

INSTITUTIONAL REVIEW BOARD (IRB)
IRB GUIDANCE ON STUDENTS AS RESEARCH PARTICIPANTS

SCOPE: This guidance aims to minimize coercion or influence in research involving UMassD students as subjects in projects conducted by faculty, instructional staff, and other researchers.

BACKGROUND:

Universities offer researchers a valuable pool of potential participants, primarily consisting of students. UMassD recognizes the significance of involving students in research pertaining to teaching methods, curricula or other areas related to the scholarship of teaching and learning. Federal regulations mandate investigators obtain consent only in circumstances which offer prospective participants accurate information and ample opportunity to consider participation; thus, minimizing the risk of coercion or undue influence and ensuring the consent process is informed and voluntary. Students (individuals or groups) should not be selected for participation out of convenience if they would not otherwise be appropriate for participation. Faculty cannot require students (e.g., undergraduates, graduate, nursing, or doctoral students, etc.) participate in research as a course requirement without a comparable non-research alternative being offered. The IRB evaluates all studies for the potential presence of coercion, undue influence, power disparities, and the selection process for student participation is fair. Investigators and departments that depend on students as participants and/or maintain student “subject pools”, are encouraged to adopt procedures which adhere to following elements.

ELEMENTS FOR CONSIDERATION:

- 1. Right to Disclosure and Withdrawal:** Students have the right to the prospective disclosure of research opportunities, especially if the opportunity to serve as a research participant is under direction of their instructor/investigator. Investigators should refrain from soliciting individual students and enrolling students they supervise. If a course requires students to serve as research participants, then the course syllabus must include a research disclosure which details the purpose, procedure, risks/benefits, and alternatives of participation. Furthermore, during the first week of classes, instructors should educate students on the research opportunity and provide them with a written description of the alternative ways to fulfill the academic requirement. When regular classroom activities are part of a research study, the consent form must differentiate between optional activities and activities which are required regardless of the research study. When compensation is offered, compensation for participation should be not contingent on the completion of participation, but instead should be prorated as study participation progresses to ensure voluntary participation. Students who consent to participation must be able to withdraw from participation at any time without penalty. In exceptional circumstances, where study designs require concealing the research purpose until data collection is complete, students must not be subjected to undue stress or embarrassment. After data collection is complete, students must undergo debriefing, during which they receive a full disclosure of the study purpose, rationale for deception employed, and the opportunity to decide whether the researcher(s) can use the data collected from them.

- 2. Avoiding Unintentional Coercion and Undue Influence:** Protocols involving student’s participants must be designed to minimize coercion and undue influence; the IRB reviews recruitment strategies for factors influencing participant decision making to ensure voluntary participation and reduce any perception of obligation, among students taught directly by the investigator (s). Strategies to minimize the investigator’s potential influence on their own students include recruitment by general announcements, public postings, sign-up sheets, or other methods that require an interested student to initiate contact with the researcher(s). Recruitment can be in person or electronically but should target a broad audience rather than pre-selected individuals. Students should be encouraged to participate based on a genuine interest, understanding their decision to participate will not influence grades, potential letters of recommendation, or other decisions made by instructor/investigator. Studies which require student participation from a class activity or using pre- and post- tests to determine curriculum efficacy, should employ an independent party to collect consent and data to minimize undue influence. Maintaining the instructor/investigator’s blindness to participants data and identifiability until grades have been posted at the end of semester ensures impartiality (note: teaching assistants of the same class are not considered independent third parties). Investigators proposing to enroll students from their own classes in research involving greater than minimal risk must ensure the prospect of direct benefit. Such studies may only proceed after the IRB has determined the research is of significant importance, could not be conducted without the enrollment of the specific students, and includes adequate provisions to minimize the possibility of coercion. In all circumstances, students should be provided with the IRBs contact information in case they have any questions, concerns, or issues related to ethical conduct.

¹ Various factors influence student participation in research, often stemming from misconceptions regarding the implications of volunteering. Students may choose to participate due to perceived benefits such as academic advancement, improved recommendations, or enhanced career prospects. Conversely, they may fear repercussions for non-participation, ranging from lower grades to perceived social exclusion within the academic community. Additionally, cultural, or religious backgrounds may shape their decisions, emphasizing deference to authority figures. Furthermore, when participation is expected immediately after invitation, students may experience pressure from peers, fear social stigma associated with non-participation, or perceive a loss of time if they opt out during the class session. These complexities underscore the need for robust ethical considerations to ensure informed and voluntary participation in student research endeavors.

