

University at Buffalo SBSIRB Policy on Academic Exercises Designed for Teaching Students Research Techniques

Research as defined in the Code of Federal Regulations and conducted by any member of the University at Buffalo community is subject to federal regulations which require that all research protocols involving human subjects be reviewed by an Institutional Review Board (IRB) for the protection of Human Research Participants. However, these regulations allow certain types of course-related studies to be exempted from IRB review. The purpose of this policy is to clarify when student research projects and activities must be submitted to the SBSIRB for review. While the SBSIRB understands that the best circumstances for learning to conduct research are those that closely resemble situations that would be faced if actually carrying out a research project, we must stress that this type of real world experience will often require the same real world protections for human research participants.

Research is defined as any systematic investigation, including research development (pilot testing), designed to develop or contribute to generalizable knowledge.

Generalizable knowledge refers to any systematically gathered data which is intended for dissemination beyond the institutional setting (e.g., program evaluation research for internal use does not usually need review), and which might reasonably be generalized beyond the research sample.

A **human subject** is a living individual about whom a researcher (faculty or student) obtains data or information.

Research practica (usually in the form of course-related research projects and/or directed studies) are designed to provide students an opportunity to practice various research methods. These methods may consist of interviews, observations, survey techniques, measurements of behavior and data analysis. Typically such projects are quite limited in scope, do not lead to generalizable knowledge and are not undertaken with that goal in mind. For example, a student may interview a peer when the interview does not involve any sensitive or personal information. These "classroom exercises" and are not typically subject to review by the SBSIRB unless the student researcher or instructor anticipates publishing the results or presenting to a larger body of individuals such as at a professional meeting or departmental colloquium.

The following **rule of thumb question** can be used to help determine if a project is research or if it can be considered research practica:

Is the information gathered likely to be used for publication or presentation outside of the class (Research) or is it intended to be used solely as an educational exercise (Practica)?

While the IRB recommends that practica projects not put the subjects at more than minimal risk, not involve sensitive topics, and that any data be recorded anonymously by the students (i.e., with no names, social security numbers, or any other codes that can be

linked to a list of names), the actual implementation of practica is left to the discretion of the instructor.

Sensitive topics include but are not limited to:

1. Sex or Sexuality
2. Death including suicide
3. Drug use of any type
4. Drinking alcoholic beverages
5. Violence or violent acts
6. Failure and inadequacy
7. Depression
8. Illegal Activities
9. Topics which could cause emotional distress
10. Topics which could lead to civil or criminal liability

Potential Practicum Problems. Students engaged in the process of learning research techniques understandably want to focus on compelling or real-life issues. In the process of reviewing student research, however, the SBSIRB has found topics and subjects that raise concerns for the well-being of the subjects and the students themselves. Projects which would place either the students conducting the research or their subjects at risk if confidentiality were breached, and those with children as subjects, need to be constructed with special care. Projects conducted in hospitals or other health care facilities must also be designed to not violate federal health care privacy regulations (HIPAA) that are overseen by the SBSIRB.

While practica are not under the purview of the SBSIRB, the staff of the SBSIRB are available for consultation with students and for class presentation regarding issues of the protection of the rights and welfare of human subjects. It is important to note that **data collected as practica cannot be used at a later date** for presentation at conferences, publications, or doctoral dissertations and will not be approved by the SBSIRB for use in any such way. Students are therefore encouraged to apply for IRB approval of practica projects if there is even a remote chance that the practicum project could morph into a genuine scholarly product such as a thesis.

Research Projects, Directed or Independent. Any research conducted by students, graduate or undergraduate, that does not fall under the definition of a research practicum, which uses human beings as subjects, and which is intended to contribute to generalizable knowledge, **must** be reviewed and approved by the SBSIRB. This includes, but is not limited to, all independent undergraduate research projects and honors theses, masters' theses and Ph.D. dissertations.

Recognizing the time constraints imposed on research projects that must be begun and completed within a single semester, the SBSIRB will make every effort to work with instructors to process proposals promptly. However, instructors must plan for and allow adequate time for the review process to occur (approximately a week to a month, depending on the particular human subjects issues raised by the proposed research). The

later in the term a proposal is received, the more difficult it will be to accomplish the review in time for the projects to be completed during that current semester. It is very strongly urged that instructors submit proposals within the first three weeks of the semester for projects that must be completed during a current semester. In some cases, when students in a course are all using similar methods of recruitment and data collection, instructors may submit an aggregate proposal.

Like all submittals to the SBSIRB, student research projects will be reviewed on a rolling basis and may qualify for expedited or exempt review procedures if risks to subjects are no greater than minimal and meet other federal criteria.

Responsibility of Student Advisors for all Student Research Projects.

- Faculty advisors of both undergraduate and graduate students working with human subjects must be certified to conduct research with human subjects, even if they are not currently conducting research with human subjects.
- Certification to conduct research with human subjects is attained by completing the educational requirements defined by the University Human Research Protection Program listed on the IRB websites.
- It is the responsibility of faculty advisors to determine when an undergraduate or graduate student project does not meet the definition of a practicum and must be reviewed by the SBSIRB. However, the advisor must be certified as noted in the previous bullet to be authorized to make this decision.
- It is the responsibility of faculty advisors to ensure that research practica are conducted according to the legal and ethical standards of the relevant discipline. This may include the use of a written consent form, debriefing, confidentiality procedures, and other practices that would be appropriate if the exercise were a research study. The SBSIRB staff will be happy to assist in the education of students for this purpose by giving class presentations on the ethical standards of research with human subjects.
- When student research activities are not practica, it is the responsibility of faculty advisors to assist students in preparing review materials for the SBSIRB and to ensure that the research is conducted in accordance with UB's agreement with the federal government (the MPA) and with applicable university policy.