

Guidance for Enrolling K-12 Students as Research Subjects

In some research situations, use of students is integral to a research protocol. This is particularly true of research into teaching methods, curricula and other areas related to the scholarship of teaching and learning.

An underlying principle of the regulations governing use of human subjects in research is that the subject's participation is voluntary and based upon full and accurate information. The student-teacher relationship raises the issue of volunteer participation. Students may volunteer to participate in the belief that doing so will place them in a favorable situation (e.g., better grade, good recommendation, employment possibilities), or that failure to participate will negatively affect their relationship with the investigator or teacher (e.g. lower grade, less favorable recommendation, being "uncooperative" and not part of the scientific community).

Care should be taken to eliminate or reduce the risk that undue influence of faculty or coercion affects student participation in research. The following guidelines are offered to assist faculty who engage in research projects in which students will be asked to be research subjects:

- A principal investigator (PI) must acquire a letter of support to conduct research from the Principal(s) of the school(s) where the research is to be done. If the district has a data research evaluation board (e.g., Fayette, Scott, Jessamine Counties), include a copy of the district approval or support letter along with those of the schools involved. See the [Off-Site Research webpage](#) for guidance on possible additional requirements from school districts. The letter(s) of support must be submitted to the IRB for review. If the district of school requires IRB approval before issuing its letter of support, please contact ORI for assistance.
- Research involving minors (under 18 years of age) as subjects requires a signed parental permission in most instances as well as assent from the student (age 6-11 verbal, age 12-17 written). Some types of research may qualify for Waiver of Parental permission. If a parental permission form is sent home with a potential student subject, an investigator contact telephone number should be provided on the form to enable parents to ask any questions that they may have for the investigator.
- Parental permission and assent procedures should be clear as to the activities that are part of the research. For example, a program of instruction that is presented to the entire class in a conventional manner is not a research activity (even if it is novel) and parental permission forms should not imply that they are. Student interviews or questionnaires administered to assess the program for research purposes are research activities for which parental permission and assent are sought. Individual student performance data that are part of the instruction can be included as research data only with explicit permission and assent for this additional use.
- An investigator may not invite participation of potential subjects by a letter that requires the subject to send back a postcard (or to telephone) only if he or she does **not** wish to participate. Subjects may become unwitting participants if, for example, they never receive the letter, don't read English, or are simply confused by the instructions. This approach also raises privacy concerns for certain types of research (e.g., research involving sexually transmitted diseases or psychiatric illness, or drug or alcohol abuse). The IRB only approves "passive" procedure if the federal criteria for waiving informed consent are met.
- When research activities to be done by the students are not part of the required class activities, the investigator should arrange to have the data collected by an independent third party, so that the investigator does not know who participated and does not have access to the identifiable data or identity of participants for any purpose until grades have been assigned and entered. For investigators using pre- and post- tests to determine efficacy of a particular curriculum, a colleague or third party should obtain the consent forms and distribute the tests when the investigator is not present (a graduate teaching assistant in the class in which the student/subject is enrolled does not qualify as a third party for collecting the data on behalf of

the teacher). If school personnel, for example teachers, are involved in the process of recruitment and obtaining parental permission, it may be necessary to list them as study personnel on the research and require them to take the human subjects protection training (please contact the ORI for further information and guidance in these circumstances).

- When extra credit is to be given to students who participate in research, students choosing not to participate in the research are to be given other options for extra credit, for example; short papers, special projects, book reports, and brief quizzes on additional readings, or completing a similar project. These projects should be comparable in terms of time, effort and educational benefit to participation as a research subject to ensure that students are not being coerced into becoming subjects. Alternatives offered to subjects need prior IRB approval.
- Solicitation of volunteer student subjects for research must be done in a non-coercive manner. To avoid undue influence, subjects should be recruited by a general announcement, central posting or announcement mechanism and should include a clearly written description of the project and a statement of the proposed student participation. In addition to being provided with the traditional information and consent forms, the student should also be provided with the name and contact information of a neutral third party to contact should they feel coerced at any time during the process.
- Whenever possible, researchers should avoid data collection during regular class meetings. When study participation consumes a significant portion of a class session, loss of instructional time for both participants and non-participants may be considered a loss of benefits. Also when research participation is expected during the same session at which participation is invited students may be unduly influenced to take part due to peer pressure, perceived stigmatization from non-participation, or a sense of having otherwise wasted time by attending that day's class.
- Since there are special risks of confidentiality in the close environment of the school, special attention should be given to full disclosure of these risks in the consenting of a student to participate. The plan for handling research data should also be designed to minimize the risk that confidentiality will be breached. When instruments call for the disclosure of information which participants may view as personal or sensitive, data should be collected in a manner that minimizes the chance of one participant learning the response of another.
- Students must be allowed to withdraw from the study at any time. The informed consent statement should make clear the consequences of withdrawing from a project prior to completion. In general it is favorable to give credit if the subject withdraws, unless the student withdraws immediately or there is evidence of bad faith on the part of the student.
- If the research project is one where data are collected from a group or perhaps a videotape of the group interaction, each student's consent is necessary for the use of that data in the instructor's research. If one student does not consent, the data may be used only if the non-consenting student's data can be effectively excluded.
- Students have the right to full disclosure as soon as possible. Whenever possible a teaching opportunity in the form of an "educational debriefing" should be employed. Students should know something about the rationale for the study, the process of data collection, and the intent of the researcher.

The following are additional regulatory requirements, beyond the basic IRB rules, that may apply to research conducted in the K-12 setting.

- Research supported by the US Department of Education (DoED) is subject to additional requirements and ethical standards. Refer to the Summary of Requirements for United States Department of Education (DoED) Supported Human Research for additional information.

- The Family Educational Rights and Privacy Act (FERPA) is a federal law that protects the privacy of personally identifiable information contained within a student's educational record. FERPA applies to all schools (K-12 including postsecondary institutions) that receive funds under various programs from the U.S. Department of Education. Generally investigators may not access classroom performance evaluations, grades, or information in a student's records without prior written permission from a parent or authorized legal representative, regardless of the access an investigator may have in his/her academic role. An investigator who is also an employee in the school system should be aware that he or she may have access to student records as an employee, but does not have the same access as a researcher. Refer to the [University of Kentucky \(UK\) FERPA Guidance](#) for guidance in complying with FERPA requirements when accessing educational records for research at UK. Investigators should contact each institution where research is going to take place and follow that institution's FERPA policy when accessing directory information.
- The Protection of Pupil Rights Amendment (PPRA) requirements apply to surveys of students which reveal protected information of a sensitive nature. PPRA outlines protections for DoED funded surveys as well as surveys conducted in institutions that receive funds from any program of the DoED. Protections include allowing parental inspection of survey materials and parental permission (consent), therefore PPRA impacts the determination of an IRB to waive elements of informed consent in order to allow 'passive consent'. Refer to the [UK PPRA Guidance](#) to ensure compliance with student survey research where applicable.
- The [Children's Online Privacy Protection Act](#) (COPPA) administered by the Federal Trade Commission may apply to K-12 research conducted using online mechanisms. If minors will be recruited or possibly in the recruitment pool, parental permission must be addressed. Researchers are prohibited from collecting personal information from a child without posting notices about how the information will be used and without getting verifiable parental consent.