

## **IRB COMMITTEE MEETING MINUTES**

Electronic meeting to approve changes to language on Project Application  
January 17, 2018

Chair sent an email to the committee proposing new language on the Project Application. The current application contained a misinterpretation of the federal regulations governing human subjects research, which caused certain projects that should be exempt to be brought under greater IRB scrutiny than required.

Information on the regulations and proposed change provided were:

Here is what the regulation states:

(2) Research involving the use of educational tests (cognitive, diagnostic, aptitude, achievement), survey procedures, interview procedures or observation of public behavior, unless: (i) information obtained is recorded in such a manner that human subjects can be identified, directly or through identifiers linked to the subjects; and (ii) any disclosure of the human subjects' responses outside the research could reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing, employability, or reputation.

Here is how this regulation is interpreted on our application:

☐ Tests, interviews, and surveys are unlikely to elicit emotion or place subjects at risk of civil/criminal liability or damage to their reputation, financial standing, employability etc. AND information will not be recorded in such a way that subjects can be identified.

Our interpretation indicates that under no circumstances should information be traced back to subjects. This is not what the regulation actually means, though. It is only stating that research is not exempt if the information could be harmful and participants are identifiable.

Here is how I have reworded our application:

Tests, interviews, and surveys are unlikely to elicit emotion AND will not place subjects at risk of civil/criminal liability or damage to their reputation, financial standing, employability etc. if information will be recorded in such a way that subjects can be identified.

The chair also provided links to the NIH website with further information about exemption requirements.

Hilary Virtanen and Rekha Ambardar approved the changes on 1/17/18. Suzanne Miron approved the changes on 1/18/18. On 1/18/18, the chair copied the IRB's Head Official, Fredi de Yampert, on an announcement that the vote had been unanimous.

On January 19, 2018, the chair emailed Tracy Henderson about putting the new Project Application form on the IRB page of the website. The new application went live on January 20, 2018.