

# IRB Guidance for Student & Faculty Research at DMACC

**DMACC** requires that Institutional Review Board (IRB) approval be obtained for human subject research conducted at the college. Student research conducted that reaches beyond the classroom via publication, presentations, or additions to other published studies are subject to **DMACC IRB Review Guidelines**.

**IRB Research review** at DMACC is generally limited to supporting education of students or educational processes in the classroom, honor's projects, master's theses, doctoral dissertations, and collaborations with other post-secondary institutions. DMACC is not a research institution and does not support providing IRB services for commercial or private use unless there is a benefit to DMACC students.

**IRB Review** is usually required if the activities involve research (*defined as systematic inquiry or investigation in order to discover or revise facts, theories, applications, etc.*) on Human Subjects, be it through direct interactions, or the activity requires using personal, identifiable data about them. Failure to obtain IRB review and approval may threaten the use of the data, the project, grades, as well as open the College to potential vulnerability of legal reprisal. Retroactive IRB Review and Approval after the research has been conducted is not an option. Please err on the side of caution and submit an application if there is any doubt.

**IRB Review** becomes a concern **when a project involves collecting or studying personal data on any individual, or interacting with any protected classes of human subjects, or could potentially compromise any individual's privacy/confidentiality through any resulting findings acquired - AND - the findings are used for publication or to expand public knowledge. While IRB review may not be required on many class assignments, ethics in research should be prominent in faculty/student discussions and decisions on potential projects.**

## What is Not Human Subjects Research, General Thoughts

**Classroom Assignments/Projects** that are required for training and education, often completed in a single term, designed for experience in technique, and/or designed to provide students experience, generally are not considered to meet the federal definition of Human Subjects research. No data collected are personalized, identifiable, or stored or used for publication outside of the classroom assignment. **If the research is ever expected to be expanded on or used to share publicly (either verbally, through a web site, conference, or publication of any kind) it will then be considered to add to the public body of knowledge and subject to (US code 45 CFR 46102(f)) Human Subjects Research IRB Review and Approval.** This would include graduate level Theses.

## To Further Clarify

Projects that are conducted for instructional exercises specific to the class (practicums, experience in methodology) and are not expanded beyond the class, not publicized, posted, or stored for future use by others, are generally not subject to IRB approval. Generally this includes classroom activities, practicum experiences, or assessments conducted for educational, administrative, institutional, or classroom improvement. In addition, information gathered where the questions focus on things, products, policies or opinions, is not considered Human Subjects Research. Data collected through observation of public behavior in public places, where there is no interaction or intervention with subjects and the behavior being observed is public, is not considered Human Subjects research. Research conducted in the collection and or analysis of data from public records is not considered Human Subjects Research. **It becomes questionable** when the activities include collecting data on individuals, interacting through interventions with individuals, human subject inquiry on sensitive topics/issues, and using those data for analysis or reflective papers or presentations. At any time, data collected from **Protected Classes: minors, pregnant women, elderly, prisoners, persons with intellectual disabilities, persons with physical disabilities, economically disadvantaged** IRB approval is required.

**It is important to note that even when IRB Review and Approval may not be required, managing the ethical concerns of confidentiality, deductive disclosure, coercion-free recruiting, informed consent, and projects that include potentially vulnerable individuals (protected classes) are to be seriously considered and appropriate dialogues should be conducted between faculty and their students. Do no Harm.**

## COMMON ILLUSTRATIONS

*The following list addresses general examples of IRB Review requirement scenarios. It is meant to be used as a guide. It is **NOT** comprehensive. If there is a doubt, then IRB Application and Review is recommended:*

<p>Generally, <b>IRB Review is required:</b></p>	<ul style="list-style-type: none"> <li>• If human subjects are involved either directly or through use of identifiable data about them</li> <li>• If human subject observational data are collected in areas that individuals can assume a certain level of privacy (<i>locations where a person can reasonably expect that no observation or recording is taking place</i>)</li> <li>• If data are collected from or through interaction with individuals in <b>Protected Classes: minors, pregnant women, elderly, prisoners, persons with intellectual disabilities, persons with physical disabilities, economically disadvantaged</b></li> <li>• If data collected are recorded in such a manner that human subjects can be identified, directly or through identifiers linked to the subjects (<i>This includes photographs or personal artifacts</i>)</li> <li>• If human subjects' survey responses could place them at risk of mental or physical harm, criminal or civil liability, or be damaging to their financial standing, employability, or reputation</li> </ul>
<p>Generally, <b>IRB Review is not required:</b></p>	<ul style="list-style-type: none"> <li>• If observational data on human subjects is collected in public places</li> <li>• If journalist interviews are conducted (<i>journalistic ethics guidelines prevail</i>)</li> <li>• Class projects/assignments/practicums involving secondary data analyses that are assigned and conducted as educational exercises - <b>AND</b> - the data provided have no individual identifiers or potential linkage to identifiers, or the data are public and the purpose is instructional, an educational exercise, or professional development</li> <li>• Class projects/assignments/practicums completed in a semester that involve human subjects e.g., in person, via email/mail, surveys, telephone, etc. where the purpose is instructional and findings are not shared beyond the classroom</li> <li>• Research is conducted on educational practices within <b>DMACC</b> for internal improvement of teaching and learning and not presented publicly or published</li> </ul>