

RESEARCH CONDUCTED IN POST-SECONDARY SCHOOLS

This guidance focuses on research conducted in post-secondary schools with individuals 18 and older. For more information on research conducted in elementary and secondary schools, please see the RGD: Research Conducted in Elementary and Secondary Schools.

Federal Research Regulations

Students attending an institution of higher learning are not directly mentioned in the federal regulations as a vulnerable population. However, the University of Illinois Urbana-Champaign IRB considers students of the research institution to be a vulnerable population because students may be vulnerable to coercion or undue influence. The regulations state:

“When some or all of the subjects are likely to be vulnerable to coercion or undue influence, such as children, prisoners, pregnant women, mentally disabled persons, or economically or educationally disadvantaged persons, additional safeguards have been included in the study to protect the rights and welfare of these subjects.” [45 CFR 46.111(b) and 21 CFR 56.111(b)]

If students are involved as research participants, the investigator must include additional safeguards in the study to protect their rights and welfare.

Description

Student participation in research is common on university and college campuses. Of particular concern is the possibility that students may feel pressure to participate in research. Students may feel they must volunteer to participate to win favor with faculty (e.g. participating in research may lead to a better grade or letter of recommendation, etc.). Students may also feel that if they choose not to participate, it will negatively impact their relationship with faculty.

The University of Illinois Urbana-Champaign IRB recognizes the importance of students participating in research and does not prohibit students from voluntarily participating in research. The following guidelines have been implemented to protect students and minimize coercion while allowing students to voluntarily participate in research.

Class Credit for Research Participation

Often in behavioral or social science courses, class credit is offered for participation in research. If participation in research is required in a class, students must be given other options for fulfilling the research requirement. Other options must be comparable in terms of time, effort, and educational benefit. For example, to fulfill the research requirement, students can choose to participate in two hours of research, read research articles and answer questions, or attend a faculty research symposium. To reduce coercion, the questions about the research articles are not graded, and student who attend the symposium are only required to be in attendance to receive research credit.

Class credit should be described as Compensation in the IRB application and consent document. Class credit amounts should be described for the IRB to confirm appropriateness and assuring the risk of coercion or undue influence is minimized.

Students cannot be required to participate in one particular study to earn class credit. Students must have the freedom to participate in a study of their own choosing.

Students cannot be required to participate in research that is greater than minimal risk (as determined by the IRB) to earn class credit.

Right to Withdraw

If a student agrees to participate in a study, they may withdraw from the study at any time without losing credit. The right of the student to withdraw must be presented in the consent process and informed consent document.

Please contact the OPRS Office at (217) 333-2670 or irb@illinois.edu for additional guidance.

Additional Considerations

Confidentiality

The University setting may provide opportunities to conduct research involving the collection of data on sensitive subjects such as mental health, sexual activity, or use of illicit drugs or alcohol. This type of research may present confidentiality risks, particularly in the close environment of the university setting. Participants should be made aware of these risks in the consent process and the informed consent document.

Age of Consent

Individuals under the age of 18 are considered children (exceptions are described in the Research Guidance Document: Research Involving Children) and are subject to additional regulatory protections. Generally, children are required to have parental permission and provide assent (children age 7 and up) before participating in research. Investigators need to consider that some university students are not 18 years old and cannot provide consent to participate in research without first obtaining parental permission.

Student-Athletes: Compensation for Participation

It has become common for institutions to use student-athletes in studies specifically related to the conditions under which student athletes participate. Such research is important but must be balanced with protecting the student-athletes' eligibility to participate in collegiate sports. Providing compensation to student-athletes for participation in research studies is allowed provided the study does not violate any NCAA rules or regulations or jeopardizes a student-athlete's eligibility. The investigator should consult with the Athletic Compliance Office as needed.

Family Educational Rights and Privacy Act (FERPA)

The Office of the Vice Chancellor for Research and Innovation has provided guidance about utilization of student records in research which can be found here: <https://research.illinois.edu/understanding-student-data-and-ferpa>.

Student-Employees

In the event that student(s) may also be employed by the University of Illinois Urbana-Champaign, the investigator should be aware that there are restrictions on investigators enrolling employees in greater than minimal risk research. Employees may not enroll in research that is designated "greater than minimal risk" by an IRB if 1) they are directly supervised by an investigator (principal or co-investigator) of the research; 2) their direct supervisor reports to an investigator (principal or co-investigator) of the research. If applicable, the application should be clear that student-employees who report directly to an investigator or who reports directly to someone who directly reports to an investigator will be excluded from enrollment. For more information, please see RGD: Recruitment and Enrollment of Employees.

Points to Address

New Study Application:

1. **Subjects Section:** Select "Students, staff, or faculty of the research institution" as a vulnerable population. The Vulnerable Populations section will automatically populate for you to complete.
2. **Vulnerable Populations section:** Complete all the questions in this section as they apply to students as a vulnerable population.

Consent Document

1. **Alternative Procedures:** If class credit is given for participation in research, describe alternatives to taking part in the study.
2. **Voluntary Participation:** State that the decision to withdraw from the research will not involve a penalty and, if applicable, that class credit will not be taken away as a result.
3. **Compensation:** Describe how much class credit will be given for participation, if any.

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Office for the Protection of Research Subjects

Research Guidance Document

References & Links

<i>OHRP Informed Consent FAQs</i>	What constitutes coercion or undue influence when students are involved in research in a college or university setting? https://www.hhs.gov/ohrp/regulations-and-policy/guidance/faq/informed-consent/index.html
<i>U.S. Department of Education: Protecting Student Privacy</i>	https://studentprivacy.ed.gov/
<i>OVCRI: Understanding Student Data Use and FERPA</i>	https://research.illinois.edu/understanding-student-data-and-ferpa

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