

Classroom Activities Policy Siena University Institutional Review Board (IRB)

Q: DO CLASSROOM ACTIVITIES INVOLVING CONTACT WITH HUMAN PARTICIPANTS WHO ARE NOT MEMBERS OF THE CLASS NEED REVIEW AND APPROVAL FROM SIENA'S IRB?

A: IT DEPENDS ON SEVERAL ASPECTS OF THE ACTIVITY AND WHAT IS DONE WITH THE DATA

If **any** of the following are involved, then the classroom activity needs the appropriate level of IRB review (exempt, expedited, or full, depending on the nature of the project):

- 1) the collection of **personally identifiable information**, including audio or video recording (as applicable, see "Guidance For Media and Creative Arts Projects")
- 2) **dissemination of the data/findings outside of the classroom** (e.g., presentation at Academic Celebration or departmental event, conference poster or presentation, journal publication).

According to the United States Office for Human Research Protections (OHRP), activities involving human subjects are subject to regulation and IRB review if they constitute research, defined as "a systematic investigation, including research development, testing, and evaluation, designed to contribute to generalizable knowledge" (45 CFR 46.102). If there is any possibility that the faculty member or any student(s) in the class will want to disseminate the data/findings in the future, submit the project for review. The IRB cannot issue retroactive approval.

- 3) **more than minimal risk** of psychological harm based on the sensitivity of subject matter, risk of physiological/physical harm, and/or risk of informational harm (i.e., if information about the participants becomes public, it could cause damage to someone's reputation, employability, etc.);
- 4) the use of **deception** and/or an **aversive intervention**.

If there is any doubt whether an IRB review is required, please contact the Chair of the IRB at irb@siena.edu for guidance.



Policy Adopted 2/2018

Siena University IRB Position Statement On Classroom Activities Involving Human Subjects

Regardless of whether or not a classroom activity involving human participants needs IRB review, the Siena IRB takes the position that faculty who are teaching research methods and skill-based courses (e.g., interviewing, assessment) have an obligation to ensure that appropriate practices are put in place to safeguard the ethical and responsible treatment of participants (e.g., obtaining informed consent, not placing participants at risk of harm).

All students in research methods classes that involve human participants in classroom activities are encouraged to complete CITI training (accessed via the [IRB website](#)) in order to be well-versed about ethical responsibilities when involving a human participant in the gathering of information, even if the information is only being gathered for teaching purposes.

(Policy Adopted 2/2018)

IRB Guidance for Media and Creative Arts Projects

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The rapidly changing means for capturing individuals' visual and/or vocal identity are sensitive matters when conducting research and/or media-related projects.

Individuals who participate in media-related or creative arts projects are people whose rights to privacy, informed consent, and fair representation are in the hands of the person(s) responsible for the project. Researchers and those completing media-related or creative arts projects have a responsibility to think through the potential risks to participants and to communicate these appropriately, particularly if the public display of their image and/or voice connects them with a sensitive issue that could result in damage to their reputation, employability, or could expose them to the risk of physical harm, retribution, or legal consequence.



Projects require IRB approval if you are including interviews with a person about him or herself and the questions relate to personal experiences (rather than asking about their area of expertise or public competence). When the risk of exposure or embarrassment to a participant is greater than what a person would experience on a daily basis ("more than minimal risk"), procedures must be put in place to protect those participants from harm.

Even if your interactions with an individual do not meet the definition of research, it is always useful to address the principle of respect for persons through written informed consent.

(Policy Adopted 9/2018)

Siena IRB Classroom Activities Policy FAQs

Q: If my students are not collecting data from human subjects, is an IRB review needed?

A: No! The IRB only reviews research conducted with human subjects. The federal regulations in 45 CFR 46.102 provide the following **definition of “Human Subject”**:

A living individual about whom an investigator (whether professional or student) conducting research obtains data through (1) intervention or interaction with the individual or (2) identifiable private information.

Q: I’m still not sure if my classroom activity meets the definition of “Human Subjects.” Help?

A: You’re not alone! Unfortunately, the definition is not straightforward. Please feel free to contact the Chair of the IRB at irb@siena.edu for guidance.

Q: My students are learning about research and we will be practicing data collection by using other members of the class. They will present findings in the form of a paper seen only by me and presentation to the class at the end of the semester. Do they need IRB approval?

A: If the project doesn’t involve collection of identifiable data, is minimal risk, *and* doesn’t involve deception or aversives, then no! The instructor ensures that appropriate practices are put in place to safeguard the ethical and responsible treatment of the participants. The IRB recommends students complete CITI training.

Q: Same question as above, except we’re going to recruit participants outside of the class.

A: Same answer as above, with a few guidelines. Use of the Daily Digest is limited to projects that have IRB approval, the use of email distribution lists are prohibited, and other instructors should not distribute surveys that are not IRB-approved to students. It is important to clearly note, in writing when possible, that the activity is a class project and *not* a research study.

Q: Is the IRB available to provide me and/or my students more training?

A: Yes! Feel free to contact the Chair of the IRB at irb@siena.edu to discuss the best way to meet your needs.