Office of Research Compliance (ORC) Guideline on Internet Research with Human Subjects

Introduction

This guideline details the ORC recommendations for the conduct and review of Internet research with human subjects. The University, its faculty, and its trainees have a common interest and a shared responsibility to ensure that Internet research is appropriately reviewed, conducted, and shared.

Scope and Requirements

The vast amount of information potentially available has made the Internet an important tool for investigators. Investigators can potentially collect data from widely dispersed populations at relatively low cost and in less time than similar efforts in the physical world. However, the problem of limited communication channels can severely limit this potential. For example, investigators could unknowingly involve protected populations or cognitively impaired subjects in the research study or fail to detect and respond to distress. There are also online data integrity issues to consider.

The term Internet research encompasses research on the topic of the Internet, recruiting participants via the Internet, research collecting data over the Internet, observations of human behaviors on the Internet, or some combination of these aspects.

Tips for Investigators

In designing studies that use the Internet as a research tool, investigators should have a plan for:

- Obtaining and verifying informed consent, if required
  Typically investigators will request a waiver of the signature requirement for informed consent. There are appropriate consent form templates available on the Office of Research Compliance website and investigators are encouraged to use templates.

- Maintaining the promised degree of privacy of subjects
  Privacy refers to individuals' right to have control over access to themselves and their information. When studying information that is already existing online, investigators should give consideration to whether or not the participants would have a reasonable expectation of privacy.

- Maintaining confidentiality of information through the use of appropriate security measures
  Confidentiality refers to how information that is obtained from individuals is protected. An inappropriate breach of confidentiality is the primary source of risk in most online studies. Technology can provide reasonable security but cannot guarantee absolute security. The level of security required is directly related to the sensitivity of the data through the use of appropriate security measures.

- Appropriate online data collection method and data validation checks

- Avoiding deception or other protocols that might require debriefing and debunking

Tips for Reviewers

In evaluating studies using the Internet as a research tool, the IRB should ensure that investigators have a plan for:

- Obtaining and verifying informed consent, if required;

- Maintaining the promised degree of privacy of subjects and confidentiality of information through the use of appropriate security measures; and

- Appropriate online data collection method and data validation checks.

Recruitment Issues

Participants may be recruited for Internet studies using a variety of methods or platforms, including but not limited to:

Emails to Qualtrics or other survey platforms

MTURK

Psychology Pool

Marketing Pool

The IRB will need to review the information that will be provided to participants in recruitment efforts. This can be provided as a screenshot. Additionally, the IRB will need to know the details of how the recruitment

will occur (e.g., a Facebook posting, a webpage, etc.). In general, recruitment materials should list major inclusionary criteria, important aspects of the study, and how the participants should proceed if they are interested in participating. If participants will be compensated in the study, the compensation cannot be the primary focus of the recruitment materials (e.g., cannot be the biggest and/or boldest font on the recruitment material).

Compensation and Proration

Federal regulations require that participants be free to discontinue participation at any time without penalty or loss of benefits to which the subject is otherwise entitled (45 CFR 46.116(a)(8)). When participants are compensated for participation, with money, course credit, or other items of value to the participant, proration of compensation must be considered, especially if participation is likely to last longer than 30 minutes or repeated waves of data are solicited. Problems with undue influence might occur, for example, if the entire payment is contingent upon completion of a longitudinal study. For Internet data collection, the researcher needs to consider how a participant can skip individual questions or discontinue participation and still obtain credit/compensation.

Participation by Minors

In online research, it is difficult to ensure that participants are not minors. This may include the investigator requiring participants to assert that they are 18 years of age or older. If minors are included in the target population, some clear mechanism to obtain parental consent is required. Because there is no fool proof method of ensuring that minors do not participate or for ensuring parent's consent, some research may not be appropriate for the Internet.

Qualtrics

Qualtrics is an online survey research platform that many investigators use to collect data via the Internet.

In Summary:

The Internet is a powerful tool for investigators conducting research. With appropriate study design that considers important considerations of consent, protection of privacy, ensuring confidentiality, etc., the investigator and the IRB can ultimately agree on a study in which the potential benefits outweigh the potential risks.

References:

Documentation from the University of Virginia was used to help create parts of this guideline.

Ohio University Institutional Review Board Guidelines, July 1, 2016

"Institutional Review Board Management and Function" by Elizabeth Bankert, Robert Amdur

"Considerations and Recommendations Concerning Internet Research and Human Subjects Research Regulations, with Revisions", approved at SACHRP meeting on March 12-13, 2013