Process and Timeline

Despite not being an Institutional Review Board governed by the U.S. Department of Health and Human Services’ Office for Human Research Protections (OHRP), many of the CMS Office of Accountability research policies align with OHRP’s federal regulations, found [here](#). The CMS research review panel performs a review of proposed research for ethical conduct with the goal of protecting human subjects, but also ensures that proposed research aligns with district goals, as outlined in the [Strategic Plan 2018](#).

The CMS Office of Accountability [Outside Research Projects](#) web page includes a link to download the research application form and also includes more information on the application process.

From the time that the research application is submitted, expect the review process to take a minimum of 2-3 weeks. A panel of reviewers will be assigned to examine your research application and will almost always ask questions that should be clarified before the approval process can move forward. You will be emailed a list of questions/comments. You may respond directly to the email or you may update your research application in response to the comments by using Track Changes and then re-submit the application. There may be additional rounds of questions based on the responses to the initial questions. Do not worry – this is standard practice! Once the panel of reviewers has made a decision on your study, you will receive an email from Susie Freije with a letter of approval/denial. You will also receive a Memorandum of Understanding (MOU) that is created by CMS Accountability and has been signed by the Chief Accountability Officer. You should sign the MOU and return a copy of the entire document to Susie Freije. The MOU will outline exactly which data will be shared with you by Accountability; please be very clear in your application about the data requirements of your project so that you are able to request the information that you need. Once you have signed and returned the MOU, you are able to begin conducting your research study.

Data Collection

**CMS school staff cannot provide demographic** (e.g., address, race/ethnicity, LEP status, EC status, etc.), **attendance, discipline, or testing information on individual students**; all data should be requested from Accountability. This is done to: (1) save schools from being over-burdened by requests for data that Accountability can easily provide; and (2) ensure that researchers get accurate information that can be verified. This means that school staff **cannot retrieve data from the CMS Portals or other sources for research purposes**.

However, some student information requires prior parental consent before it can be released if it is identifiable (e.g., student birth date, address). Similarly, to receive identifiable teacher data, (e.g., EVAAS growth scores), teacher consent is required.

**Research cannot take place in the school where the researcher is currently employed.**

Data should be collected from a minimum of three schools to maximize the value and generalizability of the study. Each school’s principal should submit a preliminary letter of support (although principals cannot officially sign on to support your study until you have Accountability approval), to be included with the submission of your research application.

**Participation expectations**

Expectations for participants should be clearly identified for each type of participant (student, parent, teacher, etc.) and should include the time commitment (e.g., number of hours per session or data collection/training activity; number of months during which data will be collected) for each type of participant who receives a consent form.

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**Data requests**

If data is required that will not be collected as part of the study, once the research study is approved, a [data request](#) can be submitted to CMS Accountability.

**Recruitment**

School staff cannot offer referrals for specific students/staff to participate. Recruitment can be school-wide (e.g., the researcher may distribute a letter to all students or staff), and in some instances, can target sub-groups. If, for example, only male teachers or students in self-contained classrooms are necessary participants, it would be allowable to make the announcement only to those groups. Staff can be recruited, for example, by posting fliers in common spaces (e.g., the teachers’ lounge) or in their mailboxes with information on how to contact the researcher if they are interested in participating.

**Consent and assent forms**

Participants should consent to each activity of the study separately. In particular, consent and assent to videotape should have separate check box and signature lines on the consent and assent forms (something like this):

- I consent to my child’s participation in the science activity:  
  - [ ] Yes  
  - [ ] No

- I consent to the use of videotape during the science activity:  
  - [ ] Yes  
  - [ ] No

- I consent to my child’s participation in the baseline and follow-up questionnaires.  
  - [ ] Yes  
  - [ ] No

_________________________   _________________  
Parent/Guardian Signature   Date

**Anonymity and Confidentiality**

Please be aware of the difference between anonymity and confidentiality and be clear about which you expect to guarantee in your study. It is extremely critical that confidential information of students and staff is not disclosed. We expect a plan to address confidentiality to be described in the research proposal application.

**Data Security and Disposal Plan**

While data security and data disposal plans haven’t been explicitly requested in the previous version of the research application, they will be included in the next version. However, in cases where it is not clear that the data will be stored and disposed of properly, researchers have been asked to describe their data security and disposal plan.

Of note, federal regulations suggest storing data for a minimum of three years and then disposing of it: Research data must be archived for the longer of (i) three years after the final project close-out or (ii) five years after the final reporting or publication of a project, with original data retained wherever possible. Sponsored research grants, contracts, and cooperative agreements may mandate different retention periods (including state and local sponsors which generally require retention for six years following final project close-out).

**Surveys and Interviews**

It is our aim to not over-burden school staff with data collection requests. Therefore, we do not typically allow large-scale (i.e., greater than 250 participants) surveys or surveys/interviews/focus groups that last longer than 45 minutes.

*Updated August 2014*