

University Students as Subjects: Ohio University IRB Guidelines for Ohio University Researchers

Purpose: The Ohio University Institutional Review Board considers university students to be potentially vulnerable subjects. Power differentials between faculty and university students require that investigators should take care to avoid the potential for students to feel pressured to agree to participate in research.

Scope: This guidance applies to all studies that meet both the federal definition of “human subject” and “research” that involve Ohio University students as potential subjects. If you’re not sure if your study meets these definitions, such as Action Research in the classroom, please contact the Office of Research Compliance at compliance@ohio.edu.

Definitions:

- *Human subject* means a living individual about whom an investigator (whether professional or student) conducting research:
 - (i) Obtains information or biospecimens through intervention or interaction with the individual, and uses, studies, or analyzes the information or biospecimens; or
 - (ii) Obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens.
- *Research* means a systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge.

Research participation must always be voluntary. The student-teacher relationship raises the issue of volunteer participation. Students may agree to participate in the belief that doing so will place them in a favorable situation with faculty (e.g., a better grade, good recommendations, employment possibilities), or that failure to participate will negatively affect their relationship with the investigator or faculty (e.g. a lower grade, less favorable recommendations, being "uncooperative").

Non-Coercive Recruitment: Solicitation of volunteer student subjects for research must be done in a non-coercive manner. To avoid undue influence, subjects should be recruited by a general announcement or central posting/announcement mechanism that includes a clearly written description of the project and statement of the proposed student participation. Individual students should not be targeted for recruitment based on an instructor’s prior knowledge of their backgrounds or personally identifiable information.

Consent & Data Collection: To minimize undue influence, instructors should arrange to have a different member of the study team conduct the informed consent process for prospective subjects who are their current students. The informed consent process includes any opportunities for prospective subjects to ask questions about the research project. This other study team member should obtain and hold any signed consent forms while the course is in process. The other study team member’s contact information should be included in the consent form to give subjects a point of contact who is not the instructor. In a project that will link identifiers to research data, instructors should not know which students agreed to participate and should not have access to any resulting identifiable data until after grades have been assigned and entered.

Research participation in a specific project cannot be a course requirement. It is especially important that researchers strive for clarity when explaining what research activities would be involved for projects in which university students are the targeted participants.

Be Clear About What You Are Asking Students to Do: If the “research” element of your project only involves asking students for their permission to use their course materials (including grades), then please explain that in the recruitment materials and consent form and clearly indicate that no additional time or activities would be required of students. If the project involves extra activities in addition to the use of assignments and/or grades as sources of research material, then explain that. If the research project is not related to the class activities at all, then explain that.

Course Credit or Extra Credit: If students would earn course credit or extra credit through research participation, they should be offered an equivalent alternative assignment that does not require them to sign up to be a research subject. Courses which require students to earn credits in a research subject pool must also meet this requirement. If a researcher wants to ask another instructor’s students to be subjects and to offer them extra credit for research participation, they should be able to document the other instructor’s agreement to that plan. Consent forms should clearly explain what activities student subjects must complete in order to earn the course credit or extra credit.

Students’ Right to Withdraw: As with all research subjects, student subjects must be allowed to withdraw from a research study at any time without penalty. If you wish to retain and analyze data obtained from subjects who withdraw partway through a project, please inform them of this plan in your consent form.

Be Forthcoming: Excepting deception research projects (that have very specific criteria for IRB approval), you must explain to prospective student participants in a consent form what your study is about and what information you would collect from them through research procedures. This requirement *does* apply to research being conducted in normal educational settings; that is, you cannot expect to reuse students’ grades/course assignments as sources of research material without their express documented permission.

FERPA: Per the OU Office of Legal Affairs, investigators wishing to use students’ grades/course assignments as sources of research material should generally expect to be required to obtain students’ documented permission in order to comply with the Family Educational Rights and Privacy Act (FERPA). Even if you have access to this information and/or materials in your role as an instructor, the OU Office of Legal Affairs does not construe such access as blanket de facto permission to reuse it for research purposes without students’ consent. The Office of Research Compliance reserves the right to refer any protocols referencing the use of and access to FERPA-protected information for research purposes without students’ documented consent to the OU Office of Legal Affairs. Generally, OU FERPA and IRB requirements are met if a student signs a consent form to participate in a study and authorizes release of their educational records for research purposes.