

## External Research Requests

# Guidance for the Review of Primary Data Collection for Research Studies Initiated Outside of Kamehameha Schools

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## Purpose

Research and evaluation are critical in guiding us toward a thriving lāhui and should flourish within and beyond Kamehameha Schools (KS). This involves expanding the pool of practitioners who are empowered to conduct, disseminate, and use findings in ethically, culturally, and organizationally responsible ways.

To assist with this, the Strategy & Transformation Group has documented a procedure for gaining approval to conduct primary data collection for non-KS initiated research and evaluation studies.



KAMEHAMEHA SCHOOLS

## Scope of this Guidance

This guidance cover non-KS initiated research that involves primary data collection. Studies that meet all of the following criteria are **required** to receive approval prior to beginning:

### What does gathering information ABOUT individuals mean?

Gathering information about individuals means that the focus is on people and their opinions, perceptions, choices, or decisions regarding themselves or how methods, policies, procedures, organizations, etc. affect them and their environment (e.g., “Do you think that the operating hours of our preschool should be extended?”). If the focus of the project is only on products, methods, procedures, or organizations, then information is not being collected about individuals (e.g., “What are the operating hours of your preschool?”).

- The study involves observing, interacting, or intervening with Kamehameha Schools’ individuals (e.g., students, employees) for the purposes of collecting information about individuals.
- The study is a systematic investigation meant to contribute to generalizable knowledge or to evaluate an item of interest.
- The study is not initiated by KS. The personnel managing or conducting the project may be a KS employee, but s/he is not acting on behalf of KS with regard to this project (e.g., a KS campus teacher gathers student data to support dissertation requirements).

Class projects conducted by KS employees are exempt from this guidance and are at the discretion of the employee’s direct leadership. Class projects are activities done as an assignment for the sole purpose of fulfilling a requirement for a particular class (e.g., a KS teacher analyzing student attendance information as homework assignment in graduate school). A review is still required for projects that are a part of a thesis or dissertation.

Please note that case studies, oral histories, and ethnographies may meet the criteria above. Journalistic activities typically do not meet these criteria.

## Review Phases

There are three review phases for research activities that meet the above criteria:

### Prior to the Study: Study Review

Non-KS initiated research that conducts primary data collection must be reviewed by the Strategy & Transformation Group (S&T) and the impacted KS Group (i.e., the Group that will be involved in the study) prior to the study beginning.

### During the Study: Communicating Changes

Changes to the study design must be reported to S&T. S&T will review these changes. Approval of changes is required before the study can be continued.

### After the Study: Publication Review

Publications must be reviewed and approved by S&T prior to release.

### Prior to the Study: Study Review

This review takes place prior to beginning the study. The Principal Investigator (PI) initiates this review by submitting a Research Study Application and supporting documents. The Research Study Application captures information about the study team, study information, human subject protection, connection to KS’ Vision 2040, adherence to indigenous standards, and dissemination plans.



There are six steps to the review process as outlined below and described in Table 1:



Along with the Application, the following supporting documents must be provided:

- Full Research Proposal including description of research questions, participants, methodology, limitations, timeline of activities, and impact of study. If this information is contained in the Institutional Review Board Application than a proposal does not need to be submitted.
- Resume/CV (for non-KS employees)
- Institutional Review Board Application and Approval (if pending, please provide when received)
- Data Collection Instruments
- Consent Forms
- Human Subject Protection Certification or Training Documentation

Studies are reviewed according to the following areas:

**General**

- The study supports KS' Vision or Strategic Plan 2020.
- The study provides value to the field of study.
- The study design is methodologically sound.
- The study is supported by KS' Research and Evaluation guiding principles.

**Data Collection**

- The study minimizes burden to participants.
- The study provides Human Subjects protection.
- The study minimizes disruptions to school/program operations.
- The study adheres to KS' policy and procedures regarding data access and sharing.

**Additional Information:**

- Any previous KS studies addressing the same topic
- Concurrent data collection activities that may create undue burden on participants
- Legal implications/considerations
- Dissemination activities

The *Study Review Form* is available in the appendix.

A final decision letter will be provided to the PI that explains if the study is approved or not approved. Studies that are "approved with modifications" will need to be revised before receiving a final decision letter. Templates of decision letters are provided in the Appendix.

Table 1. Review Process for Study Proposals

1

DETERMINE

Determine if your study meets all of the following criteria. If so, your study will need to be reviewed by Strategy & Transformation.

