



DEPARTMENT OF DEFENSE
EDUCATION ACTIVITY
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Education Directorate

DoDEA Administrative Instruction 2071.3
Date June 27, 2008

DEPARTMENT OF DEFENSE EDUCATION ACTIVITY
ADMINISTRATIVE INSTRUCTION

SUBJECT: Research Approval Process

References: See Enclosure 1.

1. PURPOSE. This Administrative Instruction:

- a. Replaces DoDEA Regulation 2071.2 (Reference (a)).
- b. Updates policies and procedures governing the approval and monitoring of research studies involving Department of Defense Education Activity (DoDEA) school personnel, school facilities, students, sponsors, and/or data.
- c. Implements DoD Directive 3216.02 (Reference (b)), part 219 of title 32, Code of Federal Regulations (Reference (c)), part 46 of title 45, Code of Federal Regulations (Reference (d)), section 980 of title 10, United States Code (Reference (e)), sections 3501-3520 of title 44, United States Code (Reference (f)), DoD Directive 8910.01 (Reference (g)), pages 76260-76264 of Volume 65, Federal Register (Reference (h)), and section 552a of title 5, United States Code (Reference (i)).

2. APPLICABILITY. This Administrative Instruction applies to:

- a. The Office of the Director, Department of Defense Education Activity (DoDEA); the Director, Domestic Dependent Elementary and Secondary Schools, and Department of Defense Dependents Schools, Cuba (DDESS/DoDDS-Cuba); the Director, Department of Defense Dependents Schools, Europe (DoDDS-E); the Director, Department of Defense Dependents Schools, Pacific and Director, Domestic Dependent Elementary and Secondary Schools, Guam (DoDDS-P/DDESS-Guam); and all DoDEA District Superintendents, School Principals, Teachers, and Staff.
- b. Any individuals or organizations who wish to propose data collection activities and/or studies not sponsored by DoDEA, that involve DoDEA school personnel, school facilities, sponsors, students, and/or data.

3. DEFINITIONS. See glossary.

4. POLICY. It is DoDEA policy that:

a. All research conducted in the DoDEA school system shall adhere to recognized ethical standards of conduct.

b. All research conducted in the DoDEA school system by DoDEA employees, and/or by private organizations, individuals, or institutions not under contract with DoDEA, shall follow the approval procedures provided in this Administrative Instruction.

c. All research conducted in the DoDEA school system shall be aligned with the DoDEA Community Strategic Plan and shall be in accordance with References (e) and (f).

d. Research conducted in the DoDEA school system shall not unduly affect the students or employees of DoDEA as an organization (e.g., not disrupt the classroom lessons).

e. The identity of specific military installations, the names or locations of the schools, or the name of the school system (i.e., DDESS/DoDDS-Cuba, DoDDS-E, or DoDDS-P/DDESS-Guam) shall be revealed ONLY when authorized by the Associate Director for Education, Department of Defense Education Activity (ADE, DoDEA).

f. Permission to conduct research does not constitute commitment of resources or endorsement of the study or its findings by DoDEA.


g. DoDEA may assume primary oversight responsibility for the research when DoDEA personnel are conducting research and do not have access to a Federally assured Institutional Review Board (IRB) (e.g., at an institution of higher learning).

h. All research involving students conducted in DoDEA will comply with subpart D, of Reference (d) as required by Reference (b).

5. RESPONSIBILITIES. See Enclosure 2.

6. PROCEDURES. Enclosure 3 provides overarching procedures and requirements for the review and approval of a research study request.

7. EFFECTIVE DATE. This Administrative Instruction is effective immediately.



Joseph D. Tafoya
Director

Enclosures

1. References
 2. Responsibilities
 3. Procedures
 4. DoDEA Form 2071.3 – F1, “Research Study Request”
 5. DoDEA Form 2071.3 – F2, “Research Agreement”
 6. DoDEA Form 2071.3 – F3, “Research Endorsement”
 7. DoDEA Form 2071.3 – F4, “Principal and Superintendent Permission”
- Glossary

ENCLOSURE 1

REFERENCES

- (a) DoDEA 2071.2, "Research Approval Process," April 8, 1998 (hereby canceled)
- (b) DoD Directive 3216.02, "Protection of Human Subjects and Adherence to Ethical Standards in DoD-Supported Research," March 25, 2002
- (c) Part 219 of title 32, Code of Federal Regulations
- (d) Part 46 of title 45, Code of Federal Regulations
- (e) Section 980 of title 10, United States Code
- (f) Sections 3501-3520 of title 44, United States Code
- (g) DoD Directive 8910.01, "Management and Control of Information Requirements," March 6, 2007
- (h) Pages 76260-76264 of Volume 65, Federal Register, December 6, 2000
- (i) Section 552a of title 5, United States Code

