Institutional Review Board (IRB) Handbook



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SNHU IRB Handbook

The *Institutional Review Board (IRB) Handbook* is designed to assist students, faculty, and staff who are seeking approval to conduct research while affiliated with Southern New Hampshire University. This includes all research involving human and vertebrate participants (including but not limited to all mammals, reptiles, birds, fish, etc.), dissertations, Applied Doctoral Projects (ADP), and other related research projects.

All students are encouraged to consult the chair of the IRB Committee with any questions.

TABLE OF CONTENTS

Section I: Principles of Research Involving Human Participants	5
Statement of Ethical Principles	5
Section II: Institutional Review Board General Information	6
Membership:	6
Terms of Service:	6
Training in Human Participants' Protection:	7
Responsibilities of IRB Chair:	9
Meeting Dates and Times:	9
Meeting Procedures:	9
Evaluation Quorum	9
Order of Business	10
Actions	
Closed Meetings	
Voting	
Conflict of Interest	
Minutes	11
IRB Records:	12
Section III: Submission Procedures	12
Criteria for Review (HHS 46.102 Definitions)	14
 No Risk Minimal Risk Moderate Risk High Risk 	14 14
Levels of IRB Review	15
Exempt Research	15
Expedited Research	16
Full Board Research	16
Continuing Review	17

Regulations and References	18
Documentation Required for IRB Review	18
Changes to Approved Research	18
Section IV: Data Collection	18
Informed Consent	18
Cultural Considerations	22

SECTION I: PRINCIPLES OF RESEARCH INVOLVING HUMAN PARTICIPANTS

Southern New Hampshire University (hereinafter referred to as SNHU) is committed to the highest ethical standards in the conduct of research. For projects involving humans as participants, SNHU is guided by the ethical principles set forth in the Declaration of Helsinki, the National Commission for the Protection of Human Participants of Biomedical and Behavioral Research's Ethical Principles and Guidelines for the Protection of Human Participants of Research: The Belmont Report. In addition, SNHU is committed to ensuring that all human participant research, regardless of finding source, follows the requirements set forth in <u>Title 45</u> Part 46 of the Code of Federal Regulations.

The IRB Policies and Procedures apply to all research involving human and vertebrate participants (including but not limited to mammals, rep tiles, birds, fish, etc.), funded or non-funded, sponsored or not sponsored, and conducted by SNHU students, faculty, and staff, on or off campus.

STATEMENT OF ETHICAL PRINCIPLES

The following broad principles are the basis for SNHU policy concerning review of research involving humans:

- Whereas the participation of humans in research projects may raise fundamental ethical and civil rights questions, all such research, funded and unfunded projects, sponsored and not sponsored, which is carried out by SNHU students, faculty, and staff, on or off campus, shall be covered by the Southern New Hampshire University Institutional Review Board (hereinafter referred to as IRB) for the Protection of Human Participants in Research Policies and Procedures covered by this document.
- All activities involving human participants must provide for the rights, safety, health, and welfare of each individual participant.
- The direct or potential benefit to the participant and the importance of the knowledge gained must outweigh any inherent risk to the individual.
- Participation in research must be voluntary and informed consent procedures must conform to the IRB Policies and Procedures.
- An individual does not abdicate any rights by consenting to be a research participant. A participant has the right to refuse to participate or may withdraw from research at any time without penalty or loss of benefits to which the participants would otherwise be entitled.
- Safeguarding information about an individual that has been obtained during an investigation is a primary obligation of the principal investigator.
- The primary responsibility for protection of human participants rests with the principal investigator and with support, approval, and monitoring by SNHU as set forth in the IRB Policies and Procedures.

SECTION II: INSTITUTIONAL REVIEW BOARD GENERAL INFORMATION

The purpose of the SNHU IRB is to ensure ethical research practice among its students, faculty, and staff. Individuals affiliated with SNHU who are conducting research projects must receive approval from the SNHU IRB before commencing the study.

MEMBERSHIP

University College (UC) IRB

The UC IRB shall have one chair, one vice chair, and up to twelve members one of which is unaffiliated with SNHU. The remaining members are representatives from each of the primary Schools (School of Arts, Science and Education, School of Business, School of Engineering, Technology and Aeronautics), with varying backgrounds, to promote complete and adequate review of research activities. The Vice President of Academic Affairs (VPAA) in conjunction with the chair shall appoint members of the IRB. The Chair is a voting member of the IRB and will be appointed by the VPAA.

Global Campus (GC) IRB (formerly COCE)

THE GC IRB shall have one chair, one vice chair, and representation across academic verticals with varying backgrounds, to promote complete and adequate review of research activities. The Vice President of Academic Programs (VPAP) in conjunction with the Chair shall appoint members of the IRB. The chair is a voting member of the IRB and will be appointed by the Vice President of Academic Programs.

