Guidelines for use of surveys, interviews, or other forms of data collection in courses in Homewood IRB’s schools

The Homewood IRB (HIRB) is responsible for reviewing all research projects involving human participants conducted in the Krieger School of Arts and Sciences, Whiting School of Engineering, School of Education, Carey Business School, Nitze School of Advanced International Studies, and Peabody Institute. The determination as to whether course activities in these schools that involve collecting information from individuals requires HIRB approval is often unclear. In addition, having students collect information from individuals not associated with a course as part of a course requirement raises a number of issues including the interface with the local community, ethical concerns regarding collection of sensitive information from people, and potentially putting students in inappropriate situations. On the other hand, such activities can be valuable learning experiences for students. This document describes the ground rules for this type of course activity. Faculty members are ultimately responsible for ensuring that the activities conducted in their courses are in accord with these guidelines and are expected to provide oversight to students in their execution.

Three paths are possible when considering conducting research-type activities in fulfillment of academic requirements: individual student projects requiring IRB review; class projects requiring IRB approval; and class projects that fall under the exception to IRB review.

1. Individual student projects requiring IRB review.
   Individual student research projects, such as honors theses and doctoral research, do not qualify for use of the exclusion to submit the class project to the IRB. Individual student research projects involving human research participants that are conducted through independent study or as part of graduate work require the preparation of an IRB application in collaboration with a faculty member.

2. Class projects requiring IRB approval.
   Course projects in which research is conducted with participants through intervention or interaction or use living individuals’ identifiable data and do involve activities that have a goal of contributing to broader knowledge, including publications and presentations.

   Instructors who wish to retain the option of publishing or presenting results of course-related data collection should submit a regular research application to the IRB, with the instructor as PI. The review process is the same as for any other research project. Also, instructors may add the student project as an amendment to their existing protocols if the activity would so qualify.

3. Class projects that fall under the exception to IRB review.
   If the information collected is used only for educational purposes within the course and will not be published or otherwise disseminated, it will likely not qualify as human subjects research and hence does not fall under IRB purview. Information collected may be provided to a collaborating community group for their own use. In general, course activities are instructional in nature and should not involve activities that have a goal of publication – learning how to conduct research is not the same as conducting research. In the past, the IRB has reviewed such proposals but

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typically finds them to lack sufficient development and detail and does not approve them in a timeframe compatible with an academic term. Although students may have the intention of publishing work conducted in a class setting, it is generally unlikely that this will be the outcome for an activity of this kind. Under this exception, all of the following must apply:

- The objective is for students to learn how research projects are designed and conducted.
- Data analysis will occur only for class purposes.
- The proposed student projects are very similar to each other in both content and design.

*Note: If the activity is intended for broader knowledge, including publication or presentation, the human subjects research requires IRB approval before the research is undertaken; approval cannot be granted retroactively.*

**Projects eligible for the class project exception must adhere to the following guidelines:**

- The instructor assumes primary responsibility for ensuring that the rights and welfare of participants are protected and high standards of ethics are maintained. Further, if a class protocol activity is not under the IRB’s purview then it is the individual division/school’s responsibility to have oversight of the class project.
- All instructors must complete the required human participant research training (CITI) module before starting a class project falling under this exception.
- Projects are substantially similar to each other, with only minor variations in content and design. For example, students may conduct survey research by selecting questions from a single large survey instrument.
- Interacting with minors raises a number of complicated issues, including parental notification and those raised in the *JHU Safety of Children in University Programs Policy*. Due to this, students may only draw class project participants from a population of individuals 18 years of age and older and may not include vulnerable populations.
- Projects may not include any personal, sensitive, or incriminating topics or questions that could place participants at risk.
- Projects may not include manipulation of participants’ behavior beyond the range of normal classroom activities or daily life.
- Projects may not involve physically or psychologically invasive contact with participants.
- If participant concerns or complaints arise, the instructor must inform their division/school’s point person for guidance (i.e. Vice Dean for Research, Dean of Undergraduate Education, IRB member).

**Projects that do not follow the above guidelines, including those that involve sensitive topics or vulnerable populations, are not eligible for a class project exception.** Projects addressing more sensitive topics or involving vulnerable populations must be submitted as individual student research projects or as a class protocol, with a faculty member supervising the research and serving as the PI. Instructors planning to submit a class project application for IRB review are strongly encouraged to contact HIRB as soon as possible for additional guidance on choosing class research projects that satisfy the criteria for a class protocol.

The Homewood IRB stands as a resource to help class instructors even if the class project activity does not require IRB review.