

# Class Assignments & IRB Approval

(Adapted from University of Michigan's Research Ethics & Compliance)

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*This policy applies to student class assignments only.*

Some FUV faculty may design class assignments that involve questionnaires, interviews, or other interactions with individuals, such as those in research methods courses. In these cases, faculty should consider if such assignments should be reviewed by Institutional Review Board (IRB) to ensure the protection of human subjects.

## Student Class Assignment Definition

For the purposes of this policy *student class assignments* include activities that are:

- Supervised by the class instructor as part of student training and skills development
- Conducted during, or outside of class, with students enrolled in an official course (for credit or not for credit)
- Conducted in fulfillment of class assignments involving interactions with individuals other than the members of the class
- Designed to teach research methods through student interaction with individuals or data about individuals, or designed to help students understand concepts covered by the course
- Typically initiated and completed within a single term
- Not intended to disseminate new knowledge outside of the class" or to lead to scholarly publication

## Class Assignment and IRB Policy (please read thoroughly)

1. Important note: IRB will **NOT** review applications that are part of student class assignments from any 100-level courses and most 200-level courses (with only a few exceptions assessed on a case-by-case basis).
2. Student class assignments, as a general rule, **do not require IRB application, approval, or oversight**. This is because class assignments are not systematic data collection efforts intended to develop or contribute to generalizable knowledge
3. Most student class assignments **should pose little or no risk to students or others**. However, instructors should take special care to ensure that students realize the potential for harm and take all possible steps to eliminate the risks to students or individuals outside the class involved in the assignment. These risks may include physical harm, or potential psychological, social, economic, or legal harm, especially when data is collected about sexual activity, use of alcohol or illegal drugs, or involvement in illegal activities. Such risks can be exacerbated when the individuals outside the classroom are minors, pregnant women, prisoners, or people who are otherwise vulnerable, such as cognitively impaired persons.
4. Please see **instructor obligations in the Appendix** to consider and mitigate potential risks to individuals even when the class assignments are not under IRB jurisdiction. If

unsure about the level of risk involved in the study, please reach out to the IRB for consultation at [irb@fulbright.edu.vn](mailto:irb@fulbright.edu.vn)

5. Student class assignments that **are intended** to collect information systematically with the intent to develop or contribute to generalizable knowledge (e.g., publish or disseminate data) **meet** the US federal regulatory definition of "research." These class assignments fall under the jurisdiction of the IRB and require IRB application, approval and oversight. **Instructors wishing to use such assignments must apply to the appropriate IRB for review and approval of these assignments before they begin. Instructors must oversee the quality of the application prior to the submission.**
6. **Independent research projects** (e.g., Capstone projects, graduate theses) that involve data collection through interactions with living people or access to private information **must apply for IRB application.**

*Important note: Application to the IRB for student research projects that fall under 4 and 5 must include an endorsement and acceptance of overall responsibility by a faculty member to ensure high quality appropriate for future publication.*

## APPENDIX

### INSTRUCTOR OBLIGATIONS

Even when a class assignment is not under the jurisdiction of the IRB, faculty members have an affirmative obligation to ensure that students understand their ethical obligations in carrying out their assignments. Instructors should provide guidance to students collecting information so as to minimize any unwitting or unintentional harms to other students or to individuals, especially if students will interact with or collect private information about vulnerable individuals.

Faculty members may use a number of ways to educate students and encourage responsible interactions with others, including:

- Reviewing students' plans for classroom or group projects and suggesting improvements in design and protections for confidentiality
- Requesting that students take the IRB training on human subject protection before collecting information from others
- Explaining ways in which students should be attentive to the welfare of individuals in cases in which:
  - Vulnerable populations, such as young children, prisoners, or the cognitively impaired are involved
  - Any possibility of physical harm to the student or other individuals students will pose sensitive questions including topics related to sexual activity, victimization, use of alcohol or illegal drugs, or involvement in illegal activity
- Requiring printed instructions/information on questionnaires that explain the use of the data for coursework and include the name and contact number of the instructor
- Requiring, whenever possible, anonymous data collection so that the data are not linked to individuals
- Requiring that information identifying individuals be kept separately from the information collected from those individuals

- Requiring destruction of non-research data at the end of the course or within a short time afterward
- Instructing students about the privacy and security vulnerabilities associated with networked computers

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