



**Franciscan Missionaries of Our Lady University Institutional Review Board  
(FranU IRB)**

**Policy on Students as Research Subjects**

This policy statement is for:

- Investigators who are considering research that includes FranU students as subjects.
- FranU students who are considering participation as a subject in research approved by the FranU IRB.

The following policy is informed by:

- Office of Human Research Protection (OHRP) guidelines.
- Collaborative Institutional Training Initiative (CITI) guidelines.
- Current FranU IRB policies and procedures.
- The policies of peer institutions.

Investigators who wish to conduct research using FranU students as subjects must follow the guidelines described in this document.

The risks—perceived or actual—of coercion and undue influence are particularly acute in research with students. As part of its charge to protect human subjects, the FranU IRB has created the following guidelines in order to minimize these risks:

1. Investigators who wish to use FranU students as their research subjects must provide a clear and sufficient justification for doing so.
  - a. Investigators must explain the scientific justification for researching a student population.
  - b. Convenience, alone, is NOT a sufficient justification for relying on students as subjects. This does not necessarily exclude convenience sampling.
  - c. A possible justification is that participation in the research provides an educational opportunity for students.
2. If research is deemed greater than minimal risk, then written permission from the Head Official of the Institution Responsible for Overseeing the Activities Performed by the IRB is required.
3. The recruitment and informed consent processes must minimize coercion and undue influence through at least the following measures:
  - a. Recruitment advertisements should be aligned with the FranU IRB Research

Advertisement Worksheet that is posted on the IRB web site

- b. Students must be provided an informed consent form that includes all information necessary for their consent, if provided, to be sufficiently voluntary and informed. If appropriate, this requirement can be waived by the IRB. A basic informed consent template as well as a waiver request is available on the IRB web site.
4. Participation must be voluntary.
    - a. Participation may be incentivized by offering extra credit or some other appropriate reward, but students must be provided and informed of non-research alternatives involving comparable time and effort to earn the reward.
  5. Refusal to participate must not be penalized.
  6. Withdrawal after research has begun must not be penalized.
  7. Any recruitment or research activity occurring in a FranU classroom, event, or service must first get documented permission from the instructor, relevant administrator, or faculty advisor.
  8. Especially when research activities appear similar to or overlap with normal coursework, the investigator must make sure that all students in the affected course clearly understand what are voluntary research activities and what are regular (non-research) course activities.

If the investigator is conducting research with his/her own students, the following guidelines must also be satisfied:

- The recruitment and informed consent processes must be conducted by someone who does not have a current or imminent status relationship with the potential subjects.
- Students must be offered the opportunity to participate but withhold use of their data.
- If class time is used, the research must provide an educational opportunity—for the students—that is clearly relevant to the course.
- Whenever research is conducted during a class session, the instructor must be blinded to the identity of the participants at least until grades are posted.