Both IRB committees shall be sufficiently qualified through the experience and expertise of its members; their diversity, including consideration of race, gender, and cultural backgrounds, sensitivity to issues such as community attitudes; and promoting respect for its advice and counsel in safeguarding the rights and welfare of human participants. Members must also possess the necessary professional competence to review specific institutional commitments and regulations, applicable law, and standards of professional conduct and practice. IRB members shall be faculty and identified consultants with expertise in the field. Every effort will be made to ensure that the members of the IRB represent diverse backgrounds. The IRB shall not consist of members of a single profession or discipline. To comply with requirements for National Institute of Health or other funded proposals, the IRB may agree to add additional permanent or temporary members or consultants to review funded proposals. All IRB members maintain active Human Subjects and IRB Member training certificates supported by the National Institutes of Health (NIH) and the Office for Human Research Protections (OHRP).

TERMS OF SERVICE

Members of the IRB shall be appointed for terms of service up to three years. Members may serve consecutive terms as determined by the VPAA/VPAP and IRB chair.

TRAINING IN HUMAN PARTICIPANTS' PROTECTION

All IRB members, faculty, sponsors, principal investigators, and supporting investigators planning to submit or sponsor a proposal to the IRB will be required to complete the NIH CITI online training in human participants protections, which can be accessed electronically at: https://about.citiprogram.org/en/homepage/. Once registered select 'Social Behavioral Educational Research Investigators' or SBER. A Completion Certificate, obtained at the conclusion of this training, must be included in the Request for IRB Review, and must remain active through the entirety of the IRB review and approval, otherwise recertification will be required. More information on the process can be obtained by contacting the IRB at IRB@snhu.edu.

Below are instructions and a screenshot for registering for the CITI modules:

Begin working on the CITI Program Human Subjects Research: *Social & Behavioral Research Investigators* course. This training will take approximately 10 hours to complete.

To gain access to this course:

- 1. Review these <u>CITI Registration Instructions</u>
- 2. Navigate to the <u>CITI Program homepage</u> and click "Register" in the top right corner.
- 3. Now you are on Registration Step 1. Under "Select Your Organization Affiliation," type in "Southern New Hampshire University" and select it from the list of choices provided.
- 4. Complete steps 2-6 in full.
 - CEUs will be an additional charge and are not required for the course so this can be answered No.
- 5. For step 7, when choosing your course, be sure to select "Social & Behavioral Research Investigators" for Question 1 and "Not at this time" for Questions 2 and 3.
- 6. Use this screenshot below to help you choose the right course in the CITI Program.
- 7. Once in the Social & Behavioral Research Course, complete the Integrity Assurance Statement to unlock the modules.
- 8. For subsequent logins, you will click the blue "Log in" button on the <u>CITI Program</u> <u>homepage</u> to enter your username/password.



English -

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LOG IN

LOG IN THROUGH MY INSTITUTION

REGISTER

CITI - Learner Registration - Southern New Hampshire University	Select curriculum
Steps: 1 2 3 4 5 6 7	Instructions: Check only those options whic highlighted here. You are req
	to take the "Social & Behaviora
Select Curriculum	Research Investigators". Once click submit, it will appear as
	"Social & Behavioral Research -

* indicates a required field.

You will be provided a series of enrollment questions. Your responses will determine the curriculum for the courses you are going to take. Please read the questions carefully. Please read the responses carefully to make the best choice.

Click here to review the Southern New Hampshire University instructions page.

Human Subjects Research

Please choose one learner group below based on your role and the type of human subjects activities you will conduct. You will be enrolled in the Basic Course for that group.

Choose one answer

Biomedical Research Investigators: Choose this group to satisfy CITI training requirements for Investigators and staff involved primarily in Biomedical research with human subjects.

Social & Behavioral Research Investigators: Choose this group to satisfy CITI training requirements for Investigators and staff involved primarily in Social and Behavioral research with human subjects.

IRB Members: This Basic Course is appropriate for IRB or Ethics Committee members.

Students conducting no more than minimal risk research

Research with data or laboratory specimens- ONLY: No direct contact with human subjects.

Question 2

IRB Chair

Please make your selection below if you wish to be enrolled in the IRB Chair course.

Choose one answer

IRB Chair
 Not at this time.

Question 3

Responsible Conduct of Research

Please make your selection below to receive the courses in the Responsible Conduct of Research.

