Jefferson County Public Schools
Administrative Offices

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JCPS IRB COVID-19 Response Plan for Research and Data Sharıng

June 1, 2020

Dear Partners,

We wish you well during this uncertain time. We would like to share the JCPS IRB plan for review and approval of research and data sharing activities effective now through the 2020-21 school year. These expectations align with current public health guidelines, federal K-12 guidance on reopening, and plans of many other large urban school districts. We ask that you share this information broadly to ensure your staff can adjust any planned research with JCPS accordingly. We will share any changes to these guidelines as we know them.

Guidelines for All Researchers, Vendors, and JCPS Staff Pursuing Degrees

Along with other K-12 districts around the country, JCPS is planning for a 2020-21 reopening with measures that prioritize the health of our students and staff above all else. Schools must continue to be safe places for our children focused on their learning, and teachers must have the time to devote to evolving student needs. We will concentrate on activities that minimize risk to students while simultaneously protecting fragile learning time, JCPS staff job responsibilities, and health and wellness.

To that end, *all in-person data collection in JCPS schools is SUSPENDED INDEFINITELY throughout 2020-21*. We are also are restricting most research and data sharing activities for the 2020-21 school year including:

- new program implementation
- evaluation of existing programs
- virtual research and data collection on students (e.g., programs; surveys; interviews)
- faculty and graduate student research projects, including JCPS staff pursuing degrees.

No research activities can be conducted within JCPS without approval by the JCPS IRB *as the IRB of record for all JCPS schools*. We strongly recommend that current partners and new applicants contact the JCPS IRB to discuss plans before taking time to submit an application or making changes to approved methods. All decisions about whether JCPS can consider and continue projects will be made first by district leadership before the JCPS IRB can review to ensure JCPS is meeting the most recent State guidance. It is JCPS policy that researchers and vendors work through JCPS Central Office to secure approval for research and contracts before contacting schools.

Please review the following JCPS IRB guidelines.

Recommendations to University Faculty and Students (including JCPS staff pursuing degrees)

Published Data. As a first course of action, please consider designing research around questions that can be explored using published, aggregate data. JCPS publishes yearly and trend Data Reports and Research.

Data Sharing Requests. JCPS considers requests for unpublished aggregate data through the Open Records Request process managed by the Office of General Counsel. Please be aware that these requests take time to fulfill pending priority level relative to existing projects and complexities involved in pulling those data. Please also be aware that federal and State laws prevent JCPS and other K-12 districts from providing certain types of student data, especially if students potentially could be identified.

Virtual Learning Studies. As with the national and international education community, JCPS is interested in and concerned about the impact of online learning. We are studying evidence-based practices that can be scaled, and we are committed to improving this experience for students and families. We also recognize

the opportunity that this situation presents. However, we have decided to partner with and follow national models to avoid potential unintended consequences of multiple one-off virtual learning research requests. Thus, please anticipate that few requests will be approved to assess JCPS students' experience of virtual learning.

Application Timelines

Application deadline. 1st day of the convening month (e.g., September 1st). Applicants must have all required application materials completed by the 1st.

Review Schedule. The JCPS IRB will continue to consider applications on a quarterly basis in 2020-21 for requests first endorsed by the Superintendent. Specific dates may be subject to change, and we will update the convening dates and deadlines for applications on the JCPS IRB website.

| * Jun 11 | → | Sep 18 | → | Dec 18 | → | Mar 19 |

* No new requests will be accepted for June 11, 2020. The JCPS IRB will only review applications already submitted and continuing reviews with existing partners.

Approved Applications (before March 13, 2020)

Contact the JCPS IRB. Please reach out as soon as possible to discuss your options for Fall 2020. As noted under Guidelines, we do not currently anticipate allowing in-person visits to schools.

Consider a Plan B. If your primary methods involved onsite visits, we recommend that you consider whether you can adjust your timeline (2021-22) or address your research questions using existing data sources first. In some cases, data collection can be shifted to online, but we are trying to limit our students' additional exposure to screen time and the privacy risks that accompany virtual platforms. Please be aware that the use of third party platforms may require data sharing agreements and vendors must be on the JCPS IT approved list.

New Research Applications and Planned Continuing Reviews

Any research applications received between March 13th through May 26th are considered new. Partners with existing multi-year contracts and/or who would normally qualify for a continuing review by the JCPS IRB also are impacted by these Guidelines. Thus, we again encourage you to reach out to the JCPS IRB in advance to discuss whether JCPS can support your request this year. This also will allow us to determine whether your project requires additional agreements with JCPS, such as a Memorandum of Agreement (MOA) or Data Sharing Agreement (DSA).

You are welcome to review our application procedures at the following JCPS sites:

1. Please review the JCPS IRB site and the JCPS IRB Procedure Manual to ensure you understand our procedures and required documentation. We update any Guidelines here.

2. Visit our Data Request Management System (DRMS) platform, then click the link to *Create an Account* (approval takes approximately 48 hours). Once you receive confirmation of your account, you can login, request a dashboard, and select IRB (Research) to begin your JCPS IRB application.

We value your partnership, and we appreciate your support of our efforts to provide a safe, healthy environment for our students and employees. Please contact Dr. Leslie Taylor with further questions.

Sincerely,

Leslie R. Taylor

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