RESEARCH, SURVEY AND DATA REQUEST MANAGEMENT

The Board of Directors welcomes the opportunity to partner with individuals and organizations to conduct in-District research and surveys and to fulfill data requests that are consistent with the Strategic Plan, benchmark goals and the best interests of District students. Every year, the District receives multiple proposals for such projects. Limited district resources prevent approval of all proposals, even if they meet the above criteria. The purpose of this policy is to implement a process to prioritize such projects and to manage them effectively.

Data, Assessment and Research Team (DART)
In order to prioritize, plan for and appropriately partner on research, survey and data requests, the District’s Data, Assessment and Research Team (DART) will implement a robust application and project maintenance system with five goals:

1) Establish a consistent, fair and rigorous application process;
2) Protect student and staff data in accordance with the law;
3) Identify the project’s measurable benefit to District students;
4) Manage expenditure of staff time and resources; and
5) Minimize interruption to students, employees, parents and district operations.

Institutional Review Board process
The District expects that all research and survey proposals will be designed to protect the dignity and confidentiality of all participants. Proposals for federally or state-funded research projects or surveys that involve human subject testing as defined by 45 CFR, Part 46 will be required to obtain Institutional Review Board (IRB) approval required by law prior to submitting their application to the District. Such approval must include notice and consent form language. The applicant will be responsible for costs of translation of notice and consent forms to languages that parents/guardians of participating students can understand. Costs for IRB review and approval are the responsibility of the applicant and will not be reimbursed by the District.

Applicants proposing non-federally or state-funded research projects or surveys involving human subject testing may choose to avail themselves of the IRB process prior to submitting their application to the District. Costs for IRB review and approval are the responsibility of the applicant and will not be reimbursed by the District. The District reserves the right to consider both whether an IRB process was used and, if so, the type of IRB used in its decision to approve or deny the project.

Review Committee
DART will establish consistent, fair and rigorous criteria for review of project applications and data requests, and convene a Review Committee three times per year to review and then approve or deny each application, generally within thirty (30) days. The Review Committee will consist of representatives from several District departments with expertise that DART deems relevant to the overall review process. DART will take reasonable steps to determine that no member of the Review Committee has a conflict of interest with regard to any project they review. DART will
notify each applicant of the committee’s approval or denial in writing within five (5) working days of the committee’s decision.

**Project Lead**
Upon approval of a research or survey project by the Review Committee, the Superintendent or designee will appoint a Project Lead within the appropriate department to serve as a point of contact between the researcher and all other departments, schools or programs that will be impacted by the project. The Project Lead will be responsible for supervising the development and execution of MOUs and DSAs, confirming that fingerprint checks have been completed, and monitoring the project to keep all relevant District administrators apprised as to status and the parties’ compliance with the MOU and/or DSA.

**General Requirements**
All research and survey projects will be required to comply with the Family Education Rights and Privacy Act (FERPA), the Protection of Pupil Rights Amendment (PPRA), state statutes and regulations, and all applicable District policies and procedures. Upon approval, each project will require a Memorandum of Understanding (MOU) between the researcher and the District that articulates the project’s benefit to District students. A Data Sharing Agreement (DSA) between the researcher and the District will be required if the project involves use of personally identifiable student data. Each data request independent of an approved research or survey project or an MOU between the District and a community partner will require a Data Sharing Agreement (DSA).

In compliance with Policy 3232, Parent and Student Rights in Administration of Surveys, Analysis or Evaluation, all research and survey projects seeking protected information, regardless of funding, will require that parents/guardians receive notice of the project and an opportunity to opt their student out (“active consent”). Applicants whose projects are approved will be required to pay all costs of translation of notice and active consent forms into languages that participating parents/guardians can understand.

No research or survey project may commence and no personally identifiable student data may be provided by the District until DART has: 1) notified the researcher or requestor that the application has been approved; and 2) received the executed MOU and/or DSA. Projects that are likely to consume a significant amount of district resources may be charged a processing fee to offset district expense.

DART will oversee and maintain effective internal controls throughout each project to protect staff/student privacy and data integrity. At the completion of each research project or survey and prior to publication of the project or survey in whole or in part, the researcher/requestor or organization will provide a final report of findings to the District. DART will manage and archive application records and final reports.

The Superintendent is authorized to implement regulations in accordance with this policy.

Legal References:  20 U.S.C. § 1232g Family Education Rights and Privacy Act  
CFR 45, Part 99 Family Education Rights and Privacy Act Regulations
20 U.S.C. § 1232h Protection of Pupil Rights Amendment
CFR 34, Part 98 Protection of Pupil Rights Amendment Regulations
CFR 45, Part 46
Chapter 28A.604, RCW, Student User Privacy in Education Rights Act
Chapter 28A.605.030, RCW, Student education records – Parental review –
Release of records – Procedure.
Chapter 388-04, WAC Protection of human research subjects

Cross References: Policy 3231, Student Records
Policy 3232, Parent and Student Rights in Administration of Surveys,
Analysis or Evaluation

Adopted: 11/19/18

Revised: