A SOCIAL, BEHAVIORAL, & EDUCATIONAL RESEARCH (SBER) CASE STUDY OF EDUCATION RESEARCH

THE EFFECTIVENESS OF MIDDLE SCHOOL “GRIT” TRAINING AS MEDIATED BY TRAUMATIC LIFE EXPERIENCES

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OVERVIEW

The social, behavioral, and educational research (SBER) case studies provide education and guidance on how to identify and mitigate risks associated with SBER. These studies may be used by both IRB administrators and investigators when reviewing and designing research studies that involved SBER components.

Case studies follow a standard format that includes: 1) a fact pattern, 2) regulatory, cultural, and ethical issues, and 3) a risk/benefit analysis and risk management options. This format was created to allow for flexibility in applying the case studies.

By identifying common themes, linking them directly to federal regulations and guidance, and outlining risk mitigation options, the case studies can be used in a variety of ways, which include: 1) as an education tool for training individuals in human subjects research, 2) as a basis for developing reviewer checklists/worksheets, and 3) as a tool in designing research projects.

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CASE STUDY

SCENARIO/FACT PATTERN:

A team led by an experienced researcher from the School of Education wants to study a six-week program initiated by the Heroes Charter School to train middle school students to exhibit “grit” (perseverance and passion for long-term goals). The researchers want to investigate how the students’ backgrounds, specifically previous traumatic life experiences, modulate their response to the grit curriculum.

The Principal Investigator (PI) met with the Heroes Charter School leadership to discuss the study. The school Principal is enthusiastic and the PI has obtained a letter of support signed by the Superintendent.

The charter school will stagger the implementation of the grit training due to resource constraints. The researchers plan to study the students in two different classes, comparing educational and behavioral school records at four time points: (1) prior to any training, (2) after the training has occurred in the first class but not in the second, (3) just after the training has occurred in the second class, and (4) at the end of the semester. The research team and school leadership discussed the class selection process and determined that the teacher of each class will be asked to consent to the study being performed in their class.

To determine the students’ history of traumatic life experiences and their psychological profile, the research team proposes to interview students, in the presence of a school staff member. The school is planning to implement the training within the next month, and because of this time constraint, the
interviews will take place before, during, and after the grit training. Each student will be given a $15 gift card for participating in the interview.

The researchers propose to address a Parent Teacher Association (PTA) meeting to introduce the study and answer questions, making it clear that:

- The school will implement the grit curriculum regardless of the researchers’ involvement;
- A school staff member will be present during the interviews, and thus, because school staff are mandated reporters, any information obtained during the interviews that indicates possible child abuse or neglect will be reported to the appropriate authorities; and
- Any findings of concern from the psychological tests will be reported to the parent/guardian.

For the interviews, the researchers propose to obtain permission from one parent or legal guardian. The school would send home two copies of the permission/assent form with the student. One copy would be signed by the parent/guardian and the student and returned to the school; the other copy would be retained by the parent/guardian. Translated documents will be made available, as needed.

Before scheduling any interviews, the researchers plan to speak to the parent/guardian by telephone to go over the permission form and ensure comprehension. Assent would be obtained again from the students at the start of the interview. If a student seems distressed during the interview, the school staff member will be responsible for following up.

For analysis of school records to evaluate the response to the grit training, the researchers propose waiving parent/guardian permission because they would be analyzing the records as an agent of the school to evaluate the effectiveness of the program, and the analysis would be invalid unless all students were included.

Given the fact that the school would be involved in the permission/assent process and a school staff member would be present during the interviews, during the discussions with school leadership, it was agreed that the school is engaged in research. The letter of support from the superintendent makes clear that the school will pursue its own IRB review and approval.

The researchers argue that the study has the potential to provide direct benefits to the children who are interviewed, because the children will receive a psychological screening during the interview, and that the study has the potential to yield generalizable knowledge about the benefit of a grit training curriculum for students with previous traumatic life experiences.
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DISCUSSION

Questions/Comments for the researcher:

- What are the training and experience of the researchers who will be interviewing the students about sensitive topics, including trauma, sexuality, and depression?
- Should the parent/guardian permission process require permission from both parents/guardians, because the interview may obtain information about illegal behavior, abuse, and psychological problems of both the child and his/her family and household members?
- How will the researchers verify that the person giving permission is the parent or legal guardian?
- Since a school staff member is present during the interviews, what are the qualifications of these individuals in dealing with sensitive topics, including trauma, sexuality, and depression? What provisions has the school made for following up on concerning information and with whom and in what time frame will the school staff member follow up?
- Could the risks associated with the interview be further minimized by removing sensitive questions less likely to affect the student's response to grit training?
- What protections are in place to ensure the security of the research data in electronic and paper versions?
- Because communication about the research will come from the school, parents/guardians and students may believe that they will be penalized for not agreeing to participate, particularly since teachers and other school staff will know who is taken out of class to be interviewed. How can the perception of coercion be reduced?

