

Institutional Review Board

GUIDELINES FOR RESEARCH INVOLVING NON-UMSL RESEARCHERS

1. Introduction

The University of Missouri–St. Louis (UMSL) is occasionally contacted by researchers at other institutions with a request to recruit UMSL students or faculty to participate in their human subjects research. This document describes the UMSL Institutional Review Board (IRB) requirements for review of human subjects research involving non-UMSL researchers.

2. Definitions

Research is defined as a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge [[45CFR46.102](#)] or activities that meet the Food and Drug Administration’s (FDA) definition of a [“clinical investigation”](#).

Human Subject is a living individual about whom an investigator (whether professional or student) conducting research (i) obtains information or biospecimens through intervention or interaction with the individual, and uses, studies, or analyzes the information or biospecimens; or (ii) obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens [[45CFR46.102](#)]. See also the FDA definition of [“human subject”](#).

Non-UMSL Researcher is a researcher that is not under the authority of UMSL.

Engaged (in conduct of research): Involved in human subjects research in such a way (or to the extent) that the ethical and regulatory requirements for human subjects protection are applicable. An individual (or institution) becomes engaged in human subjects research when, for the purposes of non-exempt research, the individual (or institution’s employee or agent) obtains any of the following:

- Data about research participants through intervention or interaction
- Identifiable, private information about research participants
- Informed consent of research participants.

Note: An organization is also engaged whenever it is a direct recipient of a federal award to support the research. UMSL IRB uses the [OHRP Guidance on Engagement](#) in making determinations regarding engagement.

3. Non-UMSL Researcher Conducting Research at UMSL

Non-UMSL (external) researchers who propose to do research using UMSL facilities, resources, or private information, or who aim to include UMSL agents as study subjects, and UMSL agents are not engaged in conducting the research, should follow these requirements:

1. Submit a copy of study materials (external IRB Application, IRB approval letter and study instruments) and details regarding recruitment and research procedures taking place at UMSL to danielle.hunter@umsl.edu.
2. Do not begin research at UMSL until UMSL IRB has confirmed local IRB review is not required.
3. Once UMSL IRB indicates it is acceptable to conduct the research at UMSL, an acknowledgment letter will be issued. The Office of Institutional Research will work with the non-UMSL researcher to access the appropriate population* to send out research materials. If seeking to recruit faculty or students from a specific unit, it will be necessary to pursue the appropriate approvals/letters of support from any cooperating UMSL agents or offices (e.g., Department Chair approval if seeking to recruit unit faculty).

Note: If UMSL agents are determined to be engaged in the research, UMSL IRB submission may be required.

*The research population will not include students who are 18 and up that have invoked [FERPA](#) or students who are part of the high school advanced credit program.