Choose one answer

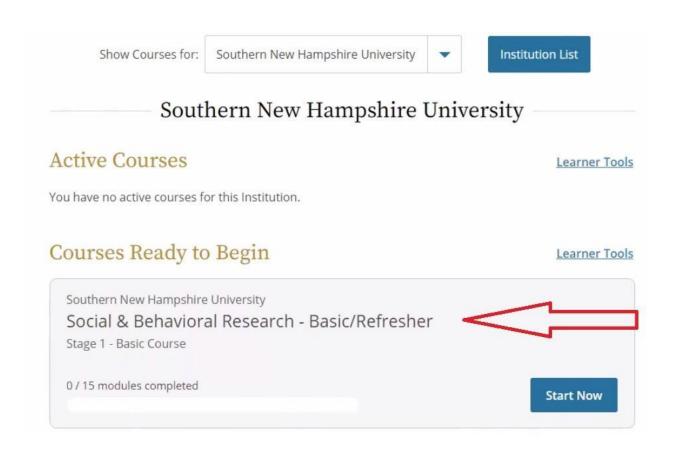
- Biomedical Responsible Conduct of Research Course
- Social and Behavioral Responsible Conduct of Research Course
- Physical Science Responsible Conduct of Research Course
- Humanities Responsible Conduct of Research Course
- Responsible Conduct of Research for Engineers
- Responsible Conduct of Research for Administrators

Not at this time.

Complete Registration

Need Help? Support Center

Question 1



RESPONSIBILITIES OF IRB CHAIR

The chair shall:

- Schedule and lead all meetings of the IRB.
- Notify members of meetings.
- Assign cases for review as appropriate.
- Ensure the timely disposition of all requests.

MEETING DATES AND TIMES

The IRB meetings are held when deemed necessary by the chair. Contact the IRB chair for a current schedule. The IRB chair may convene additional meetings as necessary to handle business. Members must be notified at least 72 hours (about 3 days) in advance of any such meetings and attendance should be seen as mandatory.

MEETING PROCEDURES

Evaluation Quorum

'No risk' or 'minimal risk' proposals may be evaluated by a majority of the IRB, the IRB chair, or a committee member appointed by the chair. Whenever possible, the appointed committee

member will have competence in the research area of the proposal. When moderate or higher risk proposals are considered, an IRB meeting will be scheduled, and a majority of IRB members must evaluate a proposal as needed. Outside reviewers, except in legal matters, must have a doctorate from an accredited institution, and submit a curriculum vitae (CV) and supporting documents to the chair. For a vote to pass, a quorum must be achieved, and a majority 'aye' vote must occur.

Order of Business

The agenda for IRB meetings shall be determined by the chair, and may include the following:

- Review of and action on minutes of previous meetings.
- Old and new business related to IRB functioning.
- Review and discussion of, and action, on (a) new proposals (in order of submission), (b) continuing proposals, and (c) substantive changes to previously approved proposals.
- Other business.

Actions

Proposals shall be approved, approved with revisions, disapproved, or tabled until a specified future date by majority vote of those members present.

Closed Meetings

To preserve the autonomy of the IRB and its decisions, IRB meetings are typically closed, if such closure is not in conflict with 45 CFR Part 46 or other applicable Federal, State, or local law and regulations.

- Anyone may speak for or against a proposal, but remarks must be based only on the Criteria for Approval as stated for each criterion of the IRB paperwork.
 - The chair may limit the duration of comments or the number of speakers for and against a proposal to serve the best interest of the committee functioning.
 - Written comments received by the chair prior to the meeting will be read into the minutes or distributed and appended to the minutes, insofar as they address the Criteria for Approval.
- The IRB chair may invite individuals with competence in specific areas to assist in the review of issues that require expertise beyond or in addition to that represented by the regular IRB members.

Voting

Only IRB members may vote.

Conflict of Interest

IRB members, and persons speaking or submitting written comments, must declare any potential conflict(s) of interest in advance. Members may speak for, but may not vote on their own proposals, proposals of students they are sponsoring, or any proposal in which an IRB member is

or is likely to be a participant. Written comments shall explicitly address any conflict of interest or its absence (in the event of a perceived conflict of interest that could be addressed for clarity).

Minutes

The analyst / designee of the IRB will keep minutes of the proceedings. The minutes must show attendance; actions taken by the IRB; the vote on these actions including the number of members voting for, against, and abstaining; the basis for requiring changes in or disapproving research; and a written summary of the discussion of controversial issues and their resolution.

Meeting with the IRB

A meeting between the IRB and the faculty, staff or student proposing a dissertation/ADP may be required only in cases of a Full Board Review, at the discretion of the IRB. The meeting, if required, may take place via teleconference. Exempt and Expedited Reviews do not necessitate that the PI meet with the Board. In cases of an Exempt or Expedited Review, the PI may proceed with solicitation of participants and data collection after receiving the formal IRB Approval Letter from the IRB Committee. Following a Full Board Review, the IRB will take one of the following actions regarding the proposal: "approved," "approved with conditions," "deferred," or "disapproved." Details regarding the possible actions are found below.