- 3. Course Credit for Participation:** To ensure fairness and transparency in research, courses must not require a student to participate in research for course credit without offering a comparable non-research alternative, proportionate to the course requirement in terms of time, effort, and educational benefit. Courses requiring students to participate in a research subject pool must also offer an alternate option to fulfill the course requirement. Equitable alternatives include: short papers, special projects, book reports, additional readings, research seminars, or similar projects. Study designs should avoid influencing a student's grade without valid justification, if participation is meant to affect the student's grade, a withdrawal plan which does not affect the student's grade must also be provided. Information about the allocation of points for research participation should be clearly communicated, and penalties or deductions in credit should not be imposed on participants who chooses to withdraw from a study.
- 4. Safeguards for Privacy and Confidentiality:** Additional measures may be necessary to safeguard the privacy interests of student research participants. Researchers should avoid data collection during regular class sessions, as classroom conditions may compromise participant confidentiality, preferring instead the conduct of research off-site and/or outside of regular class sessions may minimize potential risks. When short studies (e.g., 5-10 minutes) are conducted during class time, participation should be scheduled for the final minutes of class to accommodate non-participants leaving. When designs call for the disclosure of personal or sensitive information, research data security and retention plans should prioritize confidentiality ensuring participants cannot access other participant responses and that instructors cannot identify individual student responses. When possible, data collection should maintain anonymity, without links to the student's identity (name, email address, student ID, etc.). If data must be linked across multiple responses, unique codes generated by the student should be used to maintain anonymity.
- 5. Group Data:** Research scenarios involving group projects or video recordings of a group interactions require consent be obtained from each student's consent for the data to be used in the instructor's research. If one student withholds consent, the data may only be used if the non-consenting student's data can be effectively excluded from the analysis.
- 6. Subject Pools:** Departments with Subjects Pools, offering course credit in exchange for research participation, are responsible for ensuring: the credit provided aligns with the effort required by participation; students are free to choose which studies they want to participate in; and students provide informed consent for participation. Pool administrators should inform instructors of the number of credit hours earned by each student without disclosing the specific studies they participated in. Instructors are responsible for providing equitable alternatives for students who opt out or are unable to participate in available subject pool research studies.
- 7. Family Educational and Rights Privacy Act (FERPA):** [FERPA](#) provides safeguards for students and parental privacy of educational records; any use of educational records for research must comply with FERPA regulations. UMassD's [FERPA policy](#) requires students to provide written consent specifying the records, purpose, and recipients of educational records. Documentation of support from an authorized individual of the institution may be required to obtain IRB approval.
- 8. Age of Majority:** The age of majority in Massachusetts is 18 years old. Research involving minors (<18-year-old) generally requires parental consent and assent from the minor. Some types of research may qualify for a Waiver of Parental Permission.

IRB CONSIDERATIONS:

The IRB considers the following factors in support of the proposed enrollment of students as participants in research:

- The research offers a potential educational opportunity and presents no more than minimal risk to participants.
- The consent form clearly outlines the research purpose, procedures, risks, benefits, incentives, alternatives, and withdrawal.
- Academic incentives offered do not unduly influence students' decision to participate and equitable alternatives are provided.
- Adequate measures are in place to protect the privacy of student participants and the confidentiality of their data.
- For research conducted within a classroom setting, the recruitment, consent, and data collection process is conducted by a neutral third party, ensuring the instructor remains blinded to the identity of participants until grades are posted.

INSTRUCTOR RESPONSIBILITIES:

Collecting data in an educational setting requires special consideration, please ensure the proposal addresses the following:

1. Under sources of potential participants, if the instructor intends to include students from their own class or if participation is a required part of class structure:
 - Identify the neutral third party responsible for recruitment, enrollment, and data collection.
 - Include an appendix with the research disclosure language to be embedded within the course syllabus.
 - Identify measures are in place to ensure participants are not pressured or coerced into participation, either directly or indirectly, and under what circumstances might participants feel pressured to participate?
2. Under the procedure for obtaining informed consent:
 - Does the consent form include all elements of consent, incentives, and alternate options? Ensure to include mechanism for participants to provide feedback or raise concerns about their participation in the study, such as contacting the IRB.
 - If a study proposes to involve deception: identify the justification, outline post-research debriefing procedures, and the debriefing consent form.
3. Under Study-specific costs and compensation, if participation in a study is required and will affect the student's grade:
 - Provide a valid justification.
 - Delineate the allocation of points for research participation.
 - Include a withdrawal plan which does not affect the student's grade, ensuring penalties or deductions in credit will not be imposed on participants who chooses to withdraw from a study.
4. Under Confidentiality, clarify:
 - Does the study plan to collect sensitive information with legal impact (i.e., violence, illicit drug use, etc.)? If so, the consent form needs state which sensitive information will be collected which could be reported legally.
 - Does the study plan to collect identifiable information/data? If so, include a justification supporting the necessity to collect identifiable information/data and clarify when instructors will know the identity of students who choose to participate. If not collecting identifiable data, clarify how participant data will data be kept anonymous.
 - Does the study plan to collect student educational record data? If so, include a documentation of support confirming access and use of student record data for research purposes is acceptable from the registrar. While faculty may have access to the educational records due to their role, permission to use the data for research is required, the consent form must identify records, purpose, and recipients.
 - Would the collection of research data outside of class be preferable or possible?
5. Under Potential Risks, clarify:
 - Is there a possibility that a student, or a specific group of students, may feel left out or ostracized from class activities if they choose not to participate in the study?
 - Is there a possibility study data collection could reveal participant information to the class which could be considered embarrassing or harmful to a student?

Adapted with gratitude from the following references:

1. Tufts University. Office of the Vice Provost for Research. [HS IRB Policy: Employees and Students as Research Participants](#).
2. Syracuse University. Research Integrity and Protections. [Policy: Students as Research Participants](#).
3. University of Pittsburgh. Human Research Protections Office. [Policy: Research Involving Students as Research Participants](#).
4. Boise State University. Office of Research Compliance. [IRB Guidelines: Investigators Using OWN Students as Research Subjects](#).
5. East Tennessee State University. Institutional Review Board. [Students in Research Guidelines](#).