Committee for External Research Review (CERR)

Interested in Conducting Research at LAUSD?

The **Committee for External Research Review** (CERR), led by the [Strategic Data and Evaluation Branch](https://www.lausd.org/domain/1370), reviews, approves, and monitors all research conducted in the Los Angeles Unified School District (LAUSD). If you are looking to conduct research inside LAUSD schools or plan on contacting anyone associated with the District (administrators, teachers, parents, students) as part of your research study or evaluation, you must submit a proposal to CERR for review and approval. If your research study or evaluation requires individual-level data (e.g., student or staff), you will be also required to submit a Data Use Agreement to the Data Privacy, Analysis, and Reporting Branch (DPAR) for review and approval. If you only need school- or district-level data, you will find a wide array of publicly-available information regarding the work of LAUSD and its impact on students, teachers, principals and parents in the LAUSD Open Data Portal: [http://opendata.lausd.net](http://opendata.lausd.net/)

Please be aware that the proposal and approval process can take several weeks to complete so CERR strongly encourages researchers to plan accordingly.

If you have any questions about CERR or the research proposal submission process, please email the **CERR Team****.**You can also call (213) 241-4100.

Research Proposal Submission Window

**No late submissions will be accepted.** Researchers who miss the submission window will be encouraged to apply during the next submission window which opens in October. CERR only processes District-sponsored research projects and projects conducted by LAUSD employees who are pursuing PhD, EdD, or master’s degrees outside of submission windows. For more information regarding late submission exceptions, please contact the **CERR Team** or call (213) 241-4100.

**Due to the difficulties experienced by our school and District communities, only those research projects found by program decision-makers to be of concrete and timely benefit to the District will be approved. CERR, in concert with program staff, will determine the benefit to the District proposed by the researcher(s).**

**In addition, please note that we are NOT accepting proposals from graduate students who wish to distribute and collect surveys. Graduate students may still submit proposals that focus on qualitative research and/or administrative data (quantitative).**

Submitting Research Proposals

LAUSD employees and external researchers who aim to conduct research in the District to fulfill their EdD or master’s program requirements should thoroughly review the LAUSD Research Guidelines webpage (below) and CERR approval process documents related to ***action research*** not standard CERR approval process documents. After researchers have reviewed all necessary materials, they should submit their application via the “Action Research Submission” link. **Note:** **LAUSD principals who aim to conduct research at their school site are encouraged to contact** **the****CERR Team** **to discuss participant recruitment strategies to prior to applying.**

All others who seek to conduct research in the District (including LAUSD employees or external researchers who are PhD candidates) should review the [LAUSD Research Guidelines](https://www.lausd.org/Page/18646) webpage and all documents related to the ***standard*** CERR approval process. Once applicants have reviewed all necessary documents, they should submit their application via the “Standard Research Submission” link, which is only available during the submission windows.

Proposals submitted during submission windows will go through an initial review within 15-30 working days from the date the submission window closes. However, approval requires program input so plan your research study period accordingly.

LAUSD Research Guidelines

Prior to submitting your research proposal, **it is important for the researcher to review all instructional or advisory guides described in detail in the LAUSD Research Guidelines as described below, including the ethical and legal principles of conducting research at LAUSD.**

 I. General Principles

Research conducted in LAUSD or with its resources must be justified in terms of the anticipated benefit to the District and not merely to the advancement of knowledge. LAUSD encourages research aligned with the 2022-2026 Strategic Plan: <https://sites.google.com/lausd.net/lausdstrategicplan/home>

Research should be designed to answer well-formed research questions of educational importance, and it should use methods that are appropriate to the research questions. Elements of the research design, including the theoretical framework, hypotheses, sample selection, instruments, and analysis plan should support the goals of the research, and it is the responsibility of the researcher to communicate these things clearly in the proposal. Even research that imposes no risks may be rejected by the review committee if they judge it to be poorly designed, described, or justified.

While LAUSD recognizes the value of high-quality research for improving education and serving the needs of future generations of students, the District staff have legal and ethical obligations that require oversight of research activities conducted with District resources (such as data, facilities, employee time, and access to students). These obligations include:

* Protecting students and employees from risk of harm, violations of rights, and losses of privacy
* Protecting the educational process from unwarranted distractions and interruptions
* Protecting public resources including data from misappropriation for private or unjustified use

**Due to the difficulties experienced by our school and District communities, we will be approving only a select few proposals from every submission window. Only those research projects found by program decision-makers to be of concrete and timely benefit to the District will be considered. CERR, in concert with program staff, will determine the benefit to the District proposed by the researcher(s).**

**In addition, please note that we are NOT accepting proposals from graduate students who wish to distribute and collect surveys. Graduate students may still submit proposals that focus on qualitative research and/or administrative data (quantitative).**

CERR approval does not impose any obligation on any person, school, or office to cooperate with researchers. Researchers bear responsibility to inform potential respondents of the anticipated benefits and burdens in obtaining their consent. Of course, no research may be conducted at a school site without the informed approval of the principal. Please be aware all data collection with staff (outside of observations) must take place outside of paid time and that staff should be apprised of this fact during recruitment. **All data collection with students (other than observations) must take place outside of instructional time.**

# Depending on the research design, substantial time and effort may be required for LAUSD staff to provide requested data with the appropriate selection and matching of records and concealment of personal identities. Upon approval of the submitted proposal, the researcher will receive an estimate of the time and anticipated costs associated with LAUSD providing requested data for the study.

