Human Subjects Committee Review of Student Projects

**Review of student projects involving human subjects**
University policy requires that all research projects involving human subjects be reviewed by an institutional review board (IRB) prior to the start of the study to ensure that the project meets University requirements and any applicable regulations. The Human Subjects Committee (HSC) is one of the University IRBs which reviews non-biomedical research projects. The HSC has much experience in thinking through the issues involved in student projects involving human subjects and can be a helpful resource. HSC review is required for projects that qualify as both research and involve human subjects, as described below.

**What is research?**
Simply put, research looks at one set of circumstances and tries to make conclusions that can be applied to, or be predictive of, other similar circumstances.

**What is a human subject?**
A human subject is a living person about whom an investigator gets identifiable private information through either a direct interaction with the person or through access to private data sources.

**Examples of student projects that require IRB review:**
- Interviews and surveys, including on-line surveys, that collect identifiable information, including instances when pseudonyms or codes are used and these pseudonyms/codes can be linked through a key to the identities of individuals.
- Observational studies where the individuals’ identities are known or which take place in private locations or locations with a presumption of privacy. For example, on-line chat rooms, dorm common rooms, private homes etc, are considered to be “private.”
- Psychological studies.
- Focus groups
- Use of existing identified data sets which are not publically available.
- Collection of biological specimens such as saliva, blood, or buccal swabs.
- Studies involving children, prisoners, decisionally impaired or other vulnerable populations.
- Collection of physiological data such as skin conductance, pulse rate, etc.

**Examples of student projects that do not require IRB review:**
- Interviews or surveys which do not collect information about a person, such as interviews on government or corporate policies.
- Interviews regarding historical events which are intended to describe the event and not to be predictive of human behavior in other future events.
- Analysis of existing anonymized data.

When in doubt, the Human Subjects Committee (HSC) can provide assistance in determining if a given project must be reviewed under Yale policy. Send an email to human.subjects@yale.edu providing a brief description of your project or call 785-4688.

**What to do if your project requires review:**
1. Go to the HSC website and fill out an application: [http://www.yale.edu/hrpp/forms-templates/behavioral.html](http://www.yale.edu/hrpp/forms-templates/behavioral.html)
2. Hand in/e-mail the application to the HSC along with any materials you will be giving to subjects such as consent forms or questionnaires.

Things to think about when designing a research study involving human subjects:

- Think about the culture, political situation and experiences of the subjects you want to study, and make sure your study is respectful to them and their values. Remember that what may be an acceptable question to one group can be upsetting or even inflammatory to another group.

- Think about risks and benefits the subjects will have during the study, or because of their participation in the study. Is there a way you can minimize the risks? Risks include potential psychological, social, financial, and judicial harms as well as physical harm to the participants. Consider whether there could be participants who are more likely to experience harm then others. Most risks in non-biomedical studies involve risk of harm from disclosure of information about the subject or disclosure of the subject’s responses to the study questions. These harms can be minimized by adequately limiting the possibility of a breach of confidentiality through data security and confidentiality protections as necessitated by the sensitivity of the data..

- Think about special, vulnerable populations such as children, economically or educationally disadvantaged, or those who may have a limited ability to make decisions for themselves. If it is necessary that the study include a vulnerable population, special precautions may be needed, such as getting a parent’s or caregiver’s permission to speak with the vulnerable person.

- Limit the subject identifiers that will be recorded. If possible, try to design the study so that subject names or other information that could specifically identify a person (such as date of birth) are not recorded. Studies which do not collect any information that could be used to identify the individual are considered anonymous. Note that even without names or other direct identifiers, data wouldn’t be anonymous if the demographics recorded are sufficient to allow identification of the individual participants.

- If you need to collect names or other information that could identify an individual person, keep the information confidential. The HSC suggests creating a list that contains a link between the subject’s name and a random code number or pseudonym, and then using only the code number/pseudonym to mark the data and responses from that subject. The list that contains the coded link should be kept secure, and separate from the data and responses. That way, the subject’s data is kept confidential.

- In all cases, the investigator should inform subjects about:
  - the purpose of the study
  - what is involved and how much time it will take
  - whether there are any risks or benefits to being in the study
  - how their identity or information they provide will be kept confidential
  - that being in the study is voluntary and that they can decide they no longer want to be in the study at any time.