ACTIONS BY THE IRB

The following are the possible actions the IRB can take following a review of an IRB proposal.

Approved. The IRB will provide the principal investigator a letter indicating the start date and end date of the approval. If the researcher anticipates that the research will not be completed by the expiration date, the researcher should submit a <u>Request for Renewal form</u>.

Approved with Conditions. IRB requests that are approved with conditions necessitate those revisions and/or clarifications that address the issues raised by the IRB be submitted to the IRB. The IRB will also provide a list of documents required for resubmission. The IRB Chair may act on revisions, depending on the extent of them. The investigator must wait for written notification of approval after revisions are made before proceeding with solicitation of participants and data collection.

Deferred. A deferred decision is rendered when insufficient information is provided, or the meeting fails to meet quorum.

Disapproved. Applications are disapproved if the research does not meet the criteria for protecting participants and substantial changes would be required. No IRB request will be disapproved until it has been reviewed in accordance with the full review procedures set forth in this document. If the IRB disapproves a request for review of a research study, a written statement for the reasons for its decision will be given to the principal investigator. The principal investigator will have an opportunity to respond in person or in writing. Review of a previously disapproved protocol requires a Full IRB review.

Parallel IRB and Organization Permission. If approval of another IRB is required for a study to proceed, this University's IRB will review the proposal first and, when satisfied with the proposal, will "approve with conditions" the study with the only condition being that the researcher secures the necessary permission(s) from the other IRB(s). Once permission from the other IRB(s) has been obtained and submitted to this University's IRB, a full Approval Letter will be issued. The researcher can share that full approval with the other IRB if the other IRB(s) desires to have a copy it.

IRB RECORDS

The analyst / designee of the IRB shall keep the following documentation of IRB activities on file for at least three years:

- Written procedures for the IRB.
- A list of IRB members including name, earned degrees, representative capacity, indications of experience such as board certifications, licenses, etc., sufficient to describe each member's chief anticipated contributions to IRB deliberations, CITI certifications, and employment or other relationship between each member and the institution.
- Minutes of IRB meetings.
- Attachments of all proposals received, scientific evaluations (if any) that accompany the proposals, copies of all internal and external correspondence related to each submitted proposal, approved sample consent documents, progress reports submitted by investigators, and reports of injuries to participants (if any).
- Attachments of all correspondence between the IRB and the principal investigators for any study.
- Records of continuing review activities.
- Updating and maintaining the IRB repository (Cayuse).
- Statements of significant new findings provided to participants as required by the consent documents.

SECTION III: SUBMISSION PROCEDURES

SOUTHERN NEW HAMPSHIRE UNIVERSITY FULL-TIME FACULTY AND STAFF

All research involving human subjects, whether conducted by internal or external researchers must be approved by SNHU IRB prior to the recruitment of any SNHU student, faculty, staff, or alumni. At this time SNHU does not allow external applications. If an exception is in place, the external researcher must identify a regular, full-time SNHU employee willing to serve as a SNHU liaison for the entire research period and to assist in facilitating the application process.

Surveying of all on-campus or all global-campus students is prohibited and reserved for institutionally sponsored surveys and assessments only. Any exceptions require approval prior to beginning the application process. All faculty and staff proposals to conduct research must be submitted in Cayuse. If the research involves any SNHU students, faculty, or staff, approval from the college dean(s) impacted may be required. The investigator must obtain IRB approval

before undertaking the research and beginning data collection, to do so without approval would constitute research misconduct.

Following successful completion of CITI training proposals must be submitted through Cayuse IRB platform (<u>https://snhu.cayuse424.com/</u>). As noted previously, all principal investigators submitting proposals must undergo training as outlined above and submit all required documentation.

- Proposals should be submitted through Cayuse IRB (<u>https://snhu.cayuse424.com/</u>).
- Questions regarding research on the UC Campus should be sent to <u>IRB@snhu.edu</u>.
- Questions regarding research at Global Campus should be sent to <u>COCEIRB@snhu.edu</u>.

SOUTHERN NEW HAMPSHIRE UNIVERSITY DOCTORAL STUDENTS

Doctoral Students who have passed their Oral Defense of their Dissertation Proposal and completed the CITI modules may submit the Request for IRB Review. No studies can be conducted before IRB approval is granted.