REGULATORY, CULTURAL, & ETHICAL ISSUES:

- School Records: FERPA, the Family Educational Rights and Privacy Act (34 CFR Part 99), specifies the circumstances under which a school can share educational records. These researchers would be able to obtain identifiable records without written parent/guardian permission because they are conducting research on behalf of the school. The researchers must obtain a Memorandum of Understanding (also called a Data Use Agreement), signed by the school and by the researchers' institution, specifying that the data will be handled in accord with FERPA requirements.

- Waiver of parent/guardian permission for analyzing school records: As described above, FERPA does allow schools to share educational records without written parent/guardian permission in some circumstances. However, obtaining this private identifiable information constitutes human subjects research, so the IRB must also determine that the study meets the criteria for a waiver under 46.116(d) as follows: (1) The research involves no more than minimal risk to the subjects; (2) The waiver or alteration will not adversely affect the rights and welfare of the subjects; (3) The research could not practically be carried out without the waiver or alteration; and (4) Whenever appropriate, the subjects will be provided with additional pertinent information after participation.

- Obtaining information from students about sensitive topics: Protection of Pupil Rights Amendment (PPRA) (34 CFR Part 98) requires written parent/guardian permission prior to obtain information from students about certain specified topics: (1) Political affiliations; (2) Mental and psychological problems potentially embarrassing to the student and his/her family; (3) Sex behavior, and attitudes; (4) Illegal, anti-social, self-incriminating, and demeaning behavior; (5) Critical appraisals of other individuals with whom respondents have close family relationships; (6) Legally recognized privileged or analogous relationships, such as those of lawyers, physicians, and
ministers; or (7) Income (other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program). Although the PPRA applies only to research funded by the Department of Education, many IRBs and school systems apply these standards to all research. Since the researchers plan to obtain written parent/guardian permission for the interviews, the standards of PPRA would be satisfied.

• Mandated reporting: State law governs who is obligated to report suspected child abuse or neglect. In Massachusetts, most school staffs are mandated reporters, as are healthcare (including mental health) professionals, firefighters, police, clergy members, foster parents, parole officers, and social workers. Since the researchers plan to have a school staff member present during the interviews, there will be an obligation to report suspected child abuse or neglect; however, if instead only researchers were present in the interviews, the IRB would have to consider the legal and ethical obligations for reporting.

• Exempt Educational Research: Some educational research is exempt under §46.101(b)(1): Research conducted in established or commonly accepted educational settings, involving normal educational practices, such as (i) research on regular and special education instructional strategies, or (ii) research on the effectiveness of or the comparison among instructional techniques, curricula, or classroom management methods. The inclusion of questions about past trauma in the interviews makes this study ineligible for this exemption determination; however, it could qualify if the interview were limited to questions about the grit training (“What did you like/dislike about the training?” “How did it help/hurt you in school?” etc.)

• Child Research Categories: 45 CFR 46, Subpart D specifies additional protections for minors involved as research participants. Whether or not the research is greater than minimal risk and whether it presents the prospect of direct benefit or not determines which of the child research regulations apply to the study (45 CFR 46.404-406). Minimal risk (45 CFR 46.102(i)) means that the probability and magnitude of harm or discomfort anticipated in the research are not greater in and of themselves than those ordinarily encountered by a healthy child in daily life or during the performance of routine physical or psychological examinations or tests.

• If the research is not greater than minimal risk to children, 45 CFR 46.404 is met; the study can be approved regardless of whether there is benefit to the child. The minor’s assent and one parent’s/guardian’s permission would be required (45 CFR 46.408). The questions about past traumatic events may be determined not to be “routine psychological examinations,” and therefore this study may be determined to present more than minimal risk to children.

• If the research involves greater than minimal risk, but presents the prospect of direct benefit to the individual participants, the research could still be approved (45 CFR 46.405) with the permission of one parent/guardian (45 CFR 46.408). Research that involves greater than minimal risk and no prospect of direct benefit to individual participants, but it is likely to yield generalizable knowledge about the participant’s disorder or condition, is still approvable (45 CFR 46.406). However, if there is no prospect of direct benefit, permission of both parents/guardians is required, unless one parent/guardian is deceased, unknown, incompetent, or not reasonably available, or when only one parent has legal responsibility for the care and custody of the child (45 CFR 46.408).

Questions for the IRB:

• Is this study greater than minimal risk because of the potential to spark investigations into potential child abuse and/or to cause distress in children asked to recall traumatic events in a non-therapeutic (i.e., school) setting?

• Are the researchers correct in characterizing the benefits of study participation? Is the psychological screening really a direct benefit?

• Are there adequate measures to prevent parents/guardians or students from feeling pressure from the school to agree to participate?
• Is the $15 gift certificate for the interviews appropriate compensation?

• Are the researchers’ measures for documenting guardianship sufficient?

• Does the process for obtaining parent/guardian permission sufficiently protect students and parents/guardians?

• Are the provisions (using school resources) for support of students experiencing distress adequate? How will parents/guardians be notified if a student is determined to have psychological problems requiring further care? For how long after the interview will support services be offered?

