

## **Policy 8.15 Permission to Conduct Research**

### **1.0 Scope**

This policy provides criteria, restrictions, and procedures for researchers seeking permission to administer studies or collect data at the college.

### **2.0 Responsibilities**

The Office of Institutional Effectiveness (OIE) is responsible for this policy and for coordinating research at the college. This policy applies to employees, students, and external organizations and individuals seeking to perform research through the college.

### **3.0 Definitions**

**Researcher** – any prospective individual or organization (internal or external) who seeks to complete their dissertation, thesis, or conduct focused research seeking data or feedback from individuals affiliated with the college (i.e., students, alumni, employees).

### **4.0 Policy**

The college allows internal and external researchers to perform research at the college provided they follow the criteria and procedures in this policy, and their research is evaluated and approved by the college's site Institutional Review Board (IRB).

### **4.1 Criteria**

Research proposals are expected to satisfy all the following criteria:

- A. The proposed research should lead to worthwhile educational benefits or knowledge for students, the community, and/or personnel of the college.
- B. Proposed research is expected to support college policies and practices.
- C. The methodology and scope of the study should align with one another; research questions should not veer from the intended study scope.
- D. Any sponsored research should focus on the sponsor's own area of expertise and/or position unless the sponsor can demonstrate that they and the researcher have approached and are collaborating with the responsible area(s) of the college.
- E. If the researcher seeks to perform interviews and/or focus groups and the college IRB requests it, the session will be recorded and/or a college employee will be present during the session.
- F. The time of students, faculty, and/or personnel required by the research is fully justified by the expected educational benefits to students and/or personnel. In all cases, intrusion on student and personnel time and disruption of normal routines in classrooms and colleges must be minimal.

## College Policies and Procedures

- G. Student identity and personal identifiable information is protected by the college unless the study participant provides consent and then information or data is only shared within the confines of the research, itself, or if the information is tied to an employee's current access and is accessed in a project related to their employment.
- H. If a researcher seeks protected information, they must request and submit to legal review by the Virginia Community College System (VCCS). The release of any protected data is contingent upon a final determination of the VCCS, in which case the college is not required to release any information unless directed by the VCCS to do so.
- I. The researcher completes the research request form and submits all required evidence for IRB review.
- J. The researcher accepts that submission of a research request form does not grant automatic approval to proceed with a study or to contact faculty, students, or staff on the study's behalf.
- K. The researcher acts in a professional and courteous manner to college faculty, students, and staff at all times.
- L. The researcher agrees to not harass or retaliate against any participant on the basis of their identity, affiliation, or responses, and accepts that a participant can withdraw from a study, penalty-free, at any time.
- M. The researcher does not hold college participants liable for any loaned equipment or instruments attached to the study.
- N. The researcher does not misrepresent themselves or their intention to the college.
- O. The proposed research is not found by the IRB to be leading and/or potentially induce acute trauma within our student, faculty, and/or personnel populations.
- P. If the proposed research is tied to a university or college or to a grant-funded project, the researcher has been approved (or received conditional approval) by the protection of human subjects committee of the investigator's own institution.
- Q. The researcher agrees to share their results with the college, either in the form of an abstract or as a presentation.
- R. The researcher agrees that the identity of the college will be anonymous in any published research, and any data or information provided to the college will be in aggregate form and/or personnel or student data de-identified.
- S. The researcher agrees to provide six-month progress reports to the IRB, in cases where a study may be administered over an extended period of time.
- T. The researcher agrees to allow the college to make non-commercial use of the research results to the benefit of the college, its faculty, students, and/or staff.
- U. The researcher agrees to not recruit on-campus, but to work directly with the Office of Institutional Effectiveness (OIE) on any research-related matter and accepts that OIE will administer any recruitment or research solicitation on their behalf.
- V. The researcher provides a reasonable timeline to administer the research.
- W. Any grant-funded research activity initiated by a partnership between the college and an external partner should first notify OIE and permit, when requested, the IRB to review the request and provide feedback to the interested parties before the partnership requests data or information from the college.

- X. The researcher agrees to accept the final decision and/or adhere to any conditions set forth by the college IRB.

#### **4.2 Virginia Community College System Restricted Use Data Sharing**

This policy restricts a researcher's access to protected information under FERPA. Any researcher who seeks data or information that is not accessible under this policy can send the Office of Institutional Effectiveness a Freedom of Information Act (FOIA) request, which will be sent to the college FOIA Officer.

If a researcher requests restricted-use data, which includes personally identifiable information subject to the Family Educational Rights and Privacy Act (FERPA), 20 USC §1232(g), the researcher will need to request said data from the Virginia Community College System (VCCS) legal office.

The Restricted Use Data Agreement requires the completion of:

1. A description of the proposed project
2. A data protection security plan for the restricted-use data
3. A list of requested data elements
4. Affidavits of Non-Disclosure for each person who will have access to the data.

This Agreement is available through the Office of Institutional Effectiveness. Once complete, it shall be reviewed by the Virginia Community College System (VCCS). If approved, the VCCS shall direct the disclosure of the requested information under the terms of this Agreement. If disapproved, the VCCS shall provide specific information about the reasons for non-approval.

#### **5.0 Procedure**

A request to conduct research at the college is accessible through a downloadable form ([https://www.brightpoint.edu/uploads/documents/ie\\_research\\_request\\_form.docx](https://www.brightpoint.edu/uploads/documents/ie_research_request_form.docx)) on the public-facing Office of Institutional Effectiveness (OIE) webpage (<https://www.brightpoint.edu/about/offices-and-divisions/institutional-effectiveness>). The form, once completed, shall be submitted to [reports@brightpoint.edu](mailto:reports@brightpoint.edu) before the request is reviewed by the college Institutional Review Board.

The research request will be reviewed and evaluated by the college Institutional Review Board (IRB). The IRB is composed of college personnel qualified to evaluate research requests.

An interview with the researcher may be requested when information beyond that submitted in the electronic request is necessary to adequately review the request. The IRB may suggest revisions to the proposal prior to a final decision.

## College Policies and Procedures

Once all materials are received and reviewed by the IRB, the request will be approved with or without conditions, or denied on the basis of the criteria in 4.1 of this policy. The researcher will be expected to adhere to all related college and VCCS policies. Otherwise, the researcher may be found in non-compliance, which could restrict their access to data and/or participants.

Following an IRB decision, the researcher will be notified by the Office of Institutional Effectiveness. If the research proposal is accepted, the correspondence may specify the --

1. Procedures to be followed by the researcher for actual implementation of the project, and/or
2. Special conditions or constraints, if any, which may apply to the project.