![Teachers College IRB - Institutional Review Board logo]

New York City (NYC) Department of Education (DOE)
Institutional Review Board (IRB) Research Protocol Submission Guide
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NYC DOE IRB

TC IRB *does not* *have jurisdiction* over New York City (NYC) Department of Education (DOE) Institutional Review Board (IRB) or NYC DOE sites. However, Teachers College (TC) researchers who plan to engage the NYC DOE IRB can use this guide in support of their research work.

Researchers should consult the [NYC DOE IRB's website](#) or email IRB@schools.nyc.gov for the latest policy updates and submission guidelines.

Research at NYC DOE Sites

The NYC DOE is the largest school system in the nation with a diverse student population. TC researchers interested in working within an NYC DOE site **must first be approved** by TC's Institutional Review Board (IRB), and **then approved by** the NYC DOE IRB *prior* to participant recruitment. Researchers are encouraged to plan their research projects with ample time as IRB protocol reviews for NYC DOE sites take time to complete.

The DOE allows researchers to conduct studies in their school system, however, research activities must not compromise the privacy of their staff, students, and their families (or any site data). Research conducted in NYC public schools must also not interfere with the daily work of both students or staff. All research proposals must meet professional standards for the protection of human subjects, research design, and ethical practices. Additionally, proposals must also show that they have relevance for the NYC public school system.

The participant materials on file between the two institutions (TC IRB and NYC DOE IRB) **must be identical**. In other words, a modification to TC IRB should be submitted to reflect the requested revisions made by NYC DOE IRB to make both IRB protocols identical.

Updates to the TC IRB application should also be made to reflect changes to the research protocol.

A research protocol submission to the NYC DOE IRB office is required in order to conduct any research study with NYC public schools, their students, staff, or other affiliates. The NYC DOE IRB requires a protocol submission to ensure all research conducted at their sites (digital or physical) complies with their policies and standards for protecting students, staff, and parents.

NYC DOE considers anyone not conducting research on behalf of DOE an *external researcher*.

For example, even if you are an employee of NYC DOE and plan to complete research for your dissertation, you are still considered an *external researcher*, because that work is not on *behalf of* NYC DOE.

- The NYC DOE IRB defines engaging in research activities as any one who is:
  - Recruiting, consenting, collecting or analyzing data from a NYC DOE site (physically or digitally)
  - Engaging or entering NYC DOE sites (physically or digitally)
  - Interacting with NYC DOE staff, students, and their families (or any site data)
  - Interacting with students in-person (physically or digitally)
  - Accessing student direct identifiers
  - Accessing teacher direct identifiers
  - Accessing student family direct identifiers (through an NYC DOE site)

Before You Begin Engaging NYC DOE IRB

If you are currently a NYC DOE employee or affiliate, you must receive a determination from the *NYC DOE Conflict of Interest Board* **BEFORE** submitting your research protocol materials to the NYC DOE IRB.
- To receive this determination, contact NYC DOE Ethics Officer through [NYC DOE IRB's website](#) or email IRB@schools.nyc.gov for information.
- All researchers who are required to receive a determination from the *NYC DOE Conflict of Interest Board* should submit an application as early as possible as this process may take time to complete.

The NYC DOE IRB rarely permits any DOE staff from conducting research with their own school, students, parents, teachers, or other staff members who may be under the supervision of any member of the research team.

All researchers *external to NYC DOE* must receive approval from their home IRB (i.e., TC IRB) **BEFORE** submitting an IRB protocol to the NYC DOE IRB for review. The NYC DOE IRB identifies the home IRB as an external researcher's "IRB of Record" on their submission.

Please note that when initially submitting to the TC IRB, NYC DOE IRB templates and forms (i.e., consent forms, assent forms, etc.) are accepted and reviewed as they are the required template for the research site. It is *not* expected that researchers submit a version of their forms in both TC and NYC DOE formats.

NYC DOE IRB's IRBManager
All research protocol submissions reviewed by the NYC DOE IRB are processed through their IRBManager website. For information on IRB Manager, **consult the [NYC DOE IRB's website](#) or email** IRB@schools.nyc.gov.

- Researchers can use new or existing IRBManager accounts to create a research protocol submission for NYC DOE IRB review.
  - For existing account holders who need a password reset or cannot log-into IRBManager should **not** create a new account. Instead, contact IRB@schools.nyc.gov or RPSPresearch@schools.nyc.gov for assistance.
  - Researchers must use their college affiliated email address to create the account in IRBManager.
  - Faculty sponsors are required for all student research protocol submissions.
    - Faculty sponsors will also need to create their own IRBManager accounts to serve in this role.
- NYC DOE's IRBManager portal contains various templates.
  - For student studies, NYC DOE IRB recommends that students list themselves as the Primary Investigator (PI) unless the role of primary decision maker is the faculty sponsor.

