Institutional Review Board Policy

Action research, inquiry projects, and other forms of applied assignments within Reach Programs are specifically intended to fall into the “exempt category” and to therefore not require Institutional Review Board approval.

Background Information:

The Code of Federal Regulations, Title 45 CFR Part 46, identifies several different categories of minimal risk research as being exempt from Federal Policy for the Protection of Human Research Subjects.

Prior scientific review by the Institutional Review Board committee\(^1\) is not required for research that fall within the exempt category.

IRB reviewers do not actually approve an exempt study but instead make a determination that the project meets at least one of the federal exempt categories criteria.

Basic Exempt Criteria for Educational Strategies, Curricula or Classroom Management Methods, 45 CFR 46.101(b)(1)

- Research takes place in established or commonly accepted educational setting
- Involves study of normal educational practices (e.g., regular and special education instructional strategies; studies effectiveness or comparison among instructional techniques, curricula, or classroom management methods)

Additional General Requirements or Considerations

- When children are studied in school or other institutional settings, approval from relevant school official (including the school system IRB or research review committee, if available) must be attached to this application at the time it is submitted to Reach. Typically, studies of teacher pedagogy do not include children as the subject of the study, even if student data is used to evaluate the pedagogical practices in question.
- If children are studied, investigators must provide a rationale for why a particular age range was selected, indicate their expertise in working with children.

Normal Educational Practices Considered Exempt from Full Committee Review May include data sources such as:

- Students' curriculum-related written work, test scores, grades, artwork and other work samples produced by children

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\(^{1}\)The Reach Institutional Review Board consists of the members of the Academic Committee, and the operating rules for the two committees are the same.
Students' curriculum-related oral and non-verbal communicative responses individually, such as in an interview, in small groups and with the whole class

Students' responses (written, oral or behavioral) to curriculum-related activities

Students' level of active participation in curriculum-related activities

"A normal educational setting" means preschool, elementary, secondary, and higher educational facilities, and after-school programs (if the project relates to tutoring, or homework help.)

In Special Education, normal educational practices correspond to the Individualized Educational Program (IEP), which is tailored to each student with an identified disability and may be implemented in diverse settings (e.g., school, home, work, community).

Data collection methods in exempt settings might include:

- Videotapes and photographs of curriculum-related classroom activities audio tapes of teacher-student and student-student discourse related to the assignment
- Teacher's non-participant observation of curriculum-related activity of individual children or groups of children, noting what will be observed and how it will be analyzed, or whether it will be used as anecdotal evidence in the study
- Teacher's commentary on students' curriculum-related written work, artwork and other artifacts produced by children
- Student journals and communication books related to the curriculum
- Student grades and test scores
- Teacher journals, notes and reflective comments on student responses and participation in curriculum-related activities
- Questionnaires or interviews with students, parents and family members, teachers and administrators
- Non-participant classroom observations by colleagues, with the class teacher's permission, stating what will be observed and how it will be used, i.e. how data will be analyzed or whether it will be used as anecdotal evidence.

Policy:

- Two members of the Reach IRB committee must determine that a study, inquiry project, or other applied assignment is exempt. For inquiry projects included in the regular curriculum, IRB committee members may determine that the project or requirement are exempt generally (as opposed to approving each student application of that project).
- For Action Research projects (as opposed to regularly assigned applied practicums) students must complete and submit, for review by two IRB committee members, the following:
  - The research proposal (including information about who will participate in the study, the educational sites where the research will be conducted and why, whether and how children will be studied, how participants will be selected for participation, methods used including instruments, and how data will be analyzed).
  - “Confirmation of Exempt Research” worksheet
  - A sample of the Informed Consent Letter participants will sign
  - A letter approving research from the site principal or equivalent
  - If identifiable student information will be included in the published material, a sample of the Informed Consent Letter that will be signed by the parent (if under 18 years of age) or the student providing permission. Schools may have on file a general letter for students meeting this requirement, and if so a generic copy of this letter may be included
If any reviewing member of Reach IRB committee concludes that the research is not exempt, then the study will be recommended for a review by the IRB committee prior to approval.
SAMPLE INFORMED CONSENT LETTER

Principal Investigator: [NAME]

Research Study: [TITLE].

Dear Participant,

The following information is provided for you to decide whether you wish to participate in this research study. You are free to decide not to participate or to withdrawal at any time without adverse affects.

The purpose of this study is to [INCLUDE A ONE TO TWO SENTENCE DESCRIPTION ABOUT THE PURPOSE OF YOUR STUDY]. This study will be an action research study involving participants [DESCRIBE THE SETTING] and will be an examination of practices that are a part of your regular work.

Data collection will include [DESCRIPTION OF WHAT DATA WILL BE COLLECTED].

The collected data will be kept in on a secure, password protected computer and/or in a locked file cabinet. This data may be kept for continued research purposes, but will not be viewed by anyone other than the principal investigator and the research team for this study.

Do not hesitate to ask any questions about the study either before participating or during the time that you are participating. I would be happy to share our findings with you after the research is completed. Although the results of this study may be published, your name and other personal identifying characteristics will be changed. However, some contextual information pertinent to the study may be used (such as information about the school, the grade levels, and/or subject matter necessary for understanding the study). While your participation in and the results of this study are not associated in any way with your employment or evaluation of your job performance, the results of the study, with the protections described above, will be public and may be read by school supervisors.

There are no known risks/or discomforts associated with this study. The expected benefits associated with your participation include an expanded understanding of [DESCRIBE WHAT YOU HOPE TO LEARN], as well as [DESCRIBE HOW THEY MIGHT PERSONALLY BENEFIT FROM PARTICIPATION].

Please sign your consent with full knowledge of the nature and purpose of the procedures. A copy of this consent form will be given to you for your records.

Name of Participant __________________________ Signature of Participant __________________________ Date __________________________

[NAME], Principal Investigator
Phone: __________________________
Email: __________________________
Dear Parents,

This year I am doing an action research project on the use of writing frames to teach the narrative writing process. I am involved in action research to continue to improve my teaching practices and provide the students with sound teaching practices.

I will be focusing my project on a targeted group of fourth grade students. I will meet with them twice a week, 45 minutes each time, to give them additional instruction on writing strategies.

I will be collecting work samples, student surveys, and other data throughout the project. ASSURANCES: Students will remain anonymous in my written report and any work samples used will not included their real names or identifying information.

If you have any questions regarding my action research project, feel free to contact me. If you do not wish for your child to be included in my research, I will still assist them in the writing process.

Sincerely,

[NAME]

Phone:  
Email:  

Student’s name:  

Parent’s signature:  

My child can participate in this research project

☐ Yes
☐ No
SAMPLE PRINCIPAL OR EQUIVALENT PERMISSION LETTER

SCHOOL LETTERHEAD

[DATE]

Principal Investigator:

Topic of Study:

I have communicated with the above-named researcher regarding their research proposal. I hereby give my permission to conduct the research as proposed in my school(s).

Sincerely,

[PRINCIPAL NAME]

Signature of Principal or Equivalent

Date