reveal abuse or neglect, parents and older children must be informed that confidentiality may be limited by reporting requirements.

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