- You will be observing, interacting, or intervening with Kamehameha Schools' individuals (e.g., students, employees) for the purposes of collecting information about individuals.
- Your study is a systematic investigation meant to contribute to generalizable knowledge or to evaluate an item of interest.
- Your study is a non-KS initiated study (i.e., a study that is not initiated and managed by KS).

In making this determination, the principal investigator may consult with Strategy & Transformation Group.

*Primary responsibility: Principal investigator*

2

SUBMIT

If your study meets the criteria in Step 1, submit your study for review by Strategy & Transformation.

The principal investigator must submit a completed **Research Study Application** to S&T for review. Activities may not begin until the researcher receives a written letter of approval.

The **Research Study Application** is available in the Appendix.

*Primary responsibility: Principal investigator*

3

REVIEW

The Strategy & Transformation group will complete a review in coordination with relevant KS Groups including the KS Group(s) involved in the study implementation, Legal Group, and Enterprise Information Management Systems (as needed). A review typically takes two to four weeks and is dependent upon the volume of research requests and complexity of the study.

Please ensure all necessary study documents are submitted. Incomplete documents will delay the review of your request.

The **Study Review Form** used by reviewers is available in the Appendix.

*Primary responsibility: Strategy & Transformation, KS groups involved in the study, Legal, and Enterprise Information Management Systems (as needed)*

4

DECISION

A decision is made, and a written response is provided to the principal investigator. There are three possible decisions:

**Approved:** Principal investigator is approved to begin the study.

**Approved with modifications:** Principal investigator modifies study according to KS feedback and resubmits documents.

**Not approved:** The study may not proceed forward.

*Primary responsibility: Strategy & Transformation*

5

BEGIN

Approved studies may begin according to the terms set forth in the approval letter.

*Primary responsibility: Principal investigator*

6

DELIVER

Study updates and final products are provided to Strategy & Transformation.

*Primary responsibility: Principal investigator*

In the case that the PI’s institution requires approval of a study prior to review by their IRB, we will issue a conditional approval letter as long as a research proposal is provided and passes our internal review. A final letter of approval will be issued once we receive the IRB approval and any outstanding documents.

### During the Study: Communicating Changes

Any changes in study procedures or personnel after receiving approval must be communicated in writing immediately to S&T and the identified Group liaison. Changes should be communicated and discussed prior to them taking place. KS has the right to stop any study should the changes to the study impact the initial review areas.

### After the Study: Publication Review

We believe that quality research should be shared broadly in order to contribute to the knowledge base upon which KS and others can learn from and utilize. As such, we presume that all research should be made available widely through journal articles, conference presentations, or other venues. However, there will be some circumstances in which the release of an article could be harmful to participants or have negative implications to our organization.

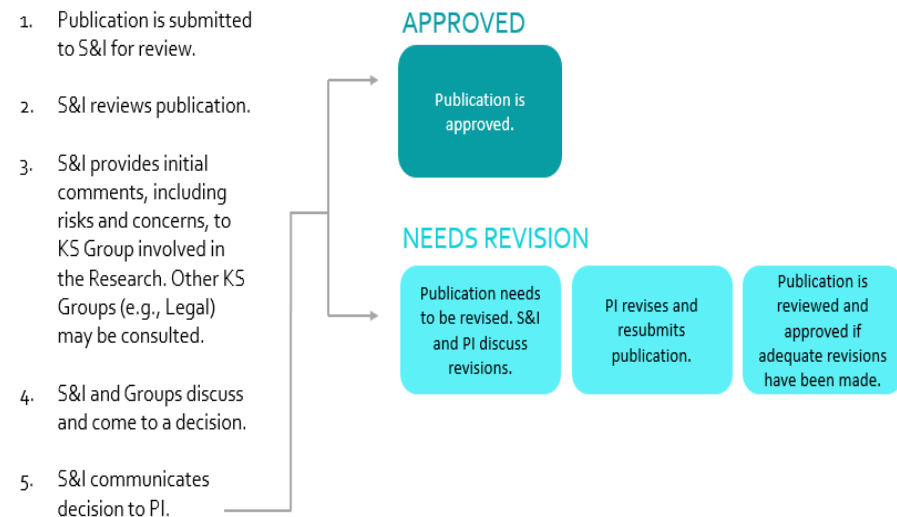
As such, S&T reviews publications that include findings and discussion/ interpretation of results prior to them being released. Examples of publications include journal publications, conference presentations, theses or dissertations, and workgroup share outs. Publications that are limited to information solely about the study methodology, approach, or study design do not need to be reviewed.