II. Legal and Ethical Principles

**A. Legal Protections**

Although this committee does not function as an institutional review board (IRB), as a school district, we must require that all research within the District adhere to federal regulations regarding family and pupil rights, privacy, and protection. In addition, we must require that all research within the district adhere to federal guidelines regarding the protection of human subjects. Although we rely to an extent on approval from your organization's IRB to ensure you have taken all necessary steps to protect human subjects involved in your research, our own guidelines may go above and beyond those of your IRB. Therefore, each researcher should become familiar with these guidelines before submitting a proposal to our committee.

Federal Policy for the Protection of Human Subjects (34 CFR Part 97) This policy is found in the regulations of various departments, but the Department of Education version differs slightly from the DHHS version often cited by researchers and institutions. It can be found at <http://www.ed.gov/policy/fund/reg/humansub/part97.html>

One subsection in particular should be noted, Additional ED Protections for Children Involved as Subjects in Research: <http://www.ed.gov/print/policy/fund/reg/humansub/part97-3.html>

Note that research involving “normal educational practices” is exempt from IRB review under 34 CFR Part 97.101(b)(1). However, 34 CFR Part 97.101(b)(2) makes it clear that survey and interview procedures are not included in the definition of normal educational practices. For such procedures, what is required for exemption from IRB review is that information be recorded in a such a manner that human subjects cannot be identified, and that any disclosure outside of the research cannot reasonably be damaging to the subjects’ financial standing, employability, or reputation.

Because of the special relationship that schools have with students and their families, the Family Educational Rights and Privacy Act (FERPA: 34 CFR Part 99) and the Protection of Pupil Rights Amendment (PPRA: 34 CFR Part 98) impose stricter requirements on the District than those imposed on researchers by IRB review or its exemption. These rules may be found at

PDF:
<https://studentprivacy.ed.gov/sites/default/files/resource_document/file/2012-final-regs.pdf>

HTML:
<https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

Due to the possibility of FERPA violations due to increased numbers of students being schooled via Distance Education, it will also be important to study the following website: [https://studentprivacy.ed.gov](https://studentprivacy.ed.gov/) as it addresses virtual learning and human subjects protections.

Before research may begin in LAUSD, one of the following must be submitted to Committee on External Research Review:

* In the case of research subject to Institutional Review Board (IRB) review, the researcher must submit a copy of the IRB submission along with the LAUSD proposal and provide the Committee on External Research Review with a copy of the **IRB approval letter** before beginning research.
* In the case of research exempt from IRB review, the proposal must include documentation from the institution clearly delineating reasons for such an exemption.
* In the case of research not affiliated with any institution subject to IRB requirements, the researcher is encouraged to obtain an IRB from an external institution. The proposal must include persuasive evidence that the researcher has carefully considered the potential risk to human subjects, especially students and families, and has ensured the appropriate protections in the research design.

In accordance with our guidelines, please provide additional information to address the second and third bullets. The proposal should identify the protections relevant to working with students and student data. If the research involves contact with students other than normal educational practices, student and parent consent forms must be included. Note that even with parental consent, minors in school settings must be given the opportunity to assent or refuse to participate in research activities other than routine educational practices.

**B. Ethical Principles**

We expect researchers to abide by the code of ethics for their respective disciplines. As a general guideline, we offer the following principles. These principles have been adapted from the American Psychological Association’s (1992) Ethical Principles of Psychologists and Code of Conduct. The entire code is available at <http://www.apa.org/ethics/code.html>.

***Familiarity with Ethics Code.*** Researchers have an obligation to be familiar with applicable ethics codes and their application to research. Lack of awareness or misunderstanding of an ethical standard is not itself a defense to a charge of unethical conduct.

***Compliance with Law and Standards.*** Researchers plan and conduct research in a manner consistent with federal and state law and regulations, as well as professional standards governing the conduct of research, and particularly those standards governing research with human participants.

***Informed Consent to Research.*** Researchers use language that is reasonably understandable to research participants in obtaining their appropriate informed consent (except when consent is waivable). Such informed consent is appropriately documented. For persons who are legally incapable of giving informed consent, researchers nevertheless (1) provide an appropriate explanation, (2) obtain the participant's assent, and (3) obtain appropriate permission from a legally authorized person, if such substitute consent is permitted by law. Please review the External Research Consent Form Checklist document to ensure that your consent and assent forms adhere to District legal and procedural requirements for research.

***Minimizing Intrusions on Privacy.*** In order to minimize intrusions on privacy, researchers include in written and oral reports, consultations, and the like, only information germane to the purpose for which the communication is made. Researchers discuss confidential information obtained in schools, or evaluative data concerning students, teachers, and other research participants, only for appropriate scientific or professional purposes and only with persons who are clearly concerned with such matters and have pledged to uphold confidentiality.

# ***Compensating Research Participants.*** Incentives to participate in external research (e.g., donations, gift cards, or stipends) must adhere to LAUSD guidelines. For example, when compensating student or parent participants, compensation must be under $40 to avoid being coercive. To ensure plans to compensate participants – as defined in CERR proposal - adhere to District guidelines, review the following documents provided in the respective CERR Packages downloadable on the following webpages:

1. Guidelines for External Research Proposals with Incentives or Stipends for Participants
2. LAUSD Policy Bulletin 5895.2: Donations
3. LAUSD Reference Guide 055300: Tax Implications on Employee Receipt of Gift Cards, Tickets, and Other Fringe Benefits