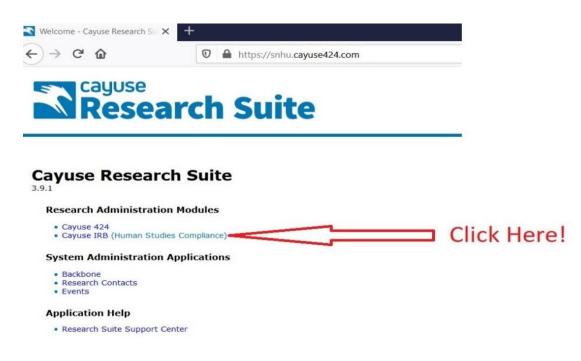
- Proposals should be submitted through Cayuse (<u>https://snhu.cayuse424.com/</u>).
- Questions regarding research on the UC Campus should be sent to IRB@snhu.edu.
- Questions regarding research at Global Campus should be sent to <u>COCEIRB@snhu.edu</u>..

The investigator must obtain IRB approval before undertaking the research and beginning data collection. Absolutely no solicitation of human participants or data access or collection may occur prior to IRB approval.

Instructions for submitting to Cayuse IRB platform:

First time users click here: <u>https://snhu.cayuse424.com/1678/firstSignIn.do</u> Note that your username is your SNHU email. External submitters please email <u>IRB@snhu.edu</u> for log in information.

To submit a proposal, go to Cayuse IRB dashboard at: <u>https://snhu.cayuse424.com/</u> Click Cayuse IRB tab: see screenshot below.



CRITERIA FOR REVIEW (HHS 46.102 DEFINITIONS)

Research proposals submitted to the IRB are evaluated with respect to the safety and protection of subjects according to the following levels of risk or danger to study participants. The primary task of the IRB is to weigh the actual or potential risks posed to participants against the possible benefits of the proposed research to the scientific community.

1) No Risk

Research participants face no physical or psychological stressors. An example of a no risk study would be a proposal to collect and analyze data sources with no human subject interaction.

2) Minimal Risk

Minimal risk (most common) means that the probability and magnitude of harm or discomfort anticipated in the research are not greater in and of themselves than those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations or tests.

3) Moderate Risk

Research participants face moderate physical or psychological stressors beyond those encountered in daily life. The potential benefits of the research must outweigh potential risks to study participants.

4) High Risk

Research participants face severe physical or psychological stressors beyond those encountered in daily life, which may have sustained, lasting effects. The potential benefits of the research must outweigh potential risks to study participants.

LEVELS OF IRB REVIEW

Exempt Research

Research in this category involves risks or stressors that are not greater than those ordinarily encountered in daily life or during the performance of routine physical or psychological examination. The IRB Chair must determine that a research study qualifies for an exempt review. **Researchers must not proceed with the research until written IRB approval has been received. Absolutely no solicitation of human participants or data collection is allowed prior to receipt of IRB approval, including pilot studies.**

Action on Exempt Research is taken within 5-7 working days of receipt by the IRB Chair or a Committee Member at their direction. Incomplete requests will be returned.

Research qualifies as Exempt if it falls in one of their following six (6) categories (note that not all types of research described below are, or are permitted to be, conducted at SNHU):

1. Research conducted in established or commonly accepted educational settings, involving normal education practices.

a) Special note for research in schools: For a study involving educational research (research conducted in classrooms) to be reviewed under the Exempt category, the investigator must supply a letter from the appropriate school district official that certifies that the study meets the following conditions. The research activities will:

i. Not differ in any significant way from the normal range of activities of the classroom, school, or district.

ii. Involve only customary and non-controversial instructional goals.

iii. Not deny any students' educational benefits they would otherwise receive.

iv. Promise direct benefits (at least in the form of evaluative information) to the classroom, school, or district.

v. Incorporate adequate safeguards to protect the privacy (e.g., anonymity or confidentiality) of all individuals who might be participants of the research; or

vi. Involve only existing data on students which are not identity specific.

2. Research involving the use of educations tests (e.g. cognitive, diagnostic, aptitude, and achievement test(s), survey procedures, interview procedures, or observation of public behavior, unless specific individual human participants can be identified, directly by or through identifiers linked to the participants, and disclosure of their identity could reasonably place the participants at risk of criminal or civil liability or be damaging to the participants' financial standing, employability or reputation.

3. Research involving the use of education tests (e.g. cognitive, diagnostic, aptitude, and achievement test(s), survey procedures, interview procedures, or observation of public behavior that is not exempt under category 2 of this section, if the human participants are elected or

appointed public officials or candidates for public office, or federal statute(s) require(s), without exception, that the confidentiality of the personally identifiable information will be maintained through the research and thereafter.

4. Research involving the collection or study of existing data, documents, records, pathological specimens, or diagnostic specimens, if these sources are publicly available or if the information is recorded by the investigator in such a manner that participants cannot be identified directly or through identifiers linked to the participant.