This aligns with KS Procedure 200.2.24 – Disclosing Student Records to Organizations Conducting Educational Studies.<sup>1</sup>

The PI should allow up to 1 month for review prior to the anticipated release date. Any content changes to the publication that occurs following S&T review and approval must be conveyed in writing to S&T and are subject to another review.

Supporting documents to the reviewed publication are also approved for release as long as they do not contain new content (e.g., PowerPoint slides or an infographic based on the reviewed full report).

The publication review process is outlined in Figure 1 below:



The *Publication Review Form* is available in the Appendix.

A final decision letter will be provided to the PI that explains if the publication is approved or requires revision. Publications that are not approved will need to be revised before receiving a final decision letter. Templates of decision letter are provided in the appendix.

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 =EVSfSS` VadbcdYdE\_d[ UgM` Y  
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## Appendix

1. **Research Study Application:** Application submitted by PI to initiate a review
2. **Study Review Form:** Form used to review publications
3. **Study Update Guidance:** Guidance on information to be contained in a Study Update



Research Study Application

INTRODUCTION

Aloha mai kākou! To begin the research review process, please fill out this form and provide supporting documentation (listed below) to Kamehameha Schools' (KS) Strategy & Transformation Group at [strategy.innovation@ksbe.edu](mailto:strategy.innovation@ksbe.edu).

Please ensure that you submit the following (check which items you are including):

- Research Review Request Form
 Research Proposal including description of research questions, participants, methodology, limitations, timeline of activities, and impact(s) of study. If this information is contained in the Institutional Review Board Application than a proposal does not need to be submitted.
 Resume/CV (for non-KS employees)
 IRB Application and Approval (if pending, please provide when received)
 Data Collection Instruments
 Consent Forms
 Human Subject Protection Certification or Training Documentation

If you are submitting additional documents or not including any of those listed above, please describe:

Upon receiving all study documents, Strategy & Transformation will work with the other KS Group(s) involved in your study to complete a review. This review typically takes 4-6 weeks. You may access the form used by reviewers [here](#).

Please ensure all necessary study documents are submitted. Incomplete documents will delay the review of your request.

SECTION 1: STUDY TEAM INFORMATION

Principal Investigator Name:

- Position/Title:
Organization:
Address:
Phone:
Email:

Kamehameha Schools Employee?  Yes  No

If yes, please provide Group and Division Name:

Co-Principal Investigator Name (if applicable):

- Position/Title:
Organization:
Address:
Phone:
Email:

Kamehameha Schools Employee?  Yes  No

If yes, please provide Group and Division Name:

Please provide names and affiliations of any additional study team members:

## SECTION 2: STUDY INFORMATION

Study Title:

Date you are submitting this form:

Anticipated Study Start Date:

Anticipated Study End Date:

Are any federal or state funds (e.g., federal grants, being used to support your study?)

- Yes
- No
- Not Sure

Is this the first time you are submitting a research review request form for this study:

- Yes
- No (please provide dates (month/year) previous requests were submitted:

What type of KS data will be used in your study? Check all that apply.

**Primary data** (I will be collecting original data for the purposes of this study.)

**Secondary data** (I am seeking access to existing data that was previously collected or stored by Kamehameha Schools.)

Does Which groups will you collecting data from? Check all that apply.

- KS Students
- KS Program
- Participants
- KS Teachers
- KS Administrators or Staff

Please describe in detail what secondary data you are seeking to access:

What questions is your study aiming to answer?

Please explain how your study builds upon the existing knowledge base or otherwise supports the following.

Kamehameha Schools' Vision 2040 or Strategic Plan 2020. For more information visit our [Strategic Plan website](#).

Field of Study

Perpetuation of Hawaiian Culture



Please discuss how the following principles may inform or guide your study design and implementation.

Kamehameha Schools aspires to conduct and support research activities conducted from an indigenous worldview and adhere to high quality standards. These draft principles represent where we would like our work to be in the future and serve as goals for us to strive toward.

1. Research is meaningful, applicable, and conducted for the betterment of the Native Hawaiian community.
2. Research is situated within historical and contemporary contexts and are conducted within a Hawaiian worldview.
3. Research is conducted with the input and support of the Native Hawaiian community.
4. Research utilizes diverse and alternative data sources such as oli, mele, mo`olelo, `ōlelo no`eau, and historical documents.
5. Research findings are communicated openly and shared in a timely manner and used to inform action.

Please provide information on how findings from your study will be disseminated.

Please initial to indicate acknowledgement of the statement below regarding publications:

KS implements a publication review process that review publications for (1) KS identification, (2) potential risks to KS constituents, and (3) legal implications. Please see the KS External Guidance document for more information.

