

## IRB Guidance for Student Research and Class Projects

This document provides guidance for students and instructors to determine whether class projects meet the definition of research with human subjects and whether Institutional Review Board (IRB) approval is required prior to conducting the class activities. **Federal regulations and university policies require IRB approval for research with human subjects.** This applies whether research is conducted by faculty or students. However, many class projects are conducted for pedagogical purposes and not as research, and thus, do not require IRB approval. IRBs may not approve research retroactively, therefore if there is any doubt, please consult with the IRB or submit an application for review.

The following are considered research that requires IRB review and NOT class projects. •

Undergraduate theses that may be presented in a professional venue

- Honor's theses
- Master's theses

**1) Class projects (individual or group) that are designed for pedagogical purposes only.** That is, the primary purpose of the activity is skill development. The audience for the results of the activity is the other students and the instructor. Examples of educational activities include learning how to conduct interviews, both structured and unstructured, learning how to analyze research data, and learning how to conduct ethnography. These activities usually involve a research question, but there is no 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 journal articles.** (Some departments encourage students to present their results at intra-departmental presentations, even when the intent is pedagogical. In other words, part of learning how to conduct research is learning how to present it.) **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 purview of the IRB. It is the responsibility of the instructor to ensure that class projects are conducted ethically. For example, if students collect data from other students for the purposes of learning how to do statistical analyses, instructors are responsible for ensuring that the students providing the data cannot be identified, directly or indirectly. **People who agree to take part in student projects need to be told that the projects are being conducted to meet a course requirement and that any data collected will not be made public.**

**2) Class projects (individual or group) that undertaken as both an educational experience AND as research.** Class projects that involve systematic collection of data for which the design or objective is to develop or contribute to generalizable knowledge are considered research. In other words, if the student or instructor plans to use the data outside of the

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class, the project is considered research and **requires IRB review**. If a student and/or instructor is uncertain whether or not a project will produce findings worthy of publication or dissemination outside of the immediate classroom environment, that student and/or instructor should submit the project for IRB review when the intent of the project becomes to conduct research (i.e., to contribute to generalizable knowledge), as opposed to the intent of instructing students on research methodology. Pilot studies are covered in the federal definition of research with human subjects.

- 3) 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 by students for either pedagogical or research purposes could be used for their own research, **the research needs IRB review.**

### **Do classroom projects require IRB review?**

**Examples of activities that may not need IRB review are:**

- Data collection for internal departmental, school, or other college administrative purposes (e.g. teaching evaluations, course evaluations)
- If your research is a class project or term paper and will not be published in any form at any time.
- Reviews and searches of existing literature and research involving a living individual, such as a biography, that is not generalizable beyond that individual.

**Use the following guidelines to determine if your activities in the classroom are subject to IRB review. IRB review is NOT required if all of the following are true:**

1. The project is limited to surveys/questionnaires/interviews/observations of public behavior directly related to topics being studied in an official college course.
2. The above surveys/questionnaires/activities, etc. contain no sensitive personal questions (e.g., no questions about drug use, sexual behavior or attitudes, criminal activity, grades, medical history) or other personal information that could stigmatize an individual.
3. The data is collected anonymously or, if identifiers are recorded, the information collected could not reasonably harm the individual's reputation, employability, financial standing, or place them at risk for criminal or civil liability.
4. The participants in the project are not from a vulnerable or special population (e.g., pregnant women, prisoners, minors, cognitively impaired individuals).
5. The collected data does not leave the classroom setting, or if the project involves collecting data on an organization, agency or company, the data are shared only with that entity.

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6. No UMSL employee or student is receiving financial compensation for collecting, organizing, analyzing, or reporting the data.

If not all of these guidelines are met, it is likely that your project will require IRB approval. Please consult with the IRB office or College of Nursing Research Office .

### **Faculty Oversight Responsibilities:**

Even when a class assignment is "non-research" and, thus, 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 collecting information so as to minimize any unwitting or unintentional harms to other students or to individuals, especially if students will interact with or collect private information about vulnerable individuals.

### **Faculty members may use a number of ways to educate students and encourage responsible interactions with others, including:**

- The instructor, as supervisor of the class projects, is encouraged to take the CITI on-line training on human subject protection before class project implementation.
- Expectation is that the class projects are minimal risk and don't involve vulnerable populations or collect sensitive data.
- Reviewing students' plans for classroom or group projects and suggesting improvements in design and protections for confidentiality
- Requesting that students take the CITI on-line training on human subject protection before collecting information from others
- Explaining ways in which students should be attentive to the welfare of individuals in cases in which:
  - Requiring printed instructions/information on questionnaires that explain the use of the data for coursework and include the name and contact number of the instructor
  - Requiring, whenever 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 destruction of 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

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### **Student’s Responsibilities and Informed Consent:**

When information is collected for a class project that does not meet the definition of research (as defined by the federal regulations) and does not require approval by the IRB, it is still important to “inform” the participants about the class project, whether posted as an email message or presented verbally in person. Make sure the participant is told:

- The identity of the student collecting data. (This may not always be necessary, as many students enlist the help of friends or family to collect data for a class project.)
- They must be at least 18 years of age to participate.
- It is a class project. (Give a little information, e.g., This is for my business class, I am trying to see if there is a relationship between X and Y.)
- What they will be asked to do (“I would like to ask you some questions about why you chose to attend this University. If there are any questions you don’t want to answer, it is fine to skip them.”).
- How long the interview, survey, etc., may take to complete.
- What will happen to the information collected (“The information will be used to write my paper for the class, and I will give a presentation in class. All of my notes, surveys, etc., will be destroyed when the project is completed.”)
- If they will be identified: examples: “I will not write your name on my notes”; “Do not write your name on the survey;” “I will not use your name in my paper.”
- The student’s and instructor’s contact information if they have any questions (provide phone number/email).