

A Guide to IRB for Faculty Engaged in SOTL Research

Faculty who engage in the Scholarship of Teaching and Learning (SOTL) almost always involve *human subjects* as part of that research. Federal law mandates that research involving human subjects be subject to review so as to protect the rights and welfare of participants. At Stonehill, the Institutional Review Board (IRB) is responsible for ensuring that all federal—and college—policies regarding human subjects are enforced.

Not all academic research with human subjects requires the same level of review, however, and much of the study we do on teaching is, as we shall see, federally exempted from full institutional review. This guide is meant to help Stonehill faculty doing SOTL research determine what level of review they need (if any) so as to be in compliance with IRB policies. (NB: This guide describes Stonehill IRB expectations when involving Stonehill students in research; if you are researching at another institution or with a different population, then the expectations may differ.)

Please note that this guide is meant to highlight areas of particular concern to those doing SOTL research and is not a comprehensive guide to the IRB process at Stonehill. Faculty should consult the IRB website for complete information about policies and procedures (<http://www.stonehill.edu/x11020.xml>). In addition, faculty may contact Tom Gariepy, Chair of the IRB (tgariepy@stonehill.edu) or Bonnie Troupe, Director of Academic Development (btroupe@stonehill.edu) with questions.

Who Comprises Stonehill's IRB?

Tom Gariepy, Chair, Healthcare Administration
Bonnie Troupe, Academic Development
Erika Tucker, Sociology
Margaret Niznikiewicz, MD, Harvard Medical School; Brockton VA Hospital

Margaret Boyd, Sociology
Lincoln Craton, Psychology
Laura Uerling, Institutional Research
Christopher Poirier, Psychology (alternate member)

The Board itself has been certified by the Department of Health and Human Services; the Board's members are individually certified to serve on the Board. Also, some members belong to PRIMR—Public Responsibility in Medical Research. This group serves as the professional organization for IRB members and offers continuing education and conferences for IRB members.

Types of Institutional Review

As is detailed in section IV of the college's IRB documentation, there are three types of IRB review:

- **full** (which must be presented to the full IRB),
- **expedited** (reviewed by the chair and selected members of the IRB), and
- **exempt** (determined by the IRB chair).

The distinctions are made depending on the level of risk that research may present to participants. For the most part SOTL research tends to fall within the “exempt” category and so only needs to be reviewed by the IRB chair. Do note that some kinds of classroom assessments are not considered “research” according to federal guidelines and so require no review at all. The following sections are meant to help you determine whether or not your project requires submission to the IRB and what submission entails.

Non-Research Activities

Early definitions of SOTL positioned it as a continuum that encompassed a wide range of classroom-based, data-gathering activities, including those that were meant solely for a faculty member's personal use in assessing a course or instructional technique. However, for the purpose of determining what is subject to IRB review, we are making a distinction between such classroom assessment activities and SOTL research.

Activities whose sole purpose is *instructional* or related to routine *course or program development or assessment* are not considered research and so are not subject to IRB guidelines and **do not need to be submitted for review**.¹

Examples of activities that would not be considered research according to federal guidelines are: non-obtrusive observation of participants in public settings; data-gathering from class members solely for classroom purposes; activities related to training students in research methods; and needs assessment or evaluation data intended to remain within the Stonehill community.

There are **two exceptions**: 1) When these activities are conducted with the intent of using that data *external* to the Stonehill community (in presentations or publications), then it is considered research and must be submitted for review to the IRB. 2) Furthermore, when data gathered from students is *sensitive or personal and thus likely to cause stress* to study participants, then it is also subject to IRB review.

If you have a question as to whether your data-gathering activity would be considered research by the IRB – and thus subject to review – you are welcome to contact any member of the board (see above).

Exempt Research (Does Not Mean “No Review is Necessary”)

Most SOTL research falls into the exempt category, which is reserved for research that offers minimal or no risk to participants.

It's important to note that the exempt review category does not mean that such research is exempt from all review. Although proposals for exempt research need not be submitted for full board review, they do need to be submitted to the IRB Chair, who will decide if exempt status is appropriate or whether further review by the IRB is required.

Here is the kind of research that is exempt from full review (details can be found in section V of the Stonehill IRB document as well as in an excellent white paper published by the University of Wisconsin²):

- **Exemption for Instructional Strategies in Educational Settings.** Research conducted in established or commonly accepted educational settings are exempt from full IRB review if they involve normal educational practices such as a) research on regular and special educational instructional strategies, or b) research on the effectiveness of, or the comparison among, instructional techniques, curricula, or classroom management methods.

¹ This applies when these are activities conducted with students in the investigator's own class. When instructional research involves students outside of the course one is teaching, the investigator should seek IRB guidance.

² http://www4.uwm.edu/sotl/help_support/upload/LSIRBDEC07.pdf

- **Exemption for Research Involving Educational Tests.** Research involving the use of educational tests is exempted as long as the information is recorded in such a manner that participants cannot be identified either directly or through identifiers linked to them, and as long as any disclosure of the participants' responses would not reasonably place them at risk of criminal or civil liability or be damaging to their financial standing, employability, or reputation.
- **Exemption for Survey or Interview Procedures.** Research involving survey or interview procedures is exempted, with the same caveats as those concerning research involving educational tests. Note, though, that surveys or interviews on sensitive or personal topics which may cause stress to study participants are not exempt from IRB review.
- **Exemption for Research Involving Observation of Public Behavior.** Research involving observation is exempted, with the same caveats as those concerning educational tests and interviewing.
- **Research for Collection or Study of Existing Data.** Research involving the collection or study of existing data, documents, records, pathological specimens, or diagnostic specimens is exempted, if these sources are publicly available or if the information is recorded by the investigator in such a manner that participants cannot be identified directly or through identifiers linked to them.