ENCLOSURE 2

RESPONSIBILITIES

1. Director, Department Of Defense Education Activity (Director, DoDEA). The Director, DoDEA, shall have the authority to:
 - a. Suspend or terminate approval of research.
 - b. Review and subsequently grant permission for research which is otherwise in compliance with References (b) through (i).
2. ADE, DoDEA. The ADE, DoDEA, under the authority, direction, and control of the Director, DoDEA, shall establish procedures and standards consistent with the Federal Policy on Research Misconduct (Reference (g)), for the prevention of research misconduct in the Department of Defense Education Activity.
3. Assistant Associate Director for Education, Department of Defense Education Activity (AADE, DoDEA). The AADE, DoDEA, shall:
 - a. Have authority to grant or deny permission for all research proposals which are otherwise in compliance with References (b) through (i).
 - b. Coordinate with the Component Designated Oversight Office (CDOO) of the Office of the Under Secretary of Defense for Personnel and Readiness (OUSDP&R) or with the IRB of record, as appropriate, if the proposed research meets the definition of human subjects research in Reference (c).
 - c. Oversee DoDEA's implementation of Federal assurances of compliance regarding the protection of human subjects in research.
 - d. Report promptly to the Principal Deputy Director DoDEA, CDOO, and IRB of record any unanticipated problems involving risks to subjects or others, any serious or continuing noncompliance with this policy, the requirements or determinations of the IRB, or any suspension or termination of IRB approval.
4. Chief, Research and Evaluation, Department of Defense Education Activity (Chief, R&E, DoDEA). The Chief, R&E, DoDEA, DoDEA, shall:
 - a. Coordinate and oversee a review committee to review all research proposals.
 - b. Coordinate with DoDEA Principals, Superintendents, and the cognizant Area Director for their permission to have the proposed research conducted in their schools.
 - c. Inform researchers in writing of the results of the review process.

- d. Ensure that researchers understand their responsibilities under this policy.
- e. Provide agency approval for research requests.

5. Director, Domestic Dependent Elementary and Secondary Schools, and Department of Defense Dependents Schools, Cuba (DDESS/DoDDS-Cuba); the Director, Department of Defense Dependents Schools, Europe (DoDDS-E); the Director, Department of Defense Dependents Schools, Pacific and Director, Domestic Dependent Elementary and Secondary Schools, Guam (DoDDS-P/DDESS-Guam). The Director, DDESS/DoDDS-Cuba; the Director, DoDDS-E; and the Director, DoDDS-P/DDESS-Guam; shall:

- a. Have the authority to concur/nonconcur with the research committee's recommendation for all research studies proposed for schools in their Area.
- b. Coordinate with DoDEA Principals and Superintendents for their concurrence to have the proposed research conducted in their schools.
- c. Report to the Chief, R&E, DoDEA, any unanticipated problems involving risks to subjects or others or any serious or continuing noncompliance with this policy or the requirements or determinations of the IRB or any suspension or termination of IRB approval.

6. DoDEA District Superintendents. The DoDEA District Superintendents shall:

- a. Have the authority to concur/nonconcur with the research committee's recommendation for all research studies proposed for schools in their district.
- b. Coordinate with DoDEA Principals for their permission to have the proposed research conducted in their schools.
- c. Report to the cognizant Area Director any unanticipated problems involving risks to subjects or others or any serious or continuing noncompliance with this policy or the requirements or determinations of the IRB or any suspension or termination of IRB approval.

7. DoDEA Principals. The DoDEA Principals shall:

- a. Have the authority to grant approval for their school to participate in all research studies proposed for their school(s).
- b. Report to the district superintendent(s) any unanticipated problems involving risks to subjects or others or any serious or continuing noncompliance with this policy or the requirements or determinations of the IRB or any suspension or termination of IRB approval.

ENCLOSURE 3

PROCEDURES

1. REVIEW PROCESS

a. The Chief, R&E, DoDEA, will be the first to review the soundness of any proposed research.

b. Additional reviews by the IRB of record and by the CDOO for the OUSD(P&R) shall be conducted, as appropriate, if DoDEA:

(1) Finds the research does not qualify for exemption under Reference (c).

(2) Determines that a secondary agency review is necessary.

2. SUBMISSION

a. All individuals or organizations who wish to conduct research in DoDEA school districts shall complete the following:

(1) DoDEA Form 2071.3-F1, "A Research Study Request," (Enclosure 4).

(2) DoDEA Form 2071.3-F2, "A Research Agreement," (Enclosure 5).

