

Number:	Date:	Author:	Approved By:	Page(s):
UGAHRP-095-0	08/21/2015	HSO	IRB	Page 1 of 3

1. PURPOSE

- 1.1. This **policy** is designed to discuss requirements and safeguards for using students at the University of Georgia as **research** participants. Students are a **vulnerable population** in that they may be subject to coercion or **undue influence** by the expectation that their decision to participate could affect their grades or class standing. **Confidentiality** may also be of concern to a potential student participant. The following policy applies to a researcher using their own students, a research pool or students of another faculty member at the University of Georgia.

2. DEFINITIONS

- 2.1. **Student:** Any individual who is enrolled in a graduate or undergraduate program at UGA.
- 2.2. **Student Pool:** A recruitment tool used by some departments in academic settings as a registry of students who may be interested in volunteering to participate in research studies. Student pools provide researchers with a group from which to recruit student participants. These pools may offer course credit for participation in research studies.

3. POLICY

- 3.1. The UGA IRB considers UGA **students** as a population that is vulnerable to coercion or undue influence.
- 3.2. The UGA IRB requires that risks to prospective participants who are vulnerable to coercion or undue influence are sufficiently mitigated and will ensure that additional protections are provided as required by applicable laws, regulations, codes, and guidance.
- 3.3. UGA students who are under 18 years old meet the regulatory definition of **children** and will be subject to additional protections and **procedures**. See *Policy and Procedure: Vulnerable Populations*.
- 3.4. If the research population includes UGA Athletes, written authorization from the UGA Athletic Department must be provided before IRB approval can be granted.
- 3.5. If targeting a student participant pool for research, the **Principal investigator (PI)**:
 - 3.5.1. is responsible for following the posted policy of the **student pool**.
 - 3.5.2. may not implement penalties for failure to show and must provide research credit, in full or pro-rated for duration of effort, to participants who withdraw.

Number:	Date:	Author:	Approved By:	Page(s):
UGAHRP-095-0	08/21/2015	HSO	IRB	Page 2 of 3

4. PROCEDURES: Researchers

- 4.1. In the submission, the PI or study team must identify that UGA students will be targeted.
 - 4.2. If course credit is offered as an **incentive**, the submission must describe a non-research alternative method to earn the same amount of course credit that involves commensurate duration and effort as the research activity. See *Policy and Procedure: Participant Incentives and Compensation*.
 - 4.3. The study team must include measures to mitigate or reduce undue influence such as the following:
 - 4.3.1. The following statement, or something similar, must be included in the recruitment and consent processes: “Your decision to participate or not to participate in this study will have no bearing on your grades or class standing.”
 - 4.3.2. Since the use of one’s own students may be integral to the research protocol being proposed, for example, when researching teaching methods and/or curricula, the PI should consider that the recruitment be carried out by a colleague or someone who has no means to influence grades. See *Policy and Procedure: Participant Recruitment and Selection*.
 - 4.3.3. If the research consists of a group activity, it also may pose difficulty for the potential participants to opt out (e.g., audio/video-recording observation of the class). The PI should consider only using data if the non-consenting students’ data can be effectively excluded. For example, set-up the room so that non-participants are not viewed, blur/alter the video, or erase portions of the audio. In non-exempt research, individually-identifiable data cannot be used without the **informed consent** of the participants unless the IRB has approved a waiver of the requirement to obtain informed consent. See *Policy and Procedure: Informed Consent Process*.
 - 4.3.4. If the research involves accessing individually-identifiable information such as grades or any other educational record, signed consent is required. See *Policy and Procedure: FERPA and WORKSHEET: FERPA*.
 - 4.3.5. When seeking **sensitive information**, the PI should take every precaution to ensure prevention of a breach of confidentiality. When possible, the PI should consider collecting this anonymously. This can be achieved by completing the data collection at a lab computer or collecting the data by pencil and paper with no identifiers.
 - 4.4. Some student pools require an educational debriefing that consists of an explanation of the hypothesis, how the research questions were formulated, how the study fits into existing literature, and how the findings will be used to all participants at the conclusion of the research activity (e.g., Psychology Research Pool). This should be attached to the submission as a supporting document. See *Policy and Procedure: Pre-Review*.
-

Number:	Date:	Author:	Approved By:	Page(s):
UGAHRP-095-0	08/21/2015	HSO	IRB	Page 3 of 3

5. PROCEDURES: Institutional Review Board

- 5.1. The IRB will review the submission to determine if students are being recruited as research participants.
- 5.2. If students are involved, the IRB will determine if there have been proper measures taken to mitigate or reduce undue influence. See *Policy and Procedure: Participant Selection and Recruitment* and *Policy and Procedure: Participant Incentive and Compensation*.
- 5.3. The IRB will review use of students for research activities to ensure that:
 - 5.3.1. risks such as legal risks and psychological stress are minimized;
 - 5.3.2. participation is voluntary and free of undue influence;
 - 5.3.3. informed consent requirements are met; and,
 - 5.3.4. measures to maintain the **privacy** and confidentiality of information from or about students are appropriate.
- 5.4. For **non-committee reviews**, IRB will offer the PI and study team the opportunity to provide additional information/materials and/or to revise the submission in appropriate review correspondence.
- 5.5. For committee reviews, IRB will offer the PI and study team the opportunity to provide additional information/materials and/or to revise the submission in appropriate review correspondence that describes missing information or required **modifications**.
- 5.6. The IRB will document information pertaining to determinations that the requirements of this policy have been met in the review history for non-committee reviews and, in the meeting minutes by recording the motion to approve for research reviewed by committee.

6. MATERIALS

- 6.1. WORKSHEET: FERPA Compliance

7. REFERENCES

- 7.1. 45 CFR §46.111
- 7.2. Policy and Procedure: Participant Selection and Recruitment
- 7.3. Policy and Procedure: Participant Incentive and Compensation
- 7.4. Policy and Procedure: Research with Vulnerable Populations
- 7.5. Policy and Procedure: Informed Consent Process
- 7.6. Policy and Procedure: Pre-Review
- 7.7. Policy and Procedure: FERPA and Use of Education Records