

Guidance on Research Involving Students as Research Participants

A basic principle of the regulations governing the use of human subjects in research is that the subjects' participation is *voluntary* and based upon *full and accurate information*. The inherently hierarchical nature of student-teacher relationships can impact the "voluntary" nature of research that involves student participation. Students may volunteer to participate because they believe it will place them in a favorable situation (e.g., better grade, better recommendation, employment possibilities), or that failure to participate will negatively affect their relationship with the investigator or teacher (e.g. lower grade, less favorable recommendation, being "uncooperative" and not part of the scientific community). Care should be taken so that teachers do not unduly influence students' participation in research. It is rarely the case that faculty researchers intentionally coerce students into participating. However, students' *perception* or *feeling that they are obligated to participate* must be considered. The following guidelines are offered to assist faculty who engage in research projects in which students will be asked to be research subjects. Information about what you as a researcher are doing to minimize coercion should be conveyed to the student subjects and to the IRB in the formal protocol.

Recruitment

Solicitation of volunteer student subjects for research must be done in a non-coercive manner. To avoid undue influence, student subjects should be recruited by a general announcement, central posting, or announcement mechanism that includes a clear description of the project and what is involved in participating (e.g., type of tasks or amount of time). The announcement can be done in person or electronically, but should be targeted to a broad audience rather than pre-selected individuals.

Consent

Some studies testing student subjects meet the requirements for designation as "exempt" from further IRB review because they involve normal educational procedures in educational settings (Exemption Category #1). Examples include surveys that have no questions that are risky for subjects to answer (such as questions about drug or alcohol use, illegal or immoral activity, sexual practices, etc.) or surveys that are anonymous (Exemption Category #2), or that are harmless and brief manipulations measured by participant's verbal response or observation of the participants (Exemption Category #3). For studies that meet the requirements for review under these categories, signed consent forms may not be necessary. However, a consent *process* is still needed and must be described. This might be a script or information sheet that contains the essential elements of consent (e.g., who is conducting the study, what is entailed in participating, a statement that participation is voluntary, and there are no negative consequences for those who choose *not* to participate, information about what is done to ensure confidentiality of the data, information about what aspects are required parts of a course and what aspects are voluntary research). Be sure to indicate how this information is communicated to participants (e.g., a written form they read, or something read aloud to them), and include the form or script with your application. Additional information on elements of informed consent are on the Fairfield IRB information page under the section "Informed Consent Templates." In cases where an information sheet or script is used and a signed consent form is not collected participants can indicate their consent simply by submitting the survey or other measures in the study.

Other types of research typically require a signed consent form, for example most studies reviewed by expedited review procedures or full board review. In your protocol you must describe the consent process, include a copy of the written consent form, and discuss what is being done to minimize any sense of coercion. For example, are student subjects told that participation is voluntary? Are they told that their professor will not know whether or not they choose to participate? Are they told that choosing to participate will not have any impact on their course grade? If they are told any of this, how are they told -- on the consent form and/or aloud as part of the consent process? See below for guidance when extra credit or other incentives are offered or when research participation is a required part of the class.

Data Collection

Whenever possible researchers should avoid data collection during regular class meetings. When student participation consumes a significant portion of a class section, loss of instructional time for both participants and non-participants may be considered a loss of benefits. Also, when research participation is expected during the same session at which participation is invited, students may be unduly influenced to take part due to peer pressure, perceived stigmatization from non-participation, or a sense of having otherwise wasted time by attending that day's class. When it is a short study (e.g., 5-10 minutes) that is being conducted during class time, it is best to have participation occur in the last few minutes of class so that students who do not want to participate can leave.

When the principal investigator is the course instructor, he or she should arrange to have the data collected by an independent third party whenever possible. This ensures that the investigator/instructor does not know who participated, and does not have access to the identity of participants for any purpose until course grades have been finalized. See below for information when participation is for extra credit or course credit.

It is recognized that in some research situations, the use of one's own students is integral to the research and hence the principal investigator is the course instructor. This is particularly true of research involving teaching methods, curricula, or other areas related to the scholarship of teaching and learning. In situations where activities are not part of a required class activity, and thus students may choose not to participate, it is recommended that the faculty member arrange to have the data collected by an independent third party. The instructor can then avoid seeing who participated and who did not and can avoid having access to identifiable data.

Even when the research is integral to the class, students should be given an alternative to participation. They have the right to exclude the use of their own data from any publications that result.

Confidentiality of Data

Since there are special risks of confidentiality in the school environment, special attention should be given to full disclosure of these risks when student subjects give their consent to participate. The plan for handling research data should be designed to minimize the risk that confidentiality will be breached. This is especially important when the course instructor is also the principal investigator. When measures call for the disclosure of information that participants may view as personal or sensitive (e.g., students' racial attitudes, religious beliefs, sexual practices, etc.), data should be collected in a manner that minimizes the chance of one participant learning the response of another or the chance of the instructor knowing which students made which responses. Thus when possible data collected should be anonymous, without links to the student's identity (name, email address, student ID, etc.). If data are collected at multiple times and the responses of given student subjects must be linked to their later responses, the use of uniquely generated codes that the student subjects supply might address this (e.g., the first two letters of your mother's maiden name, followed by the last two digits of your primary phone number, followed by the first two letters of their hometown, followed by the number day of the month you were born).