5. Research and demonstrations studies that are conducted by or subjected to the approval of department or agency heads, and that are designed to study, evaluate, or otherwise examine: a) Public benefit or service programs; b) Procedures for obtaining benefits or services under those programs; c) Changes in or alternatives to those programs or procedures; d) Changes in methods or levels of services under those programs.

6. Taste and food quality evaluation and consumer acceptance studies, if wholesome foods without additives are consumed or if a food is consumed that contains an ingredient at or below the level and for a use found to be safe, by the Food and Drug Administration or approved by the Environmental Protection Agency or the Food Safety and Inspection Service of the U.S. Department of Agriculture.

Expedited Research

To qualify for an expedited review, research must be no more than minimal risk and fall into nine federally defined expedited categories. These categories involve collection of samples and data in a manner that is not anonymous and that involves no more than minimal risk to subjects. Actions on Expedited Research typically take between 10-14 working days to review. Incomplete applications will be returned. Examples of Expedited Research include the following:

- Surveys and interviews with collection of identifiers.
- Collection of biological specimens (e.g., hair, saliva) for research by noninvasive means.
- Studies of existing pathological specimens with identifiers.

Full Board Review

Proposed human subject research that does not fall into either the exempt or expedited review categories must be submitted for Full Board Review. This is the most rigorous level of review and, accordingly, is used for research projects that present greater than minimal risk to subjects. Most of the biomedical and protected population research submitted to the IRB will require Full Board Review. Examples include the following:

- Clinical investigations of drugs and devices.
- Studies involving invasive medical procedures or diagnostics.
- Longitudinal interviews about illegal behavior or drug abuse.
- Treatment interventions for suicidal ideation and behavior.
- Protected populations include (should be avoided wherever possible):
 - Pregnant women

- Human fetuses
- Neonates
- Prisoners
- Children
- Individuals with physical disabilities
- o Individuals with mental disabilities or cognitive impairments
- Economically disadvantaged.
- Socially disadvantaged.
- Terminally ill or extremely sick
- Racial or ethnic minorities
- Institutionalized persons (for example, persons in correctional facilities, nursing homes, or mental health facilities).

Incomplete requests will be halted and returned. Action on Full Board Research requires a meeting of the IRB and may take up to thirty working days. For most efficient consideration of the Request for Full Review, all forms and materials must be submitted in Cayuse by the 15th of the preceding month. The IRB will review the submission and provide the researcher a list of concerns through Cayuse. At the IRB meeting the IRB Chair will facilitate the review of the issues and the research should be prepared to address each one in front of the IRB Committee. The IRB reserves the right to explore other issues besides those provided to the researcher. **Researchers must not proceed with the research until written IRB approval has been received. Absolutely no solicitation of human participants or data collection is allowed prior to receipt of IRB approval, including pilot studies.**

CONTINUING REVIEW

Federal regulations require re-evaluation of approved research at intervals that are appropriate to the degree of risk. At that time of its initial review, the IRB will determine the renewal date of the IRB approval. If the research study is going to continue past the expiration data, then the investigator must submit a Request for Renewal form. The principal investigator must submit the request for renewal in time for review and approval by the one-year anniversary date of the previous approval. The research should provide all information requested on the form; incomplete requests will be halted. If a researcher fails to provide continuing review information to the IRB or the IRB has not reviewed and approved a request for renewal by the continuing review date specified by the IRB, then the research study may not continue. No enrollment of new participants or data collection is allowed after the expiration of IRB approval.

The IRB may require continuing review of any research at more frequent intervals than 12 months whenever the degree of risk justifies such review. Additionally, the IRB has the authority to observe or have a third-party observe the consent process and the research process for a given study. These third-party observers are required to comply with confidentiality standards governing the ongoing research.

CHANGES TO APPROVED RESEARCH

Any changes to previously approved research, including, but not limited to, those that may change the risk/benefit ratio, must be approved by IRB prior to implementing the changes. In addition, the IRB must be notified of any changes in principal investigator(s) or faculty sponsorship. Principal Investigators must submit changes in Cayuse. Incomplete requests will be halted.

REGULATIONS AND REFERENCES

- Expedited review procedures for certain kinds of research involving no more than minimal risk, and for minor changes in approved research: DHHS 45 CFR 46.110
- Criteria for IRB approval of research: DHHS 45 CFR 46.111(a) (1-2)
- Code of Federal Regulations Title 21, Section 56.110: FDA 21 CFR 56.110
- Code of Federal Regulations Title 21, Section 56.111: FDA 21 CFR 56.111(a) (1-2)

DOCUMENTATION REQUIRED FOR IRB REVIEW

IRB Forms and sample documents are available on the <u>SNHU IRB webpage</u>. Submit electronic all attachments to your application in Cayuse.

