

## CWU Guidelines for Student Research and Class Projects

Research as defined in the Code of Federal Regulations (CFR) and conducted by graduate and undergraduate students at Central Washington University (CWU) 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 Subjects in Research (locally designated as the Human Subjects Review Committee or HSRC). **The purpose of these guidelines is to clarify the difference between student projects or class activities that do not require review by the HSRC and student research, which *does* require HSRC review.**

**What is research?** 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 instructional setting 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. (Refer to “Potential Practicum Problems” below for a specific example.)

### Research Practica

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 such as interview, observation and survey techniques, measurement of behavior (e.g., reaction time, speech, problem solving) as well as 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, personal information. (See “Potential Practicum Problems” below for a specific example.)

Such projects should not put the subjects at more than minimal risk, and the data must be recorded anonymously by the students (i.e., with no names, social security numbers, or any other codes or demographic information that can be linked to a list of names). These projects are considered "classroom exercises" and are not subject to review by an IRB. They do not require review unless the student researcher anticipates publishing or distributing the results outside of the classroom or presenting at a professional meeting (e.g. Symposium on Undergraduate Research and Creative Expression (SOURCE), Parents and Teachers Association (PTA), American Psychological Association, etc.). **In this case, the student researcher must make application to HSRC for exemption or for HSRC review.**

**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 HSRC has found topics and subjects that raise concerns for the well-being of the subjects and students themselves.** For example, asking the survey question, “Are you aware of the services provided by Planned Parenthood of Kittitas County?” poses little-to-no risk to the subject. Asking the question, “Have you ever used the services of Planned Parenthood of Kittitas County?” becomes probing and personal, and presents special concerns. Projects collecting data about illegal activities, those which could cause emotional distress in the subjects, those which would place the students at risk if confidentiality were breached, and those with children as subjects need to be constructed with special care.

Similarly, when students wish to do their data collection off-campus, potential risks can increase. The HSRC recommends that faculty sponsors consult with HSRC staff to ensure ethical and safety standards are met and appropriate cooperative agreements are obtained.

While practica are not under the purview of the HSRC, the HSRC staff are available for consultation with students and for class presentations regarding issues of the protection of the rights and welfare of human subjects. **It is important to note that data collected as practica *cannot* at a later date be used for presentation at conferences, publications, or doctoral dissertations.**

## Research, 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 IRB. This includes, but is not limited to, all independent undergraduate research and honors theses/projects, undergraduate directed research (e.g., SOURCE), masters' theses/projects and dissertations. Pilot studies, pretests, and other "preliminary" investigations are considered research, and must be reviewed unless they fall into one of the following categories:

- a. accepted and established service relationships between professionals and clients where the activity is designed solely to meet the needs of the client;
- b. research using only historical documents; or
- c. research using only archaeological materials or other historical or prehistorical artifacts.

Recognizing the time constraints imposed on research that must be begun and completed within a single quarter, the HSRC will make every effort to work with instructors to process applications promptly. However, instructors must plan for and allow adequate time for the review process to occur (approximately nine days to one 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 research to be completed during the current quarter. **It is very strongly urged that instructors submit proposals within the first three weeks of the quarter for research that must be completed during the current quarter. In some cases, when students in a course are all using similar methods of recruitment and data collection, instructors should submit a [Request for Course Project HSRC Exemption](#), preferably before the quarter the student research is to begin.**

**Exemptible student research must be submitted to the HSRC for consideration under the exempt category.** Student research may be considered exempt if it meets federal exemption criteria such as research involving the use of educational tests (cognitive, diagnostic, aptitude, achievement), survey procedures, interview procedures, or observation of public behavior in which data is collected anonymously (i.e., with no names, social security numbers, or any other codes or demographic information that can be linked to a list of names) or otherwise qualifying under exemption category 2 of the federal regulations. Special regulations apply when vulnerable populations are used in research. For example, surveys, interview procedures or observations of public behavior involving children are not exempt research except for research involving observation of public behavior when the investigator does not participate in the activities being observed. Because of special regulations, it is recommended that the researcher consult with the HSRC administrator when considering the use of vulnerable populations such as children in their research.

Refer to the following link for a complete listing of the federal exemption categories:  
<http://www.hhs.gov/ohrp/humansubjects/guidance/45cfr46.htm> - 46.101

**Non-exempt student research must be submitted for regular IRB review.** Keep in mind that all requests for review of non-exempt research must be submitted at least three weeks before a scheduled HSRC meeting if the research requires full review by the HSRC. The schedule of HSRC meetings is available at [HSRC meeting schedule](#) .

## Responsibility of Faculty Sponsors for all Student Projects/Research

- **Faculty sponsors of both undergraduate and graduate student projects or research must be certified in the Responsible Conduct of Research with human subjects (RCR)**, even if they are not currently conducting research with human subjects. One way of receiving certification is to complete the on-line tutorial available via a link on the HSRC website. (See <http://www.cwu.edu/~hsrc/training.html>) A certificate can be printed on completion of the tutorial. Another method is to attend a two-hour Human Subjects Protection seminar presented by the Human Subjects Review Committee Office during the year. Certificates of Completion are given for these seminars and can be used to verify fulfillment of the certification requirement. **The**

