IRB Standard Operating Procedures

SOP#: 12 Title: Faculty Use of Their Own Students in Effective Date:

Revision#: Research

study qualifies under an Exempt category.

PI must comply with Family Educational Rights and Privacy Act (FERPA) and get signed authorization to use FERPA protected information for research purposes. FERPA authorization is not required for directory information that is publicly available and thus not directly collected from the student subjects. The NEIU Registrar has final authority over FERPA protected data use. The IRB cannot override a final decision by the Registrar.

RESPONSIBILITIES IN DATA COLLECTION

The recruitment and/or consent process will be conducted by someone who does NOT have a status and/or classroom relationship with the potential subjects. The faculty member cannot recruit and/or gain consent.

Research with one's own students presents unique considerations with regard to human subjects protections. At the center of the issue is the inherent power difference between student and faculty. Regardless of how well a faculty member presents the recruitment and option not to participate, students may feel as though they have to participate or risk having their non-participation impact their grade or relationship with the faculty. In addition, the idea of ongoing voluntary participation is a potential issue if a student intends to enroll in another course with the same faculty or decides she/he/they wants to discontinue participation after initially consenting. Real coercion is rare, but the perception of coercion can be just as problematic in obtaining voluntary informed consent.

Regardless of intentions, a faculty member's use of their own students in research poses significant ethical issues, creates potential risks to research participants due to the inherent conflict of interests or conflict of commitment situation, and raises the issue of voluntariness. At the same time, the IRB recognizes that there are a few times when this is the only viable option available in order to obtain reliable data. When faculty propose to conduct research with students as subjects, sampled from their own classrooms or other faculty-sponsored associations, the potential for coercion or undue influence increases and additional protections are required. In many cases, the involvement of a neutral third party may be an effective way to address perceived coercion or undue influence.

Avoiding Unintentional Coercion or Undue Influence in Classroom Settings

Many research activities can be similar to or overlap with normal coursework or class projects. It is the researcher's responsibility to ensure that students can truly understand what research participation involves and can distinguish voluntary research activities from required course activities. There are many variations to using this approach depending on the timing and procedures involved. Here are some examples of processes that can help minimize coercion of undue influence:

Examples for Avoiding Unintentional Coercion or Undue Influence in Classroom Settings

Example of Conducting Research and Soliciting Enrolled Students for Participation:

Data will be collected from students in a targeted class through an anonymous survey (no names or other identifying information will be included). At the end of a class period, the faculty introduces a third party. The faculty member leaves after the third party is introduced. The third party discusses the study with the students, provides consent forms, answers any questions, and then begins to collect data. The third party will collect signed consent forms and keep them in a locked file cabinet until after the class grades have been posted. If data is collected electronically, it is the responsibility of the researcher and the research team to ensure data is collected anonymously or confidentially and not linked to electronic consent forms. The data will not be analyzed until all grades have been posted. Using this process, the students can be assured that the faculty does not know who provided which survey and who did or did not participate.

Example of Action Research and/or Research with Identifying Information and/or Qualitative Data Collection:

A faculty proposes to use typical student work products which includes identifying information (e.g., assignments, papers, interviews, etc.) as research data. If data is collected electronically, it is the responsibility of the researcher and the research team to ensure data is collected anonymously and not linked to electronic consent forms. Documented (signed) consent forms need to be collected by a third party from students who are willing to provide their data for the study. The third party will present the study to the

class and answer questions. The third party will collect signed consent forms and keep them in a locked file cabinet until after the class grades have been posted. After course grades have been posted, the faculty researcher can access the consent forms and collect and analyze only the work products of those students who have given permission to use their data in the study. Again, in this process the students can be assured that their participation, or lack thereof, has no impact on their grade or their relationship with the faculty.

Example of Experimental Action Research and/or Program Evaluation:

A faculty proposes to use data from student work products with or without identifying information (e.g., papers,ipmojects, quiz8 535fe s6.6(A)7(hout)n -0tud6 Td [cn 38.5,s810.5(t)-6.6(ict)-6.6(,)-6.6((q)-11.2(ui)2)3(ues)8

discretion. This IRB SOP remains in effect until such time as the Responsible Officer calls for review. Requests for exception to any portion of this policy, but not to the policy statement, must be presented in writing to the Responsible Officer.