



IRB Guidance: Investigators Using Own Students as Research Subjects

Purpose: This guidance is for investigators who are teaching course at Campbell University and are planning to enroll students from these courses in their study. These can be curriculum-based and non-curriculum based research projects which collect student's personally identifiable information. If the instructor is only using their students' data for internal assessment or evaluation purposes and have no plans to use the data for research purposes, IRB approval is not needed.

The Belmont report, which is the foundation for which human subjects research regulations are based on, stresses that a subject's participation must be voluntary, based upon full and accurate information. Research with one's own students inherently challenges the subject's "voluntariness" due to the power difference between students and instructor. Students may feel as though they have to participate or risk having their non-participation impact their grade or relationship with the professor. The IRB understands that real coercion is rare in research, but the perception of coercion potential can be a problem in obtaining voluntary informed consent. For this reason, the IRB has taken the position that instructors should not use their own students as subjects in their research if it can be avoided.

The Campbell IRB recognizes, that in some situations, it may be acceptable to use one's own students to conduct research. This may apply to research of teaching methods, curricula and areas related to scholarship of teaching and learning. The following model of research design can be approved by the IRB.

Collection of Data by Third Party

An independent third party, who does not have power or authority over the students, must be part of the recruitment, consent process and data collection, if applicable. This third party can recruit in-person or via email, conduct the consent process and explain and provide assurances to the student that no penalties will result by not agreeing to participate in the research. Please note: The specific role of the third party may nor may not require them to be listed as a project team member on the IRB submission. Individuals who are tasked with obtaining consent (describing the study procedures, answering questions about the study, ensuring comprehension, etc.) are engaged in human research activities and are considered investigators by the IRB.

As an instructor and researcher you must wait until the end of the professor-student relationship before accessing the consent forms collected by the third party (i.e., after all marks have been submitted to the Registrar's Office). This will mitigate any real, or perceived influence toward the student's grades. Identifiable data can only be analyzed after grades have been submitted. If the third party is only tasked with temporarily holding of consent, then they would not be considered part of the project team.

Informed Consent

Student academic records are regulated by federal law, specifically, The Family Educational Rights and Privacy Act (FERPA) that protects the privacy of personally identifiable information



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within a student's educational record. Campbell University requires a signed FERPA compliant informed consent document to access educational records. The informed consent document must clearly explain the following:

- Risks – address how the risk of coercion will be minimized;
- That participation will not affect grades or standing in class;
- What information from their student records may be disclosed, the purpose of the disclosure and who this information may be disclosed to;
- That a student may withdraw from the research at any time without penalty and withdrawing prior to the end of the research will not affect their grade or standing in class.

Investigators should consider the following:

- Students should not be used as a population of convenience for faculty/staff research. In any proposed research project involving recruitment through classrooms, student listservs, or other student groups, a clear explanation or justification should be provided as to why those students are the most appropriate participants for the project;
- Permission must be obtained from the instructor of a Campbell University class/course where research activities may take place, including student recruitment. For research through student programs or services, permission from an appropriate administrator should be requested. Documentation of support or permission may be required by the IRB;
- Researchers must ensure that the recruitment and informed consent processes minimize the possibility of coercion or undue influence;
- Many research activities can be similar to or overlap with normal course work or class projects. The researcher is responsible for ensuring that students can truly understand what participation involves and can distinguish voluntary research activities from required course activities.
- Research activities that occur within a classroom, including recruitment, consent, or data collection, have the potential to identify to other classmates and the professor/instructor who is participating and who is not. To protect identities of research subjects, research activities should be done in a way that does not identify them to each other or their professors/instructors. For example, sign-up sheets should be collected individually from student (no public sign up list), and alternative classroom activities can be given to students who decide not to participate so an observer could not distinguish between research and non-research activities (e.g., both are working on a computer).