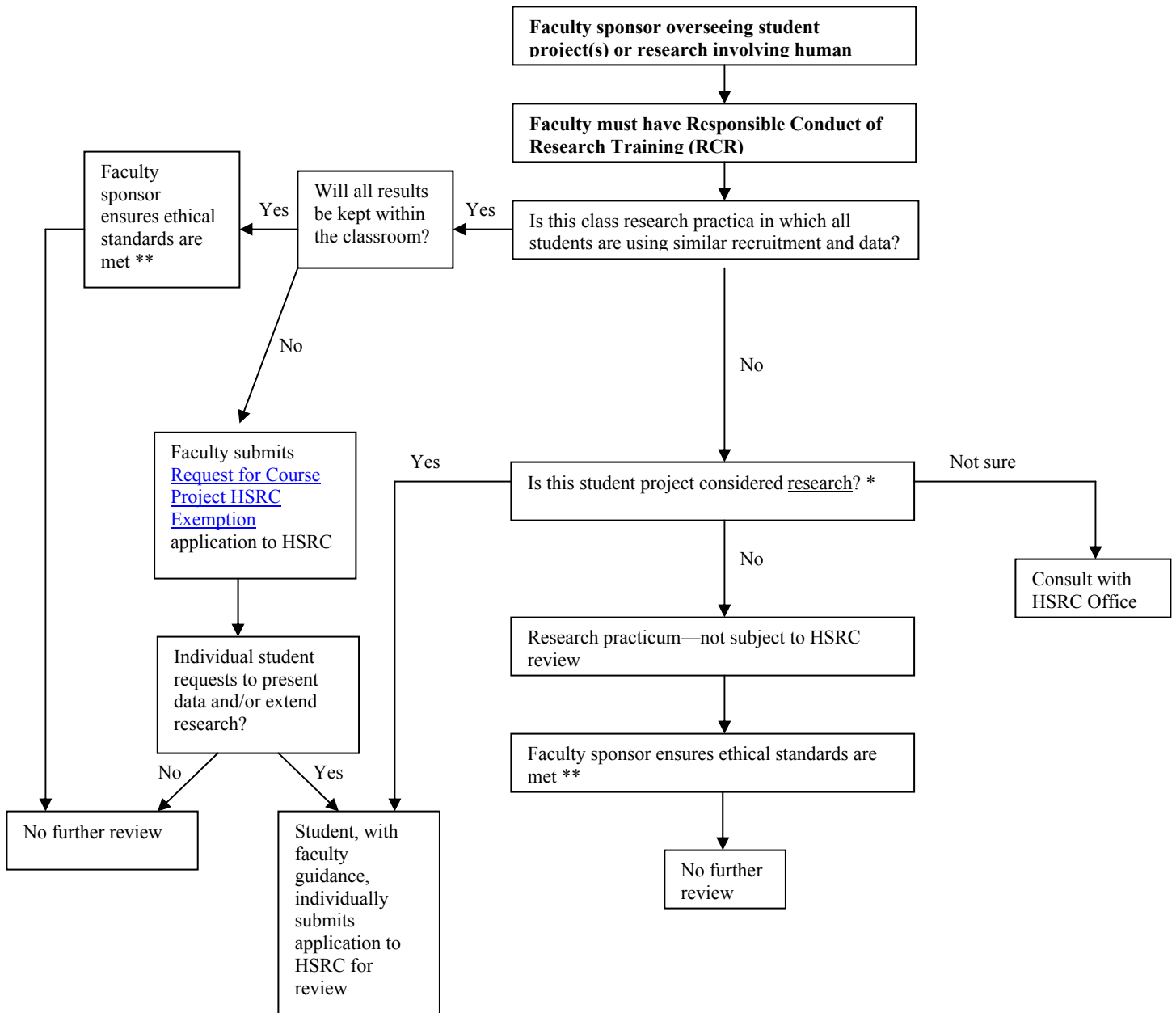
**faculty sponsor is also responsible for ensuring that each student doing *research* (not practicum) involving human participants also completes the RCR training.**

- **It is the responsibility of faculty sponsors to determine when an undergraduate or graduate student project does not meet the definition of a practicum and must be reviewed by the HSRC.** However, the sponsor must be certified as noted in the previous bullet to be authorized to make this decision, and the decision may be made in consultation with the HSRC Office. Instructors planning practica that are designed within some limited parameters are urged to submit an aggregate application, [Request for Course Project HSRC Exemption](#), for the class project in case some data might turn out to be research-worthy.

Approval of such an aggregate application would allow data gathered to be available for possible future use as research. When individual students find they want to present their data or do more research, they must apply for HSRC approval for that study. If no problems are found in the data gathering and ethical treatment of subjects, the study is likely to be approved. If informed consent was not adequate or risks were excessive, or other serious concerns are raised, the HSRC must require that the data not be used. Early consultation with HSRC staff is encouraged to avoid the occurrence of such circumstances.

- **It is the responsibility of faculty sponsors to ensure that research practica are conducted according to the ethical standards of the relevant discipline.** Bypassing review does not mean that the legal and ethical requirements for protection no longer apply. Instead, it is the responsibility of the instructor to be aware of any potential risks to the dignity, rights or welfare of the subjects; make those risks known to the potential subjects; ensure that appropriate informed consent is obtained, and confidentiality is protected; and so on. We strongly suggest that instructors use this occasion to educate students in these requirements, perhaps even convening a model IRB within the class to review proposals. (HSRC staff are available to provide assistance.)
- **When student research activities are not practica, it is the responsibility of faculty sponsors to assist students in preparing review materials for the IRB and to ensure that the research is conducted in accordance with CWU's agreement with the federal government (the FWA) and with applicable CWU policy.** (See <http://www.cwu.edu/~pres/policies/part2-26.pdf>)

## Flowchart to Accompany CWU Guidelines For Student Research and Class Projects



\* Refer to [paragraph two](#) of this document for definition of research

\*\*Suggestions for minimizing risk:

No-to-low risk to subjects; refer to [“Potential Practicum Problems”](#) for guidance.

All subjects at least 18 years old

Project conducted on CWU campus only; refer to [“Potential Practicum Problems”](#) for guidance.

Anonymous data (no identifiers)