

## Institutional Review Board

### IRB GUIDANCE FOR CLASS PROJECTS

Federal regulations and college policies require Institutional Review Board (IRB) approval for research with human subjects. This applies whether the research is conducted by staff, faculty or students, by individuals or a group. *Failure to obtain proper approval in advance may jeopardize your data, prevent you from publishing the results, and place you and the college in violation of federal regulations.* At the same time, many class projects are conducted for educational purposes and not as research, and will not require IRB approval. This guidance will help you determine whether you need to get approval from the IRB before conducting a given activity. Please note that the IRB does not have the option of granting “retroactive” approval after research is done; you should err on the side of submitting or consulting with the IRB if there is any doubt.

### CLASS PROJECTS

Class projects are generally conducted for educational purposes and not as research. While some require submission of an IRB application or a determination that IRB approval is not required, many class projects require neither. Instructors and departments are encouraged to contact the IRB for guidance about ways to handle topics such as privacy, confidentiality, informed consent, and professional ethics when class projects are part of the course syllabus. The IRB chair and staff can share knowledge related to managing risks of deductive disclosure, coercion-free recruiting, informed consent, and special considerations for projects that include potentially vulnerable individuals. These issues may still remain even when IRB approval is not required, in which case instructors, advisors, departments and schools play an even greater role in providing the appropriate guidance and oversight. Common scenarios:

SCENARIO:	ACTION REQUIRED:
<b>CLASS PROJECTS</b> involving <b>secondary data analyses</b> that are assigned and conducted as educational exercises, using data that are either publicly available data, de-identified or otherwise impossible to be linked to personal identities.	<b>No IRB action required (neither approval nor determination of human research status)</b>
<b>CLASS PROJECTS</b> involving <b>secondary data analyses</b> that are assigned and conducted as educational exercises, and that use datasets that include private information and codes that link to identifiers, but the students do not have access to the identifiers.	<b>No IRB action required (neither approval nor determination of human research status)</b> Class instructor and department are responsible for providing the necessary training in respecting the confidentiality of the data.
<b>CLASS PROJECTS</b> or <b>PRACTICA</b> that involve <b>direct interaction</b> (e.g., in person, via mail, email, web surveys, or telephone), but where the purpose is training, an educational exercise or professional development, and <b>not research</b> . The project or practicum is not “research” even if students ask people questions as part of learning how to conduct interviews or surveys, take histories, administer assessments, or perform “in-house” evaluations as requested by the practicum site.	<b>No IRB action required (neither approval nor determination of human research status)</b> but may be requested if instructor or students are unsure, or if documentation is required by gatekeepers (e.g., schools, businesses) for access to participants. Class instructor and department are responsible for providing the necessary training in respecting

<p><i>Exception:</i> If a student decides <i>after</i> the completion of a practicum activity to pursue additional activities with the same information for a master's project or paper, then an IRB application describing research use of secondary data should be submitted for approval, as above.</p>	<p>the privacy of the individuals and the confidentiality of any resulting information, along with training in the relevant professional ethics. Instructor provides information about the assignment for the students to distribute to people who participate in these class projects. List the instructor as the appropriate contact person should questions arise.</p>
<p><b>CLASS PROJECTS or PRACTICA</b> that <b>involve direct interaction or secondary analyses of private identifiable data</b> and are undertaken as <b>both an educational experience and as research</b> (e.g., results of these activities will be presented publicly or otherwise disseminated, or the data will be stored and used by the students or others as research data).</p> <p><i>Submission Tip:</i> Such projects may be very similar to one another. For example, each student may interview one or more persons for a group of oral histories, or conduct telephone surveys as part of a yearly poll, but all in the class follow the same general script or guidelines. If class projects follow different protocols, a table or chart can describe these more individualized activities, under the umbrella of a single IRB application.</p>	<p><b>IRB approval required</b></p> <p>When there are several students in a class doing similar projects, a <b>single IRB application may be submitted by the course instructor as PI</b>, listing all students who will be involved. If projects vary greatly, then it may be preferable to submit individual IRB applications with the student(s) as PI.</p>