

Best Practices for Classroom Activities Involving Living People

Intended Audience: This document should be used by faculty who instruct, or permit, their students to engage in course-based activities that involve: a) living people; b) the private, identifiable information of living people; or c) identifiable biospecimens.

The USU IRB recognizes that high-impact practices which maximize student engagement and learning often involve hands-on activities. The IRB celebrates our faculty's commitment to providing excellent learning opportunities for USU students. USU also recognizes the need to protect persons who support our students' learning by lending their time, effort, and participation in research-related activities. Previously, the USU IRB exercised oversight regarding classroom activities that involved living people but did not meet the regulatory definition of "research."

Research means a *systematic investigation (including research development, testing, and evaluation) designed to develop or contribute to generalizable knowledge.*

The IRB sought to deregulate activities that **do not meet the regulatory definition of research**, and as of summer 2019, no longer reviews those projects. Instead, the IRB offers some best practices that assist faculty and other instructors in balancing the need for rigorous pedagogy and optimal protection of human participants in class-based activities. We suggest that instructors implement the following recommendations:

- Have students who will work with living people, their private identifiable information, or biospecimens to take [CITI training](#). CITI assists students and instructors alike in recognizing the line between classroom activities and "regulated research," teaches students about the importance of privacy and confidentiality, provides overviews of other important laws ([FERPA](#), [PPRA](#), [HIPAA](#)) that might apply regardless of IRB oversight, and provides examples of unacceptable research practices commonly observed throughout our nation's history.
- Work with students to **provide documentation to participants** about the activity, its purpose, and the privacy and confidentiality measures you have put in place with your students (e.g. a brief information letter).
- Limit classroom-based activities to those within the [exempt categories](#). Not only does this ensure that your students are consistently engaging in minimal risk activities, but it also permits you to transition classroom activities into an IRB-approved research project if the project transitions to "research" as defined above.
- Ensure that the classroom-based activities are minimal risk. For example, participants should not be queried regarding sensitive material (e.g., 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). That level of activity is more appropriate for a seasoned researcher with ample training and experience regarding human subject research protections.
- Video recordings are not recommended. Audio recordings may be advisable, if they are necessary to the teaching method being utilized in the course. Please note that if audio recordings are taken, they should be destroyed prior to the end of the course.
- Avoid the use of deception, misinformation, or incomplete information. Again, this level of research activity is more appropriate for a seasoned researcher with ample training and experience regarding debriefings, data withdrawals, and other advanced issues related to consent.
- Provide close oversight of the data, which should remain with the instructor. Ensure that data are timely de-identified and destroyed or returned to the participants.

Instructors are welcome to have their students submit Non-Human Subjects Research Determinations to the IRB, so that all parties can be sure that their projects would not require IRB oversight. Instructors are encouraged to contact the IRB ahead of those submissions, so that IRB staff understand that the requests are in the context of a classroom-based activity.