Researchers may not collect data or proceed with their research until they have received written IRB approval. Collecting data without IRB approval is research misconduct and may result in additional consequences.

SECTION IV: DATA COLLECTION

This section is only applicable to those studies in which data is being collected. Data for any study may only commence <u>after</u> the principal investigator has received an IRB Approval Letter. When conducting research, the participants must agree to be a part of the research and the privacy and security of their information must be ensured. If data is being collected, a non-disclosure form is required and can be found on the SNHU IRB webpage.

Researchers may not collect data or proceed with their research until they have received written IRB approval. Collecting data without IRB approval is research misconduct and may result in additional consequences.

INFORMED CONSENT

An Informed Consent Form signed by each participant (sample provided in <u>Appendix G</u>), or the parent/guardian of each participant, is normally required for protocols submitted for either expedited or full reviews. It is also required when participants include vulnerable populations.

For any study in which children up to 17 years (unless emancipated) will be participating, informed consent must be obtained from their parents/legal guardians (sample provided in <u>Appendix H</u>). Informed assent may be obtained from minor participants if they are between ages 7 to 17 (see sample provided in <u>Appendix I</u>). An assent form is a written document used to inform the child of the study using age-appropriate language so he/she can determine whether to participate in the research. An assent form is presented to children over six years of age. If the

child is not yet able to read, procedures may be used to present the information verbally to obtain verbal assent. Certain studies may be exempt from the permission requirement (e.g., if the research is designed for conditions or for a participant's population for which parental or guardian permission is not a reasonable requirement to protect the participants (e.g., neglected or abused children; Source 45 CFR 46.408). Proposals of research to be conducted in an educational or other institution must include a letter of approval from the school district, hospital, or other institution.

Informed consent or assent must be obtained **<u>before</u>** any data can be collected. The informed consent and/or assent document must contain the following elements:

- Identification of investigator's name, department, institution, status, mailing address and telephone number. If the researcher is a student, the name, address, and telephone number of the Doctoral Research Chair must be included.
- A statement that the study involves research, an explanation of the purposes of the research and the expected duration of the participant's participation, a description of the procedures to be followed and identification of any procedures that are experimental. The informed consent form should tell the potential participant all s/he will encounter, how long it will take, where it will take place, etc. It should be written at a reading level appropriate for the particular participant. Consent forms should provide a description of the types of questions to be asked (e.g., "in this study we are exploring whether some people are 'at their best' at different times of the day. We will be asking you questions about your daily activities, your personality, and some basic demographic characteristics, such as your age, gender, and race.")
- A description of any foreseeable risks or discomforts to the participant. The following risks, if foreseeable, must be thoroughly explained:
 - When sensitive questions are to be asked, either examples of the most sensitive questions or an explicit description of these question should be given (e.g., "We will be asking you questions, the most sensitive of which might be: Have you ever considered committing suicide? Have you ever made yourself throw up after a meal? Do you enjoy looking at people of the same sex?")
 - When research gathers information about a participant's involvement in illegal activities and no Certificate of Confidentiality is held by the researcher, the researcher must provide a statement that questions regarding illegal activities will be asked as part of the research study. The researcher must state in the consent form that the possibility exists, although it is not probable, that the researcher's data could be subpoenaed and used again st the participant.
 - Suspected child abuse/neglect: When applicable, a statement should be included in the consent form that the researcher may report to appropriate legal authorities known or suspected child abuse or neglect, and circumstances or conditions which might result in abuse or neglect that become apparent because of a parent's participation or their child's participation in a research study.
 - If the participant incurs or may incur expenses because of participating in the project (e.g., medical or transportation expenses), the research must clearly state

whether the participant will be reimbursed for those expenses or if there will be no reimbursement for participating in the research.

