

A guide to IRB protocol considerations when research involves participants who are students.

INSTITUTIONAL REVIEW BOARD

Students as Research Subjects

students. As well, this option is not feasible if you wish to access FERPA

Alternative: invite all students to participate and allow for a control group, if feasible, to support conclusions and eliminate alternate explanations for results.

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required to do the work but that the research team will only analyze the work from those students from whom consent/assent has been obtained.

The burden of demonstrating whether an activity is part of normal educational practices is on the researcher. If a proposed research project appears to place participants at risk or has no precedent in previous, published research, the IRB will likely question the “normalcy” of the activity. For this reason, you should be prepared with a brief literature review that provides enough background information for the IRB to determine whether the proposed activity falls within what is typical in the context of a specific classroom setting. What is considered to be normal in one classroom may not be in another. For example, curriculum and interventions for special education students in the primary or secondary setting are tailored to each student, so normal classroom activities in a special education environment are specific in a way that they would not be in a general education environment. Be prepared to provide the contextual information about the school environment in which you intend to conduct your research in your IRB protocol. Do not assume that IRB members will automatically know this.

Special, research-specific interventions. If you plan on conducting a special investigation or intervention

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Educational records are protected under the Family Educational Rights and Privacy Act (FERPA), and there is no statute of limitations on the privacy of unidentifying educational records. FERPA still applies to students' records even if they have graduated or are no longer enrolled at the school. FERPA also applies to counseling and medical records. Teachers and administrators cannot be asked to share information about specific students without the student's and parent's consent.

School permission alone is only acceptable if it confirms that the research team will not access educational records or the school will provide you with information from which all of the identifying information has already been removed.

In your protocol materials, please also avoid false claims about anonymity. If a researcher has access to individual student information and if he/she knows who participated in the research and who did not participate, the subjects are not anonymous. Efforts should be made to maintain confidentiality—such as through the use of pseudonyms—but anonymity cannot be guaranteed. Do not use the word “anonymous” in your protocol submission if it does not apply.

Observations in the Classroom

If the classroom environment will be observed, the IRB application must provide details about what information the research team wishes to gather from the observations and how the observations will help to answer the research questions. The IRB often receives educational research submissions that contain vague language about classroom observations. A rationale, justification, and details must be provided in order for proposed observations to be approved. In addition to explaining the nature of the observations, the IRB application must also explain who will conduct observations, when they will occur and how frequently they will occur, whether or not any information that could identify individual students will be recorded, and what data elements will be recorded. You may wish to create an observation intake sheet to record specific data elements to be gathered from observations.

Audio and Video Recording in the Classroom

If the classroom environment will be recorded, an explanation should be provided in both the IRB application and on the consent form about why the recordings are needed to carry out the research. A video recording may be able to catch more than what a teacher could observe. In a primary or secondary school setting, the teacher/researcher role can become conflated when recordings capture behavior that may require disciplinary action on the part of the teacher but that may not be relevant to the research. The teacher's role may interfere with the researcher's promise that participation will not negatively impact the student. The protocol should explain how such situations will be handled. As with individually identifying secondary data, video

handled in a classroom where some students may provide consent/assent for