If you have a question as to whether your SOTL project would fit into this category, contact Bonnie Troupe or Tom Gariepy.

Observational vs. Experimental SOTL Research

The types of “exempt” research described above are considered *observational* research, in that the researcher observes or obtains information from participants. *Experimental* research, in which the researcher sets one group as a control against another—providing each group with separate treatments in order to determine if the difference in treatment leads to a statistically significant outcome—is not exempt and would need to go through full IRB review.

Submitting Your Proposal

Full information about the IRB proposal requirements – as well as all relevant forms and due dates – can be found on the IRB website (<http://www.stonehill.edu/x11020.xml>). Typically, your proposal will consist of:

- IRB Application Form
- Lay Summary (summarizing the rationale and methodology of your project)
- Informed Consent Form (that you will be distributing to any subjects involved in your study)
- Grant proposal for research (if applicable)
- Debriefing statement – to be shared with participants after completing the study (if applicable)
- Agreements from other participating institutions (if applicable)

Informed Consent: Protecting Students' Rights

Students participating in SOTL research have the right to avoid harm, to have their confidentiality maintained, and to opt out of the research project if they choose. This is particularly important in light of the fact that in SOTL research, there is a risk that students might feel coerced to participate because of the power you hold as their instructor (e.g. one who has control over their grades, recommendations, etc.).

One way we seek to protect students' rights is by asking for their consent to participate in or have their coursework used in SOTL research. In accessible language, all participants must be made clearly aware—among other things—of the purpose of the research; the expected duration of the participants' participation; the procedures to be followed; any foreseeable risks or discomforts; how confidentiality will be maintained; and the fact that the participant may withdraw consent at any time. The form can also include possible benefits (why the research is important, how future students may benefit, etc.).

Note that while informed consent can never be waived, *written* informed consent can be waived in some instances. For example, in a computer-based survey, the first screen can contain language that states that continuation with the survey implies consent. Informed consent is valid for one year only (the dates of validity are usually included as a footer to the informed consent form).

A full listing of the concerns covered by Stonehill's policy of informed consent may be found in Section VII of the IRB policy. In addition, the College has developed a convenient Informed Consent Form Template, which can be found on Stonehill's IRB website (see above) and can be adapted to fit the needs of your project.

NB: If your research requires you to access information that is typically protected by FERPA (such as a student's academic or disciplinary records), then you are advised to consult with the IRB Chair about how to proceed.

Things to Keep in Mind When Developing SOTL Research

- Always read the College's IRB procedures as you are creating the research project and complete an IRB application and informed consent form for the IRB chair.
- If your subjects are also students in your class, make sure anyone who wants to may decline to participate in the research. Participation must be voluntary; thus, you may never make participation a condition of completing a course. Your informed consent form should include language indicating that a student's choice not to participate will not adversely affect his or her relation with Stonehill College or with the professor.
- Student papers or assignments that are assessed for research purposes should not be analyzed until after grades have been posted (if at all possible), and should have identification removed before they are processed. You might even choose to have a colleague collect consent forms so that you cannot access them until after grades have been submitted.
- Be sure you have in place confidentiality procedures to remove all identifiers from student surveys or questionnaires, or other collected evidence, as much as possible.
- You may choose to request consent later in the semester, once students have a clearer understanding of what aspects of their work you'll be using. It is possible to gain consent to use student work after the semester is over but it is more difficult to arrange.³

³ For further cautions, see the University of Wisconsin white paper, pp. 4-6.

Conclusion

The IRB serves two purposes: 1) to protect research participants' rights to informed consent, privacy, and confidentiality and 2) to assist colleagues in incorporating these protections into their own research. If you have questions about any aspect of the IRB process or about your own research design, please don't hesitate to contact any IRB member.

For Further Reading

- Burgess, R. G. *The Ethics of Educational Research*. London: Falmer Press, 1989.
- Burman, M. E., and Kleinsasser, A. "Ethical Guidelines for Use of Student Work." *The Journal of General Education* 53.1, (2004) 59-79.
- Hutchings, P. "Competing Goods: Ethical Issues in the Scholarship of Teaching and Learning." *Change*. September/October, 2003. pp. 27-33.
- Hutchings, P., ed. *Ethics of Inquiry: Issues in the Scholarship of Teaching and Learning*. Menlo Park, CA: The Carnegie Foundation for the Advancement of Teaching; 2002.
- Kincaid, S. and Pecorino, P. "Ethical Issues in Pedagogical Research," *Community College Humanities Review*, 26.1 (2006)
- McKinney, K. *Enhancing Learning Through the Scholarship of Teaching and Learning*. Bolton, MA: Anker, 2007.
- Pecorino, P., Kincaid, S., and Girona, B. "Research and Experimentation in Teaching Effectiveness: The Ethical Review Process and the IRB." *International Journal for the Scholarship of Teaching and Learning* 2.1 (2008) 1-11 [<http://www.georgiasouthern.edu/ijstol>]

Special thanks go to John Lanci, Professor of Religious Studies, who researched and compiled this guide as part of his work as the CTL Faculty Fellow for SOTL.