

EFFECTIVE DECEMBER 15, 2021

For information or help, contact the IRB Office
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Class Assignments & IRB Approval

The purpose of these procedures is to:

- Clarify when class assignments fall under the jurisdiction of the IRB
- Underscore the instructor's obligations to consider and mitigate potential risks to individuals even when class assignments are not under IRB jurisdiction

Student Data Collection Projects

Some types of student projects involve collecting information from people, but do not meet the regulatory definition of IRB-regulated *research*. Examples include projects designed to:

- Tell an individual's story (oral history interviews, biographies, or other journalistic interviews)
- Collect information about organizations and not individuals

For these projects, it is **best practice to check with the IRB** for a determination regarding whether IRB review is necessary.

Some faculty members design data collection assignments that involve questionnaires, interviews, or other interactions with individuals, such as those commonly used in research methods courses. In these cases, faculty should consider if such assignments should be reviewed by the IRB to ensure the protection of human participants. The following information should help faculty to make an informed decision in these cases.

Student Class Assignment Definition

Student *class assignments* include data collection activities that are:

- Conducted during or outside the classroom, **with the students enrolled in the official course** (for credit or not for credit); this could include multiple course sections
- Conducted in fulfillment of class assignments

- Typically initiated and completed within a single term
- Designed to teach research methods through student interaction with individuals or data about individuals, or designed to help students understand concepts covered by the course
- Generally, not intended to create new knowledge or to lead to scholarly publication

Student class assignments, as a general rule, are not systematic data collection efforts intended to develop or contribute to generalizable knowledge, and thus, do not meet the federal regulatory definition of research (45 CFR 46.102 (1)). Therefore, as a rule, student class assignments do not fall under the jurisdiction of the IRB and do not require IRB application, approval, and/or oversight.

Most student class assignments pose little to no risk to students or others. However, instructors should take special care to ensure that students realize the potential for harm and take all possible steps to eliminate the risks to students involved in the assignment. These risks may include: physical harm, or potential psychological, social, economic, or legal harm, especially when data is collected about sexual activity, use of alcohol or illegal drugs, or involvement in illegal activities. Such risks can be exacerbated when the individuals are minors or people who are otherwise vulnerable, such as cognitively-impaired persons.

Student class assignments that **are** intended to collect information systematically with the intent to contribute to generalizable knowledge (i.e., publish, present, or disseminate data to the academic, professional, or on-/off-campus communities (including administrators and community partners)) **meet** the federal regulatory definition of “research.” These class assignments fall under the jurisdiction of the IRB and require IRB application, approval, and oversight. Instructors wishing to use such assignments must apply to the IRB for review and approval of these assignments before they begin.

Class assignments may become subject to this policy (and be considered regulated research) if the faculty member or the students change their plans to use the data during the data collection or after the data have been collected. If the faculty member or students wish to use data collected from class assignments for research and publication, application to the IRB for permission to use existing data is required.

Independent research projects (e.g., theses, honor projects, independent studies) conducted by students that collect data through interactions with living people or access to private information fall under the jurisdiction of the IRB. Application to the IRB for these student research projects must include a faculty/staff member as the Principal Investigator to accept the overall responsibility of the project.

Levels of IRB Review

In reviewing an application for student research conducted within the context of a course, the IRB may determine that the activity qualifies as an:

- **Exempt Protocol**

A declaration of exemption means that a project is reviewed by the IRB Chairperson

- **Expedited Protocol**

A declaration of expedited means that the IRB Chairperson and/or other designated person(s) may approve a project on behalf of the entire IRB committee

- **Full Board Protocol**

A declaration of full board means that the project requires review at a convened meeting of the entire IRB committee;

Please refer to: <https://www.sru.edu/offices/institutional-review-board/how-to-apply-to-the-irb> to determine the appropriate level of review for class projects that fall under the 'research' designation.

Instructor Obligation

Even when a class data collection assignment is not considered to be research, and thus is not under the jurisdiction of the IRB, faculty members have an *affirmative obligation* to ensure that students understand their ethical obligations in carrying out their assignments. Instructors should provide guidance to students who will be collecting data in an effort to minimize any intentional harm to other students, especially if private information is collected, or if information is collected from vulnerable individuals.

Faculty members may utilize a number of means to educate students and encourage responsible interactions with others, including:

- Reviewing students' plans for classroom or group projects and suggesting improvements in design and the protection of confidentiality
- Requesting that students complete CITI on-line training in human subject protection before collecting information from others
- Explaining ways in which students should be attentive to the welfare of individuals in cases of:
 - Vulnerable populations, such as minors, prisoners, or the cognitively-impaired
 - Any possibility of physical harm to the student or other individuals
 - Sensitive questions, including topics related to sexual activity, victimization, the use of alcohol or illegal drugs, or involvement in illegal activities
 - Requiring printed instructions/information on questionnaires that explain the use of the data for coursework only and the name and contact information of the instructor
 - Requiring, when possible, anonymous data collection so that the data are not linked to individuals
 - Requiring that information identifying individuals be kept separately from the information collected from those individuals
 - Requiring the destruction of all non-research data at the end of the course or within a short time afterward
 - Instructing students about the privacy and security vulnerabilities associated with networked computers

IRB Review of Student Research and Class Projects Quick Guide

Type of Student Project	Is IRB Approval Required?
Student research that is designed to answer a research question and contribute to a field of knowledge, and that involves one or more of the following: • Interactions with individuals in person, via mail, email, web survey, or telephone • Conditions/Interventions (manipulations of the participant or the participant's environment) • Access to private identifiable information Example: Senior thesis, independent/undergraduate research	IRB approval is required.
Class projects (individual or group) designed for <u>pedagogical purposes only</u>. That is, the primary purpose of the activity is skill/process development. The audience for the results of the activity is the other students in the class and the instructor. Examples of educational activities include: learning how to conduct interviews, both structured and unstructured; learning how to analyze research data; and/or learning how to conduct ethnography. These activities usually involve research questions, but there is not intent to contribute to a field of knowledge. The results of the activity will be shared in class, but may not be presented publicly in: senior theses, websites, social media sites, blogs, conference presentations, and/or journal articles.	IRB approval is not required. Class projects designed as educational activities do not meet the definition of research with human subjects and, therefore, do not fall under the jurisdiction of the IRB. It is the responsibility of the instructor to ensure class projects are conducted ethically. For example, if students collect data from other students in the class for the purposes of learning how to complete statistical analyses, instructors are responsible for ensuring that students providing the data cannot be identified, directly or indirectly.
Class projects (individual or group) that are undertaken as both an educational experience AND as research. The research component may be individual or group.	IRB review is required. Pilot studies are covered in the federal definition of research with human subjects.
A student-led classroom project that the instructor may use in his or her own research.	IRB review is required. If an instructor anticipates that the data gathered from students for either pedagogical or research purposes could be used for their own research, the research needs appropriate IRB review.

Questions?

To ask a question, express concerns, or provide suggestions about human research protections at SRU, please send a message to irb@sru.edu.