Incentives: Extra Credit or Course Credit

When extra credit or course credit is to be given to students who participate in research, students unable to or choosing not to participate in the research must be given other options for extra credit, for example: short papers, special projects, book reports, and brief quizzes on additional readings. Projects should be comparable in terms of time, effort, and educational benefit to ensure that students are not being inadvertently coerced into participating in the research.

Information about how many points towards a student's final grade the research participation is worth should be specified to student subjects, and the amount should not be so excessive as to be unduly coercive.

When extra credit or course credit is offered and the professor is the person conducting the research, this may create undue pressure on students to participate. When possible, data should not be collected in classes taught by the instructor/investigator, or a neutral third party should be responsible for conducting the study (recruiting participants, collecting data).

When the principal investigator is the course instructor and he or she offers extra credit or course credit to those who participate, an independent third party should keep track of who participated. That information should be given to the investigator/instructor only when final grades are being calculated.

In departments where there are formal Research Participant Pools ("Subjects Pools") in which participation in a fixed number of hours of research is part of the course requirement or is extra credit, the credit given should be nominal, students must be free to choose which studies they want to participate in, and an equitable alternative (e.g., a short writing assignment about research) is always available to students to earn credit in the Participant Pool should they choose not to or are unable to participate in research studies. Instructors should receive information about how many credit hours a given student subject earned but not about which specific studies that student participated in.

Withdrawing From a Study

To maintain their voluntary nature of their participation, student subjects must be allowed to withdraw from the study at any time. The informed consent statement should make clear the consequences of withdrawing from a project prior to completion. In general it is favorable to give credit if the subject withdraws, unless the student withdraws immediately or there is evidence of bad faith on the part of the student.

Debriefing Student Subjects

For studies that involve deception, there are detailed requirements for disclosing the deception to participants after their participation. The IRB recommends that debriefing be used as an educational tool, even for studies that do not involve deception. Student subjects should be given a simple, clear, and informative explanation with pertinent information about the rationale for the study.

Additional Guidance for Research Conducted in K-12 Schools

A principal investigator (PI) must acquire a letter of support to conduct research from the Principal(s) of the school(s) where the research is to be done. If the district has a data research evaluation board, include a copy of the district approval or support letter along with those of the schools involved. The letter(s) of support must be submitted to the IRB with the protocol. If the district of school requires IRB approval before issuing its letter of support, please contact the Fairfield University IRB for assistance prior to submitting a protocol.

Non-exempt research involving minors (under 18 years of age) as subjects requires signed parental permission in most instances as well as assent from the student (age 6-12 verbal, age 13-17 written). Some types of research may qualify for Waiver of Parental Permission. If a parental permission form is sent home with a potential student subject, the investigator's contact information should be provided on the form to enable parents to ask questions.

Parental permission and assent procedures should clearly state the activities that are part of the research and specify what parts are non-research activities (e.g., a program of instruction that is presented to the entire class in a conventional manner as a regular part of their education). Student interviews or questionnaires administered to assess the program for research purposes are research activities for which parental permission and assent are sought. Individual student performance data that are part of the instruction can be included as research data only with explicit permission and assent for this additional use.

An investigator may not invite participation of potential subjects by a letter that requires the subject to send back a postcard (or to email or call) only if he or she does not wish to participate. Subjects may become unwitting participants if, for example, they never receive the letter, don't read English, or are simply confused by the instructions. This approach also raises privacy concerns for certain types of research (e.g., research involving sexually transmitted diseases or psychiatric illness, or drug or alcohol abuse). The IRB only approves passive consent procedures if the federal criteria for waiving informed consent are met.

Research supported by the U.S. Department of Education (DoED) is subject to additional requirements and ethical standards. See <https://www2.ed.gov/about/offices/list/ocfo/humansub.html>

The Family Educational Rights and Privacy Act (FERPA) is a federal law that protects the privacy of personally identifiable information contained within a student's educational record. FERPA applies to all schools (K-12 including postsecondary institutions) that receive funds under various programs from the U.S. Department of Education. Generally investigators may not access classroom performance evaluations, grades, or information in a student's records without prior written permission from a parent or authorized legal representative, regardless of the access an investigator may have in his/her academic role. An investigator who is also an employee in the school system should be aware that he or she may have access to student records as an employee, but does not have the same access as a researcher. Investigators should contact each institution where research is going to take place and follow that institution's FERPA policy when accessing directory information.

The Protection of Pupil Rights Amendment (PPRA) requirements apply to surveys of students which reveal protected information of a sensitive nature. PPRA outlines protections for DoED funded surveys as well as surveys conducted in institutions that receive funds from any program of the DoED. Protections include allowing parental inspection of survey materials and parental permission (consent), therefore PPRA impacts the determination of an IRB to waive elements of informed consent in order to allow passive consent.

The Children's Online Privacy Protection Act (COPPA) administered by the Federal Trade Commission may apply to K-12 research conducted using online mechanisms. If minors will be recruited or possibly in the recruitment pool, parental permission must be addressed. Researchers are prohibited from collecting personal information from a child without posting notices about how the information will be used and without getting verifiable parental consent.

Note: Portions of this document were adapted or taken from educational materials from the IRBs of Clemson University and University of Kentucky.