



Education, Master of Arts

Instructor's Approval of Exempt Class Research EDUC Graduate Student Action Research Only EDUC 680 & 693

Instructor's name: Click or tap here to enter text.

Instructor's email: Click or tap here to enter text.

Co-Instructor's name (if applicable): Click or tap here to enter text.

Co-Instructor's email (if applicable): Click or tap here to enter text.

Academic year of courses: Click or tap here to enter text.

Review A-G below. Check the boxes and submit this form to the HRC Chair via email IRB@western.edu. All boxes must be checked to approve the Exempt Class Research.

- A. I request that the EDUC Graduate student research for the above-mentioned class be categorized as "Exempt Research" and considered as one proposal.
- B. I verify that that all Graduate student projects under this exemption will be only be conducted within the academic year calendar dates.
- C. I verify and will provide documentation showing that all students wishing to engage in Human Subjects Research as part of the EDUC Master's program have taken and passed the required CITI training prior to engaging in research involving human participants.
- D. I verify that all EDUC Graduate student research covered by this exemption fits one or more of the following categories of Exempt Research.
- E. Studies that enroll children must consider a plan for obtaining minor assent for children ages 7-17 and parental permission/legal guardian permission through the appropriate consent form. I will require the Graduate students enrolled in this course to obtain minor assent and parental/legal guardian consent and obtain copies of forms to be submitted to the IRB Chair at IRB@western.edu prior to engaging in research involving human participants.
- F. Studies that are conducted at external institutions (e.g., public schools, agencies, private organizations, state or local community institutions, etc.) must include a Letter of Agreement signed by the principal or assistant principal. A Letter of Agreement template is provided on [HRC website with a special Letter of Agreement for the use of student data](#). I will require the Graduate students in this course to obtain and provide the Letter of Agreement to me. I will provide all signed Letter of Agreements to the IRB chair at IRB@western.edu prior to engaging in research involving human participants .
- G. I understand and agree with the policy that in the event a student research project falls outside the "exempt" status, the student will be required to apply individually for an Expedited or Full IRB review and approval prior to the start of their research.

Categories of Exempt Research

1. **Normal Education Practices***: Projects limited to activities involving normal educational practices in commonly accepted educational settings that are not likely to adversely impact students' opportunity to learn required educational content or the assessment of educators who provide instruction.
 - Normal educational practices are activities that could occur in the specific educational setting regardless of whether the research is conducted. This includes most research on regular and special education instructional strategies that normally occur in the classroom or that are considered "best practice." Examples include established teaching methods (not considered to be experimental), or studies of curriculum or teaching strategies, and commonly accepted classroom management techniques that are planned and implemented by the classroom teacher. No interventions are allowed.
 - Any study which requires that subjects be removed from their normal classroom situation for testing does not meet this category. If you have a Graduate student that intends to remove students from a normal classroom situation, you will need to submit either an Expedited or Full IRB application for separate review. Consult the Chair of the IRB at IRB@western.edu for clarification/questions.
 - The participants should include those involved in the educational experience, which most likely will include the teacher(s), student(s), and possibly the administrator(s). Participants that are indirectly involved in the educational experience may be included in the study, but they may not be exempt under normal educational practice, thus requiring additional consent procedures. For example, interviewing a principal may require that you use a consent form because this occurs outside the classroom and may not be considered normal educational practice.
 - Participants can include populations with special educational needs or non-English speakers, for example, though the IRB will require demonstration of the investigator's credentials to work with these vulnerable populations as well as clear explanation of any additional procedures to minimize risks specific to working with this population. For example, if a child is significantly cognitively delayed, obtaining assent may not be appropriate, and the investigator must describe what steps will be taken to ensure that appropriate cues are taken from the child that may indicate an unwillingness to continue with study procedures.

*Family Educational Rights and Privacy Act (FERPA): Research exempted as normal educational practice is often conducted in public school settings which may demand that specific steps be followed in order to comply with additional state and federal laws. FERPA restricts researchers' access to student records without written permission from parents. Researchers are responsible for complying with FERPA laws when accessing student education records for research purposes, including for the purpose of identifying and recruiting potential research participants and conducting secondary analysis of the records. Graduate students must contact the institution and follow that institution's FERPA policy to obtain consent for access to student data if it applies to the project under this exemption.

* Research that falls under the Protection of Pupil Rights Amendment (PPRA) is not exempt and does not meet this category – your Graduate student will to submit a Full IRB application to be reviewed by the Human Research Committee separately. PPRA outlines 8 categories of protected information for survey responses and requires that parents be afforded the right to inspect surveys before they are given to students. Please see the list of 8 categories of protected information on page 3.

2. **Educational Tests or Observation of Public Behavior***: Research that only includes interactions involving educational tests (cognitive, diagnostic, aptitude, achievement) or observation of public behavior (including visual or auditory recordings) fit within this exemption for studies that involve minors

only if the investigator (i.e., the Graduate student) does not participate in the activities being observed and data is recorded in a non-identifiable manner (i.e., cannot be readily linked back to human subjects). No interventions are allowed.

- Note, minors cannot participate in survey or interview procedures under this category – **if you plan to include any sort of questionnaire or survey administered to minors, and/or conduct a focus group or an interview of minors as part of your research, you must submit either an Expedited or Full IRB review of your project.** An Expedited or Full IRB application or separate review is also required for any study involving participatory observational data i.e., observational research with children that involves participation by the researcher(s). Consult the Chair of the IRB at IRB@western.edu for clarification/questions.

*FERPA restricts researchers' access to student records without written permission from parents. Investigators must contact each institution and follow that institution's FERPA policy.

* Research that falls under the PPRA is not exempt and does not meet this category – your Graduate student will need to submit a Full IRB application to be reviewed by the Human Research Committee separately. PPRA outlines 8 categories of protected information for survey responses and requires that parents be afforded the right to inspect surveys before they are given to students.

The eight categories of PPRA:

1. Political affiliations or beliefs of the student or the student's parent
 2. Mental or psychological problems potentially embarrassing to the student or their family
 3. Sex behavior or attitudes
 4. Attitudes toward race, religion, color, sex, or national origin
 5. Attitudes toward pregnancy, abortion, birth control, or sexual orientation
 6. Attitudes toward drugs, alcohol, or smoking
 7. Attitudes toward religion, occultic practices, or gambling
 8. Attitudes toward sex or sexual orientation, or sex education
-
3. Projects limited to the examination and analysis of existing data or specimens so long as these are publicly available (e.g., on CDE's website) and individual subjects will not be identified in any report of the research.

Please attach a list of the student names in the class covered by this request and the certificates of completion of CITI training.

Signature of the Instructor:

X
