Foothill-De Anza Community College District
Class Projects and Human Subjects Research
Flow Chart and Procedures

Does a class project require IRB review?

<table>
<thead>
<tr>
<th>Is the project a senior capstone project or honors thesis?</th>
<th>→ Yes → Possible IRB Review</th>
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<td>No</td>
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<tr>
<th>Is the project solely for a class assignment where data will not be used outside of the classroom context and data are destroyed at the end of the project with no further use?</th>
<th>→ No → Possible IRB Review</th>
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<th>Does the project involve protected populations or the collection of sensitive information? (See examples on next page.)</th>
<th>→ No → IRB Review NOT Required</th>
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<td>Yes</td>
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IRB Review Required

If you have questions on whether your project requires IRB review, please contact the Office of Institutional Research & Planning:
District: David Ulate – ulatedavid@fhda.edu
De Anza: Mallory Newell – newellmallory@fhda.edu
Foothill: Elaine Kuo – kuoelaine@fhda.edu
Research on protected population or sensitive information that may require IRB review

*Protected Populations* – Examples include, but are not limited to:

- Children/Minors (under the age of 18) *(Exception – projects conducted in established or commonly accepted educational settings involving normal educational practices.)*
- Prisoners (now includes non-publicly available secondary data)
- Pregnant women
- Fetuses and products of labor and delivery
- People with diminished capacity to give consent
- Mentally or physically challenged individuals

*Sensitive Information* – Examples include, but are not limited to:

- Information relating to an individual’s psychological well-being or mental health
- Information relating to sexual attitudes, preferences, or practices
- Information relating to the use of alcohol or drugs
- Information relating to illegal behavior
- Information that if released could reasonably place the individual at risk of criminal or civil liability or be damaging to the individual’s financial standing, employability, or reputation
- Information that would normally be recorded in a patient’s medical record and the disclosure could reasonably lead to discrimination, stigmatization, etc.
- Information relating to personal identity information that could lead to misuse and put individual at risk (SSN, CWID, birthdate, tax information, residency status, etc.)
If a class project does not meet the definition of research and does not require IRB review, the following guidelines should be met:

- It is the responsibility of the instructor to ensure that the student project does not meet the definition of research.
- It is the responsibility of the instructor to ensure that the class project is conducted according to the ethical standards of the relevant discipline. If unsure, contact the Office of Institutional Research & Planning (or the college-based researcher).
- Remember that from the participant’s viewpoint, giving out personal information does not differ for a class assignment or a research project. Personal information is personal information. Instructors should advise students to identify the project to participants as a class assignment and be sensitive to the personal nature of the obtained information. Labeling the class project as “research” is inaccurate and misleading to participants.
- Students should inform participants that data will be destroyed after their assignment or class project is completed.
- Instructors are advised to tell students that data from human subjects should not contain any personal, identifying information whenever possible.
- All class projects must include informed consent language that closely follows the guidelines. Information on what to include in a consent form/script is described on the following page. For an online web-based survey, this would be the first page of the survey or in the email invite.
Information to Include in Email Postings or Verbal Scripts for Informed Consent

When information is collected for a class project that does not meet the definition of research (as defined by the federal regulations) and does not require approval by the IRB, it is still important to “inform” the participants about the class project, whether in an email message or presented verbally in person. Make sure the participant is told:

- The identity of the student (introduce yourself!). (This may not always be necessary, as many students enlist the help of friends or family to collect data for a class project.)
- They must be at least 18 years of age to participate.
- It is a class project. (Give a little information, e.g., This is for my psychology class, I am trying to see if there is a relationship between X and Y.)
- What they will be asked to do (“I would like to ask you some questions about why you chose to attend Foothill College. If there are any questions you don’t want to answer, it is fine to skip them.”).
- How long the interview, survey, etc., may take to complete.
- What will happen to the information collected (“The information will be used to write my paper for the class, and I will give a presentation in class. All of my notes, surveys, etc., will be destroyed when the project is completed.”)
- If they will be identified: examples: “I will not write your name on my notes”; “Do not write your name on the survey;” “I will not use your name in my paper.”
- The student’s and instructor’s contact information if they have any questions (provide email/phone).