• As parents/guardians may refuse permission for the interview because they do not want school officials to know about a past traumatic event, which may have an impact on study enrollment, should school personnel be involved in the interviews? Should only members of the study team be present during the interviews? Should interviews be performed after school to help conceal who participates?

• Is it appropriate to grant the request to waive parental permission for obtaining school records? Should the IRB instead require an information sheet (with appropriate translated versions) be sent home to all parents/guardians, with an option for them to refuse to allow their child’s record to be used for research by contacting the school or the researchers? Some IRBs would consider this a waiver of documentation of consent under 45 CFR 46.117(c) and others a waiver of consent under 45 CFR 116(d), depending on whether it is assumed that all parents/guardians would get the information. The communication would have to be done carefully to avoid confusion with the permission/assent process for the interview.

**RESOLUTION & DISCUSSIONS:**

**Risk/Benefit Analysis:**

The three main sources of risk in this study are:

• The disruption, potential stigmatization, and potential legal implications to families if an investigation is started into potential child abuse based on statements by the child in the interview since a member of the school staff will be present, as mandated reporters, any suspicions must be reported and investigated

• The psychological distress caused by asking children to talk about past traumatic events

• The possible breach of confidentiality and stigmatization because the research is conducted in a school setting and a school staff member is present during the interviews.

Additional risks include the accidental release of private information because of “hackers” and parental/guardian distrust of the school allowing their children to be used as research subjects, particularly considering the request to waive permission for analysis of school records.

If the background information provided by the researchers indicates the strong likelihood of a connection between past trauma and responsiveness to grit training, then the study may provide generalizable knowledge that could benefit schools implementing grit training, assuming the sample size is adequate. In addition, if the psychological screening and follow-up were handled well, this may provide a direct benefit to the students who were interviewed.

**Mitigation/Management of Risks:**

The three main risks can be minimized, but not eliminated, by:

• Fully disclosing them to the parents/guardians and children,

• Ensuring that the interviewers have appropriate training and experience in interviewing traumatized children, and
• Following up on concerning findings (the IRB may consider requiring more than just using school resources for immediate distress and notifying the parents/guardians of problems revealed in screening).

The proposal to conduct the research in a school rather than in a therapeutic setting introduces additional questions about whether parents/guardians and students would provide fully informed consent (permission from the parents/guardians and assent from the students) without coercion, and about whether students may be reluctant to pursue support services through a particular school staff member because of personality difference/negative prior interaction, lack of prior relationship, etc. The consent process must find a balance between allowing parents/guardians and children who prefer not to accept the risks of the interviews and recruiting sufficient numbers of children for the interviews to provide meaningful results.

If the IRB finds that the risks are not sufficiently minimized, or are not reasonable in relation to the anticipated benefits, then it could be suggested to the researchers that they change the interviews to administering routine psychological tests, which would be less likely to reveal abuse or cause distress.

Standard measures such as encryption should be used to protect the confidentiality of electronic copies of interview answers and school records. Having a member of the school staff present during the interviews may be required by the research team’s institutional policy requiring that a researcher not be alone with a student; this also means that the staff member must be sensitive to keeping the information from the interview private.

Alternate Details:
• Some of the students to be potentially enrolled are wards of the state.
• The school specializes in special needs students.
• The ages of the students change (older or younger).
• The school was originally planning to implement the grit training in both classes simultaneously, but changed to the staggered schedule at the request of the researchers, thereby delaying this beneficial training for some students.
• The researchers want to observe and videotape the classrooms during the grit training in order to correlate the participation of individual students with their interview results.
• To eliminate the variability between different teachers in how the grit training is delivered, the researchers will be the ones teaching the grit curriculum.
• Two researchers rather than a school staff member will be present at the interview, and none of the researchers are mandated reporters under applicable state law.
• The researchers ask to waive all permission to better protect confidentiality.

Other Events:
• A parent contacts the IRB to complain that her child’s teacher is repeatedly calling out the names of students who have not returned the parent permission form.
• The researchers report that one of the teachers has not been allowing students to miss class for the interviews and requests that they are allowed to interview the children after school instead without re-obtaining parental permission.
**REFERENCE(s)**


FERPA: Family Educational Rights and Privacy Act ([34 CFR Part 99](http://catalyst.harvard.edu/programs/regulatory/sber.html))

PPRA: The Protection of Pupil Rights Amendment ([34 CFR Part 98](http://catalyst.harvard.edu/programs/regulatory/sber.html))

Waiver of consent: 45 CFR [46.116(c) and (d)](http://catalyst.harvard.edu/programs/regulatory/sber.html)

Waiver of documentation of consent: [45 CFR 46.117(c)](http://catalyst.harvard.edu/programs/regulatory/sber.html)

DHHS regulations pertaining to the enrollment of minors ([Subpart D](http://catalyst.harvard.edu/programs/regulatory/sber.html))

OHRP Research with Children [FAQs](http://catalyst.harvard.edu/programs/regulatory/sber.html)