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 a class project.

Federal regulations and university policies require IRB approval for research with human subjects. This applies whether faculty or students conduct research. However, many class projects are conducted for educational purposes and not as research, and thus, do not require IRB approval.

IRBs cannot approve research retroactively, therefore if there is any doubt, please consult with the IRB or submit an application for review.

When a project includes human subjects, the following are considered human subjects research that require IRB review and are NOT class projects:

- Undergraduate theses.
- Theses, dissertations, research papers, and capstone reports presented to the graduate school for partial fulfillment of degree requirements.
- Any project, including class projects, which involves systematic collection of human subjects data, even if falling under an OHRP exempt category.
- Funded research.

Class projects that are designed solely with the objective of providing students with training about and experience with research methods are not considered research. Class projects are for skill development purposes only and are conducted in fulfillment of a class assignment that is typically initiated and completed within a single term.

IRB review is not required for class projects when all the following apply:

- The project is limited to surveys/questionnaires/interview procedures, and/or observation of public behavior (no participant intervention occurs).
- Participants are not a protected population (see provided examples).
- Survey or interview questions do not include sensitive information (see provided examples).
- Surveys are anonymous and include less than 25 participants.
- Survey links are not posted to social media or other online sources.
- Participant recruitment is limited to friends, family, classmates, or publicly available resources.
- Interviews are not video recorded.
- Results are shared in class, but will not be presented publicly (honors theses, websites, social media sites, blogs, conferences, journal articles, etc.).
- No incentives are provided for participation.
- Surveys and interviews include a consent process (see sample template).
- Project documents (surveys, consent form, etc.) do not portray the class project as research to participants or other involved individuals (example: this survey is for a class project).
- All data are destroyed at the end of the course/class project.

Any class project involving protected populations or sensitive information requires IRB review and approval.
Protected Populations – examples include but are not limited to:

- Children/minors under the age of 18.
- Prisoners (including probationers or those whose liberty is otherwise restricted) or analysis of non-publicly available secondary data that includes a prisoner or probationer population.
- Persons with diminished capacity to give consent, individuals requiring the consent of a Legally Authorized Representative (LAR), or those who are wards of the state, or any other agency, institution, or entity.
- Pregnant women.
- Fetuses and products of labor and delivery.

Sensitive information – examples include but are not limited to:

- Information relating to an individual’s psychological well-being or mental health.
- Information relating to sexual attitudes, preferences, or practices.
- Information relating to the use or past use of alcohol or drugs.
- Information relating to illegal behavior.
- Information that if released could reasonably place the individual at risk of criminal or civil liability or be damaging to the individual’s financial standing, employability, or reputation.
- Information that would normally be recorded in a patient’s medical or educational record and the disclosure could reasonably lead to discrimination, stigmatization, etc.

Instructors/students who are unsure of whether a proposed class project involves a protected population or sensitive information should contact the IRB prior to project start.

Instructor Obligations

Instructors must meet with students as soon as possible and go over these guidelines to determine if the proposed class project is research. If there is even the remote possibility that a class project may fall under the definition of research, instructors are advised to submit a human subjects review application with the student to the IRB. Remember, class projects that involve protected populations or sensitive information require IRB review and approval.

If the class project meets the definition of research:

- The instructor should assist the student in preparing the appropriate human subjects review application.
- The instructor should ensure the student has completed the necessary CITI training and obtained the required signatures prior to the submitting the application. Please refer to the PI eligibility policy.

If the class project does not meet the definition of research:

- It is the responsibility of the instructor to ensure that the student project does not meet the definition of human subject research.
• It is the responsibility of the instructor to ensure the class project is conducted according to ethical standards.
• Remember that from a participant’s viewpoint, giving out personal information does not differ for a class assignment or a research project. Personal information is personal information.
• Instructors should advise students that data from human subjects should not contain any personal identifying information whenever possible.
• Instructors should ensure that the project is being identified as a class assignment/project. Labeling the class project as “research” is inaccurate and misleading to participants.
• Students should inform participants that data will be destroyed after the assignment or class project is completed.
• All class projects must include informed consent language that closely follows the guidelines. Information on what to include in a consent form/script is described below. For an online survey, this would be the first page of the survey. A sample consent template for class projects is also available on the IRB website.
• The IRB is available to give feedback on any proposed class project. Remember, the IRB cannot retroactively review projects. All data collected from class projects must be destroyed at the end of the class and cannot be used for publication or presented outside of the class.

**Informed Consent**

When information is collected for a class project that does not meet the definition of human subjects research and does not require approval by the IRB, it is still important to provide an informed consent to the participant. Informed consent for class projects should include the following:

• The identity of the student collecting data and course instructor (ex: My name is Juan Martinez, and I am a student at Southern Illinois University Carbondale. I am enrolled in XXXX course with Dr. Sally Johns).
• Participants must be 18 years of age to participate.
• This is a class project/assignment for the purpose of ___ (provide a little information on the reason and project, e.g., this is class assignment for my business class, I am learning how to collect consumer opinion data).
• What the participant will be asked to do and for how long (ex: participants will complete a 10-minute online survey).
• A statement that the participant may withdraw at any time or skip any questions they do not wish to answer.
• What will happen to the information collected (ex: the information will used to write a class paper, and I will give a presentation in class after which all my notes, surveys, etc. will be destroyed. No information will be shared outside of the class setting.).
• If the project is anonymous or confidential (ex: 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).
• Contact information for the student and the instructor, including phone numbers and an email address.

We would like to acknowledge the use of IRB guidelines on class-related projects from Northwestern University, University of Michigan, and Midwestern State University.