NYC DOE IRB Research Protocol Submission Guidance
For information on IRB Manager or NYC DOE IRB protocol submission processes, **consult the [NYC DOE IRB's website](#) or email** IRB@schools.nyc.gov.
- NYC DOE IRB research protocol and supplemental documents for external researchers typically include:
  - CITI Program – Collaborative Institutional Training InitiativeCITI Training certificates
    - The NYC DOE IRB requires all researchers to complete the Social & Behavioral Research – Basic/Refresher course (ID 184110). Documentation of completion for this course must be provided for

IRB review at the time of protocol submission, or prior to submission using the Credentialing xForm in IRB Manager. Certificates of completion are valid for 5 years, after which point a Refresher course will be required.

- If your institution has a CITI or other training program that you would like to use as a substitute, please submit a request to IRB@schools.nyc.gov that includes the list of courses and demonstrates how these courses align with the NYC DOE IRB requirements (including the 26 modules required by NYC DOE IRB listed in their policy guide on page 41-42).
- Family Educational and Rights Privacy Act (FERPA) in education-based research settings and Protection of Pupil Rights Amendment (PPRA).
  - Complete the FERPA course and/or Information Privacy Security (IPS) course, if applicable.
    - Consult NYC DOE IRB's frequently asked questions (FAQs) for more information about these training requirements: External Data Requests
- All *external researchers* working with NYC DOE are strongly encouraged to complete the Conflicts of Interest course through CITI, although it is not typically required.
- Documentation approval from the researchers' home IRB (i.e., TC IRB)
- Primary Investigator and research study team personnel information (e.g., name, email, role on the project (researcher assistant, coordinator, etc.))
  - All student submissions are required to identify a faculty sponsor/advisor in their application.
  - For student studies, NYC DOE IRB recommends that students list themselves as the Primary Investigator (PI) unless the role of primary decision maker is the faculty sponsor.
    - Faculty sponsors are required for all student research protocol submissions
    - Faculty sponsors will also need to create their own IRBManager accounts to serve in this role.
- Research study site (e.g., the physical or digital NYC DOE site)
  - Researchers will be asked to clarify their inclusion/exclusion criteria for the proposed study site
- Research questions and how they relate to NYC DOE as a study site
- Data collection methods (e.g., before or after school), data collection measures (e.g., copies of surveys, interview questions, etc.)

- ○ Study subject populations with any inclusion/exclusion criteria (e.g., high school math students).
- ○ Risks and benefits to NYC DOE study subjects
- ○ Subject compensation procedures
- ○ Recruitment procedures or study eligibility screening procedures
- ○ Consent and assent procedures
- ○ Site Permission Form
    - ■ Signed by the school principal or site leader allowing you to conduct research at an physical NYC DOE site or with site staff, students and their families (or any site digital data)
    - ■ Researchers may need to request official and documented permission from teachers to work in their classrooms as well
- ○ [Data Security Plan](#) which includes confidentiality and subject privacy protections

Once all materials have been submitted to the NYC DOE IRB, student submitted protocols require advance approval by a faculty sponsor through the IRBmanager system. The NYC DOE IRB will not review a student research protocol submission until the faculty sponsor approves it first.

After NYC DOE IRB Research Protocol Approval and *Before* Site Access

After receiving a letter of approval from the NYC DOE IRB, all researchers are required to complete security clearance requirements **BEFORE** they can begin their study.

- ● Please note that all personnel names in an approved NYC DOE IRB protocol who conduct research activities in NYC DOE sites with, their staff, students, families, or access NYC DOE site data must complete all security clearance requirements.
- ● Security clearance documents can be emailed to IRB@schools.nyc.gov using password protected PDFs and "Confidential Mode" email functions (also see: [Working with NYC Department of Education](#)):
    - ○ A stamped approval letter to conduct from NYC DOE IRB
        - ■ This letter will contain all the research team member names.
    - ○ Copy of a government issued identification
    - ○ Social Security Number (SSN) and copy of a signed SSN card
    - ○ A list all research staff email addresses and phone numbers
        - ■ **If you are uncomfortable with submitting such documents by email, the NYC DOE IRB does allow for phone appointments in order to verbally submit required information.**
- ● Unfortunately, **there is currently no alternative option** to add individuals without a SSN for granting security clearance to an NYC DOE site.

- The NYC DOE uses the Personnel Eligibility Tracking System (PETS), a web-based application, to electronically track and share basic information regarding the eligibility status of individuals placed in NYC DOE schools. The NYC DOE IRB will verify all research protocol submission information through PETS to verify site security clearance. Researchers are **required to complete security clearance** in order to begin research participant recruitment and study procedures.
    - Researchers should receive an email from PETSAdminSupport@schools.nyc.gov outlining the steps in the security clearance process. This includes instructions on accessing the *Applicant Gateway* where all required forms are listed, where the fingerprinting process and fees are conducted, and a Background Questionnaire is available to submit.

Summary of NYC DOE IRB Protocol Submission Process

DOE IRB SUBMISSION
Obtain TC IRB approval first as your home IRB (TC IRB)
Obtain a Conflict of Interest determination if currently employed or affiliated with the NYC DOE
Complete CITI's Social and Behavioral Researchers Basic Course and any additional NYC DOE IRB CITI modules trainings, as needed
Submit NYC DOE IRB protocol materials through the IRBManager website portal. Follow NYC DOE IRB instructions regarding their protocol submission process.