(3) DoDEA Form 2071.3-F3, "A Research Endorsement," (Enclosure 6).

b. A researcher who is a DoDEA employee, shall submit DoDEA Form 2071.3-F4, "Principal and Superintendent Permission," (Enclosure 7) to the principal(s) and superintendent(s) of the school(s) where the researcher proposes to conduct research. The principal(s) and superintendent(s) must give permission prior to the researcher submitting the research proposal to the Chief, R&E, DoDEA.

c. A researcher who is not a DoDEA employee shall NOT submit the Principal and Superintendent Permission form. The Chief, R&E, DoDEA will submit this form to the principal(s) and superintendent(s).

d. Individuals or organizations that propose to conduct research in DoDEA shall:

(1) Complete the Collaborative Institutional Training Initiative (CITI) prior to submitting their research proposal.

(2) Adhere to this Administrative Instruction while conducting research.

(3) Complete DoDEA Forms 2071.3 F-1 through F-3 (Enclosures 4-6).

(4) Inform all participants (i.e., students, sponsors or guardians, and DoDEA personnel) that participation in the proposed research study is voluntary, to the extent required under Reference (c).

(5) Obtain informed consent from participants of legal age, unless a waiver is obtained under Reference (c) and in accordance with Reference (e).

(6) When participants are not of legal age, obtain:

(a) Informed assent from individuals not of legal age, and

(b) Consent from a sponsor, parent or guardian, unless a waiver is obtained under Reference (c) and in accordance with Reference (e).

(7) Obtain permission for all information collections as required under References (f) and/or (g).

(8) Preserve the confidentiality of each participant unless otherwise given consent/assent.

(9) Maintain all information obtained in the strictest of confidence, as mandated under Reference (i).

(10) Report any proposed changes in the research to the Chief, R&E, DoDEA, and the IRB prior to implementing the changes; except as allowed under Reference (c).

(11) Promptly report any suspension or termination of IRB approval or any unanticipated problems involving risk to subjects to the IRB and to the Chief, R&E, DoDEA.

3. THE IRB REVIEW. The researcher shall:

a. Ensure that an IRB review of the proposed research is conducted.

b. Ensure that, if available, an IRB review is conducted by his or her respective university or branch of military prior to submitting the research proposal to DoDEA.

c. Seek an IRB review through an independent IRB with an approved assurance if no university or military IRB review is available.

d. Provide the Chief, R&E, DoDEA, with documented completion of the IRB review in the form of a certificate or letter that states that IRB approval for the proposed study has been granted and contact information for the accredited research affiliate.

e. Submit a Research Study Request Packet including all forms and support materials (i.e., Enclosures 2-5, survey instrument(s), blank assent and permission forms, IRB approval, etc.) to: Department of Defense Education Activity, Research and Evaluation Branch, 4040 N. Fairfax Drive, Arlington, VA 22203, FAX (703) 588-3766.

4. AGENCY APPROVAL

- a. All research study requests will be reviewed by a research committee, established at DoDEA Headquarters, with appropriate members appointed by the Chief, R&E, DoDEA.
- b. The research committee shall review research requests at least monthly.
- c. Research requests must receive permission from the DoDEA Superintendent(s) and DoDEA Principal(s) in the district(s) and school(s) where the research will be conducted prior to being submitted to DoDEA.
- d. Research requests will be reviewed by the cognizant Area Director(s) after review by the research committee.
- e. The Chief, R&E, DoDEA, shall give agency approval for requests based on recommendations of the research committee members, the OUSD(P&R), CDOO, the IRB, and the cognizant DoDEA Area Director(s), Superintendent(s), and Principal(s).
- f. The researchers will be informed in writing of the results of the review process and the final approval decision.

5. CONDUCTING RESEARCH

- a. Individuals or organizations that are given permission to conduct research studies in DoDEA schools/districts shall abide by standards of professional conduct at all times. Failure to do so will be sufficient cause for DoDEA permission to be terminated.
- b. Research that receives agency approval from the Chief, R&E, DoDEA, only allows the researcher to proceed with the research as described; it is not an endorsement and does not compel any personnel, students, or sponsors of the DoDEA system to participate in research studies.
- c. Researchers shall contact the Chief, R&E, DoDEA, in writing if there are any changes to the study that was given agency approval prior to continuing with the study. This includes changes to the protocol, stopping the study for any reason, adding or deleting parts of the study, etc.
- d. The Chief, R&E, DoDEA, shall maintain a file of all approved research requests for three years from the conclusion of the research project.

6. REPORTING REQUIREMENTS

- a. The researcher shall submit an update prior to the one year anniversary of the approval and then annually thereafter of ongoing research to the Chief, R&E, DoDEA. Failure to provide the update may result in termination of the research.

b. The researcher shall submit an electronic copy of the final research report to the Chief, R&E, DoDEA within two months of concluding the research report.

c. Before submitting research for publication, the researcher must obtain permission of the Chief, R&E, DoDEA. After publication, the researcher shall provide the Chief, R&E, DoDEA, with one copy of the published work and give DoDEA permission for further dissemination within DoDEA.