How will study findings be disseminated and to whom? Check all that apply.

- Internal KS audience
- Dissertation Committee or Defense audience
- External audience (e.g., outside of Kamehameha Schools). Please describe:
- Journal publication
- Other:

### SECTION 3: HUMAN SUBJECTS PROTECTION

Please address the following questions, or your Institutional Review Board (IRB) Application may be submitted in lieu of these questions as long as that application fully addresses these areas.

1. Please provide the name of any human subject protection training that you have completed.
2. Provide a detailed description of the proposed involvement of subjects. Describe the characteristics of the subjects, including the anticipated number that will be involved, the age range. Identify the criteria for inclusion or exclusion of any subjects. Explain the rationale for the involvement of special populations, such as children, persons with disabilities, pregnant women, prisoners, etc.
3. Identify the sources of research material obtained from or about individually identifiable subjects in the form of specimens, records, or data. Describe the procedures to be used and the types of data to be collected (e.g., standardized test, interviews, observations, etc). Indicate whether the material or data would be obtained specially for research purposes or whether the study will use existing records or data.
4. For primary data collection, describe the plans for the recruitment of subjects and consent procedures to be followed. Include the circumstances under which consent will be sought and obtained, who will seek it, the nature of the information to be provided to prospective subjects, and the method of documenting consent. Indicate how subjects will be informed of their right to withdraw participation. (Attach ALL consent forms and/ or oral statements.)
5. Describe potential risks (physical, psychological, social, legal, or other) to human subjects and assess their likelihood and seriousness. Where appropriate, describe alternative treatments and procedures that might reduce the risks to subjects.
6. Describe the procedures for protecting against or minimizing potential risks (including risks to confidentiality) and assess their likely effectiveness. Discuss how confidentiality will be protected, who will have access to data, and provisions for securing the data. Discuss provisions for necessary medical or professional interventions in the event of adverse effects to the subjects. For primary data collection, describe the data collection process and any provisions for monitoring the data collection to ensure the safety and well-being of the subjects.
7. Discuss why the risks to subjects are reasonable in relation to the anticipated benefits to subjects and in relation to the importance of the knowledge that may reasonably be expected to result.



Reviewers' Form

Enter Study Name

Principal Investigator (PI)	
Additional Researchers	
KS Group(s) Involved	
Reviewers	
Date review was completed	
Application	<input type="checkbox"/> New <input type="checkbox"/> Resubmittal

SUMMARY

After reviewing all documentation, we have made the following decision regarding your study:

- APPROVED:** Principal investigator is approved to begin the study.
- APPROVED WITH MODIFICATIONS:** Principal investigator modifies study according to KS feedback and resubmits documents.
- NOT APPROVED:** The study is not approved and may not proceed forward.

Next Steps:

REVIEW COMMENTS

	Does Not Meet Standard	Meets Standard	Exceeds Standard
<b>General Information</b>			
The study supports KS' Vision or Strategic Plan 2020.			
The study provides value to the field of study.			
The study design is methodologically sound.			
Other comments			
<b>Data Collection</b>			
The study minimizes burden to participants.			
The study provides Human Subject protection.			
The study minimizes disruptions to school/program operations.			
The study adheres to KS' policy and procedures regarding data access.			
Other comments			
<b>Additional Information</b>			
Describe any previous KS studies addressing the same topic			
Explain if other concurrent data collection activities will create undue burden on participants			
Identify any legal implications/considerations that this study needs to account for			
Other comments			
<b>Dissemination</b>			

Recommendations
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Approvals

_____	_____
Name	Date
Group Name	

_____	_____
Name	Date
Strategy & Innovation	



*As applicable:*

_____	_____
Name	Date
Legal	

_____	_____
Name	Date
Enterprise Information Management Systems	



## KAMEHAMEHA SCHOOLS

### Guidance on Study Updates

Study updates should be provided according the dates provided in the study approval letter. These updates can be provided in any written format and should contain the following information:

1. Progress on study activities outlined in the study proposal
2. Progress on study timeline as outlined in the study proposal
3. Any challenges in implementation
4. Documentation of changes to the study design, including communication to and approval of changes by Strategy & Innovation.

Updates do not need to be extensive. A paragraph on each of the areas above is sufficient.

As an alternative, the PI may provide in whole, or part of, an update put together for another entity (e.g., dissertation chair, funding agency, etc.) so to not duplicate work. Please ensure that if an update put together for another entity is provided, that the update still contains the information listed above.

Please submit study updates to Strategy & Transformation and your identified Group liaison.