

## **IRB Policy Re: IRB applications done by students as course assignments.**

IRB applications done by students as course assignments can be problematic for several reasons and this is a recurring issue for most academic IRBs. This memo provides information and guidance to Cal Poly Humboldt instructors on this topic. These considerations are most relevant to research methods courses in the social sciences. Please contact the IRB if you would like to discuss this issue further.

### General Comments:

IRB applications should generally be used for research that is intended to contribute to generalizable knowledge and not research exercises done as course assignments. This is consistent with the IRB's mandate and workload capacity. Human subjects research done as a learning exercise for a course assignment poses several challenges for the IRB and for faculty supervisors, including:

- Course instructors serving as research supervisors on numerous IRB applications from their classes may not be able to provide the oversight necessary for the development of each application, resulting in deficient applications that need revisions.
- When revisions are required by IRB reviewers the timeline for approval becomes unpredictable.
- One semester is often insufficient time for students and their supervisors to design a study, complete IRB review, and conduct the study.
- The responsibilities of research supervisors continue as long as the study does and do not end with a course. These responsibilities include ensuring that approved methods are followed and adverse incidents are reported promptly (please see IRB application section, 'Responsible Faculty or Staff Member Assurances').
- Since the IRB has limited reviewing members it may not have the capacity to review all applications from a course within our target of 10 business days after submission.

### Guidelines:

1. Our IRB policy allows for the following exception for research done as a course assignment: "This policy does not cover classroom assignments provided that all data collection and dissemination activities for the assignment are restricted to that classroom." So when these conditions are met, no IRB application has to be submitted.
2. If your course research assignment requires data collection from subjects outside the classroom, the exception from IRB review may still be granted in limited cases if it is determined to not meet the definition of research as specified in Humboldt's IRB policy (<https://irb.humboldt.edu/irbpolicy>). The project must meet all of the following conditions to be excused as 'not human subjects research':

- The project is intended solely as a learning exercise; and
- Results will never be shared outside of the class; and
- Results will never be used in any way other than as a course assignment; and
- There are no activities for which consent would normally be required; and
- The procedures would not reasonably be considered to constitute a systematic investigation; and
- The procedures involve no foreseeable risks to participants; and
- No information is collected that could be used to identify a participant

Even in these cases we consider the Belmont Principles to apply and ask instructors and students to consider their responsibilities under the Belmont Principles (such as obtaining informed consent) in these course research projects.

3. If results of research done as a course assignment are intended to be publicized outside of the classroom, these exceptions cannot be granted, and IRB approval has to be obtained. For reasons explained above, that can be problematic for large classes where students are required to do independent research projects. In these cases, combining groups of students on single projects can be a helpful strategy.