

Guidance for Enrolling K-12 Students as Research Participants

An underlying principle of the regulations governing use of human subjects in research is that the research volunteer's **participation is voluntary and based upon full and accurate information**. The student-teacher relationship complicates the issue of volunteer participation in research.

For example, 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 they may perceive the 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).

Still, the use of students is integral to some research studies. This is particularly true of research regarding teaching methods, curricula, and other areas related to the scholarship of teaching and learning. Consequently, care should be taken to **eliminate or reduce the risk of undue influence or coercion** on research involving student participation.

The following guidelines are offered to assist researcher and faculty who engage in research studies in which students will be asked to be research participants:

Site Requirements:

- A principal investigator (PI) must acquire a **Letter of Support** from the principal of the school where the research is to be done before conducting research there.
- A Letter of Support must be submitted to the IRB for review. If the district of the school requires IRB approval before issuing a Letter of Support, please contact ORI for assistance. rs_ORI@uky.edu
- 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.

Non-UK Study Personnel:

- If non-UK school personnel, such as teachers or support staff, are assisting an investigator with their research, it may be necessary to list them as study personnel on the research protocol. For example, a teacher distributing and collecting parent permission forms is **engaged in research** and will need to be added as study personnel.
- If a non-UK teacher or support staff is acting as study personnel for a research project, they will need to sign an **Individual Investigator Agreement (IIA)**. The investigator should contact the [UK IRB Reliance Team](#) to determine whether Individual Investigator Agreements (IIAs) is required.
- A K-12 teacher or support staff acting as study personnel on a research project will also need to complete **Human Subject Protection (HSP) Training**. A [K-12 HSP Training Course](#) is available for non-UK teachers and support staff acting as study personnel for research in a K-12 classroom. The course satisfies the requirements for Human Subject Protection (HSP) training

for non-UK teachers and support staff. The **investigator conducting research in a K-12 classroom is responsible for notifying the Office of Research Integrity (ORI)** upon the course completion. The course completion certificate along with study personnel's name and email address should be emailed to HSPTrainingSupport@uky.edu.

Recruitment:

- Solicitation of student volunteers for research must be done in a **non-coercive manner**. To avoid undue influence, participants should be recruited by a general announcement or a central posting/announcement mechanism.
- Recruitment advertising should include a clearly written description of the research project and a statement of the proposed student participation. The description and statement should be presented at a **grade level appropriate** to the student population being recruited.
- Recruitment advertising should also include the **contact information of a neutral third party** to contact should a student feel coerced at any time during the recruitment process.
- An invitation to participate in a research study **should not require students or parents to send back a postcard or return a phone call if the student does not wish to participate**. Students may become unwitting participants. For example, parents might never receive the letter. Or they may not read English. Or they may simply be confused by the instructions.

Informed Consent:

- Research involving minors (under 18 years of age) 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 a Waiver of Parental Permission.
- If a parental permission form is sent home with a potential student participant, an **investigator contact information** should be provided on the form to enable parents to ask any questions that they may have for the investigator.
- Requiring potential participants or a parent of potential participants to return a postcard or telephone call to opt out of a research study is called **"passive" consent**. The IRB only approves passive consent if the federal criteria for waiving informed consent are met. Passive consent also raises privacy concerns for certain types of research (e.g., research involving sexually transmitted diseases or psychiatric illness, or drug or alcohol abuse).
- Activities that are part of the research should be **explained clearly** in the parental permission and during the assent procedures. For instance, administering student interviews or questionnaires to assess classroom curriculum for research purposes is considered a research activity for which parental permission and assent are sought.
- Students have the **right to full disclosure** as soon as possible and throughout the ongoing consent process. 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.

- Students must be **allowed to withdraw from the study** at any time. Any consequences for withdrawing from the research study prior to completion should be stated clearly with informed consent. In general, it is favorable to give credit if the participant withdraws, unless the student withdraws immediately or there is evidence of bad faith on the part of the student.
- Since there are **heightened confidentiality risks** in the closed environment of a classroom, special attention should be given to full disclosure of these risks with the consent of a student to participate in research.
- 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. However, individual student performance data that are part of the instruction can be included as research data with **explicit permission and assent for additional use of instructional data**.
- 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 **alternative 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 research subject to ensure that students are not being coerced into becoming subjects. Alternative options offered to students choosing not to participate in the research study **need prior IRB approval and should be noted during the consent process**.
- 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).

Data Collection:

- The plan for handling research data should be **designed to minimize the risk** that confidentiality will be breached. For example, 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.
- 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.
- Whenever possible, researchers should **avoid data collection during regular class meetings**. When study participation consumes a significant portion of a class section, 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.

- If the research project is one where **data is collected from a group or 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.

Additional Consideration:

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 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 are 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.