- In a situation where a participant could be injured while participating in a project, the research must clearly explain any limitations of liability on the part of the researcher.
- A description of any benefits to the participant or to others that may be expected from the research. The following benefits, if mentioned, must be accurately described:
 - Possible benefits to society: Societal benefits should not be overstated. There may be no direct benefit to the participant, other than a sense of helping the public at large.
 - Payment of participants: Only include information on payment if payment is available. Any conditions for receiving the payment must be included in the consent form (e.g., if only partial payment will be made to a participant who withdraws from the study, the researcher must clearly explain the formula for partial payment). If payment is given to defray the incurred expense of participation, it must not be coercive in amount or method of distribution.
- A disclosure of appropriate alternative procedures or courses of treatment, if any, which might be advantageous to the participant. For example, in drug studies the medication(s) may be available through a family doctor or clinic without the need to volunteer for the research activity.
- A statement describing the extent to which confidentiality of records identifying the participant will be maintained. Federal Regulations stipulate that, where appropriate, proposals should include adequate provisions to protect the privacy of participants and to maintain the confidentiality of data. When a proposal does not explain if and how privacy will be maintained, participants cannot know the future status of their contributions to the study and so they cannot provide truly informed consent. The section on privacy and confidentiality should include the following statements:
 - Explaining how the participants' participation will either be known, kept confidential, or anonymous. Anonymity means that there is no way to identify an individual participant's responses. Confidentiality implies participants' identities are known but will be protected by the investigator (to the best of his/her ability). For example, if participants sign a consent form and their names are tied to their responses through a master list of names and code numbers, and in addition the coded responses are kept in a secure location, the participants' responses may be considered confidential, but are not anonymous.
 - How individual privacy will be maintained in publications or presentations.
 - Explaining what the dispositions of audio –or video-recordings will be at the conclusions of the study (e.g., destroyed, erased, given to participants, used for other purposes, such as advertising a product or procedure).
 - Explaining what the disposition of master lists (linking participants' names with data) will be at the conclusion of the study.
 - Within the consent form, researchers must clearly state that all research materials will be held for a period of no more than five years and what will occur with the

participant lists, data stored, etc. It must also be noted that collected data for this research will never be shared with any other researcher beyond what is publicly published.

- For research involving more than minimal risk, an explanation as to whether any compensation will be given, whether medical treatments are available if injury occurs and, if so, what they consist of, or where further information may be obtained. Note that the federal regulations (see CFR 46.102[g] do not limit injury to "physical injury."
- A statement that participation is voluntary, refusal to participate will involve no penalty or loss of benefits to which the participant is otherwise entitled, the participants may discontinue participation at any time without penalty or loss of benefits to which the participant is otherwise entitled, and that the participant has the right to refuse to answer questions.
- Identification of whom to contact for answers to pertinent questions about the research and research participants' rights, and whom to contact in the event of a research-related injury to the participant. The name and email address of the IRB Chair (IRB@snhu.edu) should be included should the potential participant wish to contact the IRB, should he or she have questions or concerns.
- All studies funded by federal agencies which require demographic information about gender and race/ethnicity must include the following statement: "This study is being funded by a federal agency which requires that data be collected in a form that may be analyzed for differences between men and women and races or ethnic groups."

When appropriate, one or more of the following elements of information shall also be provided to each participant:

- A statement that the particular treatment or procedure may involve risks to the participant (or to the embryo or fetus, if the participant is or may become pregnant) which are currently unforeseeable.
- Anticipated circumstances under which the participant's participation may be terminated by the investigator without regard to the participant's consent.
- Any additional costs to the participant that may result from participation in the research.
- The consequences of a participant's decision to withdraw from the research and procedures for orderly termination of participation.
- A statement that significant new findings developed during the research which may relate to the participant's willingness to continue participation will be provided to the participant; and
- The approximate number of participants involved in the study.

An investigator shall seek such consent only under circumstances that provide the prospective participant or the representative sufficient opportunity to consider whether to participate and that minimize the possibility of coercion or undue influence. The information that is given to the participants or the representative shall be in language understandable to the participant or the participant's representative.

No informed consent, whether oral or written, may include any exculpatory language through which the participant or the representative is made to waive or appear to waive any of the participant's legal rights or releases or appears to release the investigator, the sponsor, the institution, or its agent from liability for negligence.

The IRB may approve waiver of the requirement of a signed consent form in the following cases:

- The only record that links the participant to the research is the signed consent form, and the principal risk to the participant would be a breach of confidentiality. In this case, participants must be asked if they want to sign a consent form that links them to the research.
- The research presents no more than minimal risk of harm to the participants and the research involves no procedures for which written consent would be required outside of the research context. If the research involves more than "minimal risk," then no waiver or alteration of informed consent is allowed.
- The research could not practicably be conducted with the waiver or alteration.

In these cases, the IRB may require the investigator to provide participants with information sheets to retain (e.g., an information letter that contains the information normally included in a consent form, but with no signature line).

CULTURAL CONSIDERATIONS

In some cultures, an investigator may enter a community to conduct research or approach prospective participants for their individual consent only after obtaining permission from a community leader, a council of elders, or another designated authority. Such customs must be respected. In no case, however, may the permission of a community leader or other authority substitute for individual informed consent. In some populations, the use of a number of local languages may complicate the communications of information to potential participants and the ability of an investigator to ensure that they truly understand it. Investigators should develop culturally appropriate ways to communicate information that is necessary for adherence to the standard required in the informed consent process. They should describe and justify in the research protocol the procedure they plan to use in communicating information to participants. When consent forms need to be translated into different languages, the IRB will need to see copies of those translated forms, along with evidence (through back translation) that the pertinent information has been included.