



of the American Alliance for Health, Physical Education, Recreation and Dance

### **IRB Approval for AAHPERD Research Consortium (RC) Consideration**

**All papers, posters, and symposia reporting research data must have formal IRB approval/exemption prior to RC abstract submission.**

Research papers, posters, and symposia submitted for presentation at the annual AAHPERD convention are subject to federal regulation, 45 CFR 46, 21 CFR 50, and 21 CFR 56, and reflect the ethical principles outlined in *The Belmont Report*; respect for persons/autonomy, beneficence, and justice. Institutional Review Boards (IRBs) [or similar body] were established by federal mandate to assure compliance with these regulations regarding the protection of human research participants.

This FAQ has been written to assist researchers, teachers, coaches and international authors in the process of submitting completed research to the AAHPERD Research Consortium for presentation on the RC Conference program at the AAHPERD National Convention. This document is focused primarily on Human Subjects research. For specific inquiries about IRB, the reader is directed to the IRB Administrator at her/his respective institution.

The RC acknowledges that IRB review procedures *vary substantially* from institution to institution. Thus, the RC does not attempt to determine the unique conditions, risks, etc. that are or are not acceptable. The RC does, however, require that authors certify that their research has met the federal policy for the protection of human subjects. Only an institution with a United States Department of Health and Human Services federal wide assurance (FWA) on file (basically a contract with the government stating that the federal regulations will be followed) can grant this approval/exemption. FWA-authorized institutions can include universities, medical research hospitals and organizations, and independently authorized agencies. There are many independent IRBs in the United States that provide reviews for entities (e.g., local agencies, small school districts) not having an approved FWA. In addition, it is not uncommon for institutions of higher education to provide reviews for local agencies or school districts that do not have an approved FWA. Usually there will be a fee associated with such reviews.

Risks: It is well recognized that the greatest risk associated with most social, behavioral, and education research (SBER) pertains to a breach of **confidentiality**. Potential **undue influence or coercion** to participate in a research project also is a concern in educational research, particularly when a teacher wishes to use her/his own students as research participants. Many institutions have policies prohibiting such practice.

Teacher/coach collected student/athlete data: In educational research, particularly in what some refer to as action research, it is often difficult to distinguish normal educational activity (for which IRB approval is not required) from research activity. For example, teachers/coaches administer tests (e.g., FITNESSGRAM®) and gather data/information from students/athletes in their classes on a regular basis. Such data collection may not require approval from anyone, the principal, parent, athletics director, or local IRB/ethics board. **It is the use of these data for research purposes** that brings the federal regulations and IRB approval into the picture. In some cases, the IRB might determine that the activity does not meet the federal definition of research and therefore does not require review and approval. An example of this could be a situation in which a researcher is provided with aggregate data or data that do not contain identifiable private information. In other situations, the activity may be judged as meeting the federal definition of research, but it is determined as being “Exempt” in accordance with 45 CFR 46.101. But again, this determination should be made locally by the FWA approved Institutional Review Board. Thus, an IRB review is still necessary.

School districts or other entities without FWA authorized Ethics Boards or IRBs: Many school districts, particularly smaller districts, and community organizations do not have an ethics board or an IRB. In order for the researcher/teacher to state that the research has met the federal policy for the protection of human subjects, **it must have been reviewed and received approval from an institution with a DHHS federalwide assurance (FWA) authorization on file.** Thus, in the absence of an approved FWA, approval to conduct a research study from the building principal or superintendent is insufficient. Although local school district policy may require approval from the principal, superintendent, or even a local committee, such approval **is not a substitute** for approval from an FWA-approved IRB.

### **Frequently Asked Questions:**

Q1: Can my principal or superintendent approve my research?

*Principal or superintendent approval of the research is not sufficient to constitute a formal review in accordance with federal policy for the protection of human subjects and Research Consortium guidelines. Approval may only be granted by a FWA-authorized agency, such as an Institutional Review Board.*

Q2: My school district sends out a blanket permission form for testing, pictures, etc. at the beginning of the school year. Does a parent signature on this form meet the conditions for parental permission for my research?

*Blanket (all inclusive) parental permission given at the beginning of the school year, for example, does not meet the expectations of federal regulations or the Research Consortium. Separate approval by a FWA-authorized agency is required.*

Q3: My school district is very small and does not have a designated research director, office, or committee to review research proposals. Permission is usually granted by the school principal. In this case, can I submit my research?

*Federal regulations require a formal review of the research by individuals formally trained in the responsible conduct of research and protection of human subjects in accordance with applicable regulations (e.g., 45 CFR 46 and NOT-OD-10-019). If your school district does not have an approved federalwide assurance on file with DHHS or cannot provide a review by an approved IRB, you may not submit the research findings to the Research Consortium. Prior to conducting research, check with your local university to determine if their IRB will review your research.*

Q4: I think my research should be categorized as “Exempt” because the data reflect fitness test scores that I collect every year in my classes. Do I still need to submit my research for IRB review?

*Yes. IRB approval must be obtained prior to submitting the findings in an abstract to the Research Consortium. Although the research may not require a review by a full panel, the local IRB will make that determination.*

Q5: I am a researcher at an institution in another country. We do not have an IRB or ethics board to review our research. Can I still submit my research findings to the Research Consortium?

*The RC requires the same level of protection for human research participants in research conducted in other countries as is required in the US. The Principal Investigator (PI) must demonstrate that a commensurate level of review and approval has been obtained. Although 45 CFR 46 may not specifically apply to research conducted outside the United States, other ethical codes of research conduct may have application (e.g., Nuremburg Code, Helsinki Declaration).*

Q6: I have obtained non-identifiable individual level data from a local school district. I was not involved in the collection of the data nor can I ascertain the identity of any of the subjects. Do I still need to obtain IRB review and approval?

*In order to submit an abstract or paper to the Research Consortium, the PI must certify that IRB approval was obtained.*

Q7: I am not conducting an experiment or subjecting my students to any treatment condition. I am only conducting a short survey that does not involve any embarrassing or threatening questions. Do I still need IRB approval before I can submit my findings to the Research Consortium?

*Yes, federal regulations and Research Consortium policy require IRB approval for this type of research activity. Federal regulations do not permit exemptions for survey research involving children.*

Q8: I have accumulated a considerable number of student test scores, portfolio information, and survey data over the years that I have taught. None of these students are currently in my class. If I keep identities private, can I analyze this existing information and submit an abstract to the Research Consortium without obtaining some type of formal approval?

*No, IRB review and approval is still required, even though the data currently exist and were collected in your capacity of being the students' teacher at the time.*

Q9: I am only conducting an action research study to evaluate the effectiveness of my own teaching to satisfy the research requirements for National Board Certification. I do not intend to publish the research, but I would like to present my findings in a Research Consortium poster session. Do I still need IRB approval before I can submit something to the Research Consortium?

*Yes, IRB review and approval is still required. Depending upon local IRB policy, your project may be determined to be Exempt under federal guidelines or it may be judged to not require review by a full panel, but that determination will be made by your local IRB.*

Q10: Can the Research Consortium review my research to satisfy the requirements for IRB approval?

*No, the Research Consortium does not have FWA authorization and does not review research for the purpose of providing IRB approval. You will need to obtain IRB approval from an institution that has special FWA authorization (called a Federalwide Assurance) from the government to review research to insure the protection of human research participants.*

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