

JCPS IRB General Criteria and Conditions

Minimum Criteria for Initial Review by the JCPS IRB

- 1) Activities, programs, interventions, or technologies proposed directly support current districtwide initiatives and priorities as determined and endorsed by JCPS Chiefs or individual school Supervisors. As internal procedure, the JCPS IRB contacts the appropriate district leader with a summary of the study purpose and estimated alignment and impact (NOTE: If JCPS leadership does not support a proposed project, the JCPS IRB will not review it for approval);
- 2) The study complies with 45 CFR 46 Protection of Human Subjects as well as any other relevant federal laws the district is required to uphold; and,
- 3) The study complies with Kentucky state laws and regulations and Jefferson County Board of Education (JCBOE) policies, including the Racial Equity Policy.

Minimum Conditions for Approval by the JCPS IRB

The JCPS IRB requires the following evidences and documentation at minimum to gain approval.

- 1) Research activities must not exceed *minimal risk* as defined by the JCPS IRB ¹;
- 2) Research protocols must include informed consent forms for parents/guardians, and assent forms for students capable of providing, that meet requirements listed in the *JCPS IRB Informed Consent Checklist* which identifies standard elements of informed consent pursuant to 45 CFR 46 as well requirements of other education-related federal laws, Kentucky state laws, and JCBOE policies;
- 3) The JCPS IRB may grant conditional approval in cases where service contracts or data sharing agreements are pending approval by the Jefferson County Board of Education (JCBOE) to align research reviews with the additional legal requirements for public school districts; and,
- 4) The JCPS IRB must receive final documentation of approval from the institutional IRB with whom the researcher is affiliated as assurance that the institution has reviewed and supports the proposed activities. However, the JCPS IRB does not hold cooperative agreements with any other institutional IRBs; as such, the JCPS IRB serves as the IRB of record for any requests involving Jefferson County Public Schools.

¹ JCPS IRB Definitions of Risk Levels.

Minimal = not greater than that encountered in daily life or routine activities (45 CFR 46.102 (j)) for the average person and age-indexed (National Institutes of Health); consistent with current K-12 laws and JCPS policies and priorities; and/or, little to no loss of instructional time; age appropriate; does not disrupt or add to staff responsibilities.

Moderate = requires some disruption to daily activities; may not sufficiently differentiate for age/ability; exceeds scope of normal job responsibilities regarding tasks or time; may violate district responsibilities to uphold K-12 laws and JCPS policies.

High = substantial disruption; exposure to non-age appropriate activities; inconsistent or in conflict with current JCPS priorities; potential for re-traumatization; clear violation of laws or JCPS policies.