- Materials to submit to NYC DOE IRB
    ○ Study protocol and all details asked for in application
    ○ Recruitment materials
    ○ Consent materials
    ○ School permission letter (principal or teacher if applicable)
    ○ Training certifications (e.g., CITI certificate)
    ○ Faculty Advisor Information (for student submissions only)
    ○ A copy of your home IRB approval letter
    ○ Copy of the protocol application submitted to your home IRB (if differing in format from what is submitted to NYC DOE IRB)

- Receive Security Clearance after NYC DOE IRB approval letter
    - PETS clearance
    - Fingerprinting
- Remider: All required documents may be submitted to the NYC DOE through

confidential emailing or through verbal submission over a phone appointment.
Study may not begin without the express approval from the NYC DOE IRB.
Protocol modifications after initial approval: ● All researchers are expected to submit all protocol modifications to their home IRB for approval first, then submitted to the NYC DOE IRB. Engaging in these modifications cannot happen until both IRBs (TC and NYC DOE) have approved them.

Contact NYC DOE IRB for Studies at NYC DOE Sites

Please contact your research site through the NYC DOE IRB (IRB@schools.nyc.gov) should you have any questions regarding their process of approvals, revisions, and protocol requirements. TC IRB _does not_ have jurisdiction over NYC DOE IRB or NYC DOE sites.

TC IRB specialists review IRB protocols on a case-by-case basis. Individual feedback and requests for revisions will be provided after submission and before approval.

TC researchers must keep both TC and NYC DOE protocol submissions up-to-date. All suggested modifications from the NYC DOE IRB must also be submitted to the TC IRB so all submitted protocols mirror each other.

Infographic Accessible Version:

- Title: NYC DOE, How to Submit Research Protocols to the NYC DOE.
- Step 1: TC IRB Approval. Obtain TC IRB approval first as your home IRB.
- Step 2: Conflict of Interest. The NYC DOE requires that if a researcher is affiliated with the DOE in another capacity, that a Conflict of Interest Determination must be obtained before their protocol can be reviewed.
- Step 3: Training Modules. Complete CITI's Social and Behavioral Researchers Basic Course and any additional NYC DOE IRB CITI modules training, as needed.
- Step 4: Submit Protocol to NYC DOE. Submit NYC DOE IRB protocol materials through the IRBManager website portal. Follow NYC DOE IRB instructions regarding their protocol submission process. Materials to submit to NYC DOE IRB: Study protocol and all details asked for in application, Recruitment materials, Consent materials, School permission letter (principal or teacher if applicable), Training certifications (for example the CITI certificate), Faculty Advisor Information (for student submissions only), A copy of your home IRB approval letter, and a Copy of the protocol application submitted to your home IRB (if differing in format from what is submitted to NYC DOE IRB).

- Step 5: Security Clearances. Receive the necessary Security Clearance after NYC DOE IRB approval letter: PETS clearance and Fingerprinting. Reminder: All required documents may be submitted to the NYC DOE through confidential emailing or through verbal submission over a phone appointment.
- Step 6: After Approval: Protocol Modifications. All researchers are expected to submit all protocol modifications to their home IRB for approval first, then submitted to the NYC DOE IRB. Engaging in these modifications cannot happen until both IRBs (TC and NYC DOE) have approved them.
- Reminder: Your Study may not begin without the express approval from the NYC DOE IRB.

NYC DOE

How to Submit Research Protocols to the NYC DOE

1 — **TC IRB Approval**

Obtain TC IRB approval first as your home IRB (TC IRB)

Conflict of Interest — **2**

The NYC DOE requires that if a researcher is affiliated with the DOE in another capacity, that a Conflict of Interest Determination must be obtained _before_ their protocol can be reviewed.

3 — **Training Modules**

Complete CITI's Social and Behavioral Researchers Basic Course and any additional NYC DOE IRB CITI modules trainings, as needed

Submit Protocol to NYC DOE — **4**

Submit NYC DOE IRB protocol materials through the IRBManager website portal. Follow NYC DOE IRB instructions regarding their protocol submission process.

- Materials to submit to NYC DOE IRB:
  - Study protocol and all details asked for in application
  - Recruitment materials
  - Consent materials
  - School permission letter (principal or teacher if applicable)

- Training certifications (e.g., CITI certificate)
- Faculty Advisor Information (for student submissions only)
- A copy of your home IRB approval letter
- Copy of the protocol application submitted to your home IRB (if differing in format from what is submitted to NYC DOE IRB)

5 — **Security Clearances**

Receive necessary Security Clearance after NYC DOE IRB approval letter
  - PETS clearance
  - Fingerprinting

Remider: All required documents may be submitted to the NYC DOE through confidential emailing or through verbal submission over a phone appointment.

After Approval: Protocol Modifications — **6**

All researchers are expected to submit all protocol modifications to their home IRB for approval first, then submitted to the NYC DOE IRB. Engaging in these modifications cannot happen until both IRBs (TC and NYC DOE) have approved them.

Your Study may not begin without the express approval from the NYC DOE IRB.