Creighton UNIVERSITY

CU IRB and Me:

STUDENTS AS RESEARCH PARTICIPANTS

Agenda

- Students as research participants
  - Why students are a special population
  - Ethical considerations
  - Faculty recruiting their own students
  - Strategies to minimize coercion and undue influence
  - FERPA considerations
  - Examples of how to minimize the risk of coercion and/or undue influence
- Resources
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  - Contact us
- Metrics – January through May 2026
  - Turnaround time
  - Submissions
  - Active studies
- Q & A

Students as Research Participants

Why Students are a Special Population

Students are not a federally designated vulnerable population.

Faculty-student relationships may create:

- Power differentials
- Real or perceived pressure to participate
- Concerns about voluntariness

Examples of faculty-student relationships:

- Grading responsibilities
- Mentorship relationships
- Letters of recommendation
- Future coursework

Takeaway:

- Additional safeguards may be needed to support voluntary participation.

Ethical Considerations

Voluntary Participation

- Voluntariness
- Coercion
- Undue Influence

Study Design

- Fair Subject Selection
- Appropriate Recruitment Strategies

Key Question

- Can students freely choose whether or not to participate?

Faculty Recruiting Their Own Students

Why does the IRB review these studies carefully?

- Potential power differentials
- Real or perceived pressure to participate
- Concerns regarding voluntariness

When may it be appropriate?

- Students are the most appropriate population
- The research question cannot be answered as effectively using another population

Additional safeguards may include:

- Third-party recruitment
- Delayed access to participant lists
- Alternative participation options

Strategies to Minimize Coercion and Undue Influence

Concern	Examples of Safeguards
Students may feel **pressured to participate**	Use a third party to recruit participants
Students may **worry participation could affect grades**	Blind grading or delay access to participant lists until final grades are submitted
Students may feel **participation is required**	Offer a comparable non-research alternative for equivalent credit
Students may feel **identified by participation**	Limit access to participation records and identifiable information
Recruitment language may unintentionally **influence decisions**	Clearly state the voluntary nature and how it will NOT affect grades
Incentive may **influence decision-making**	Ensure incentives are reasonable and not tied to academic standing

FERPA Considerations

Family Educational Rights and Privacy Act (FERPA) applies to human subject research by restricting access to **Personally Identifiable Information (PII)** in education records.

FERPA rights are given to parents of minor students not enrolled in postsecondary institutions. These same rights afforded to parents are then transferred to students when they turn 18 years of age or when they enter a postsecondary institution.

Researchers must obtain written student consent to use FERPA protected academic data, unless an exception applies such as:

- using de-identified data or
- conducting studies exclusively for the institution and not for the purpose of developing or contributing to generalizable knowledge.

EXAMPLES

Minimizing the Risk of Coercion and/or Undue Influence

When Faculty Conduct Research With Their Students

EXAMPLE 1: Anonymous paper survey

- At the end of class, the instructor/researcher provides students with a copy of the consent form (Research Information Sheet), discusses the study with the students, answers any questions, and then leaves.
- A third party (e.g. graduate assistant, individual from the department, another faculty member) distributes the paper surveys, allows time for the students to read the Research Information Sheet, and collects the completed surveys.
- The surveys are given to the instructor/researcher after all are collected.

Example 2: Survey with identifiers

- The identifiable survey data will be linked to students' final exam scores. Therefore, a signed consent is required by FERPA.
- At the end of class, the instructor/researcher provides students with a copy of the consent form, discusses the study with the students, answers any questions, and then leaves.
- A third party is used the same as in the first example, but *signed* consent forms and identifiable surveys are collected and placed in a sealed envelope.
- The third party keeps the sealed envelope in a locked file cabinet until after the class grades are submitted. Only then are the completed consent forms and surveys provided to the instructor/researcher.

Example 3: Accessing students' academic records

- A third party emails a study flyer or forwards a study recruitment email to students. Students are instructed to contact the researcher directly if they have questions about the study. Students click on a link to provide a signed electronic consent. Per FERPA, a signed consent is required because the work is identifiable to the instructor/researcher.
- The third party stores the *signed* e-forms in a secure location.
- Once the class grades are finalized the completed consent forms are provided to the instructor/ researcher who can then collect and analyze the work products of those students.

Resources

CITI Webinars

Available webinars relevant to today's topics

- Working with Your IRB (ID: 317832)
- Data Management and Security for Student Researchers: An Overview (ID:317857)
- The Importance of Mentorship in Biomedical and Behavioral Research (ID:317742)

CU IRB Website

https://www.creighton.edu/research-services/committees-and-boards/institutional-review-board-irb

Revised Guidance Documents

Templates

- Revised Informed Consent Template
- Revised Parent/Guardian Permission Template
- Revised Assent for Ages 7-12 Template
- Revised Assent for Ages 13-18 Template
- Revised HIPAA authorization
- Protocol Template
- NHSR/QI Proposal Template **NEW**
- Checklist: Does my Project Require IRB Review?

Forms

- Post-Approval Monitoring (PAM) Forms section **NEW**
  - Delegation Log **NEW**
  - Protocol Deviation Log **NEW**
  - Adverse Event Log **NEW**

https://www.creighton.edu/research-services/committees-and-boards/institutional-review-board-irb/investigator-resources

Help us help you

Our goals

- Provide meaningful education and guidance to the research community
- Support researchers for the lifetime of their studies

IRB Booking Page

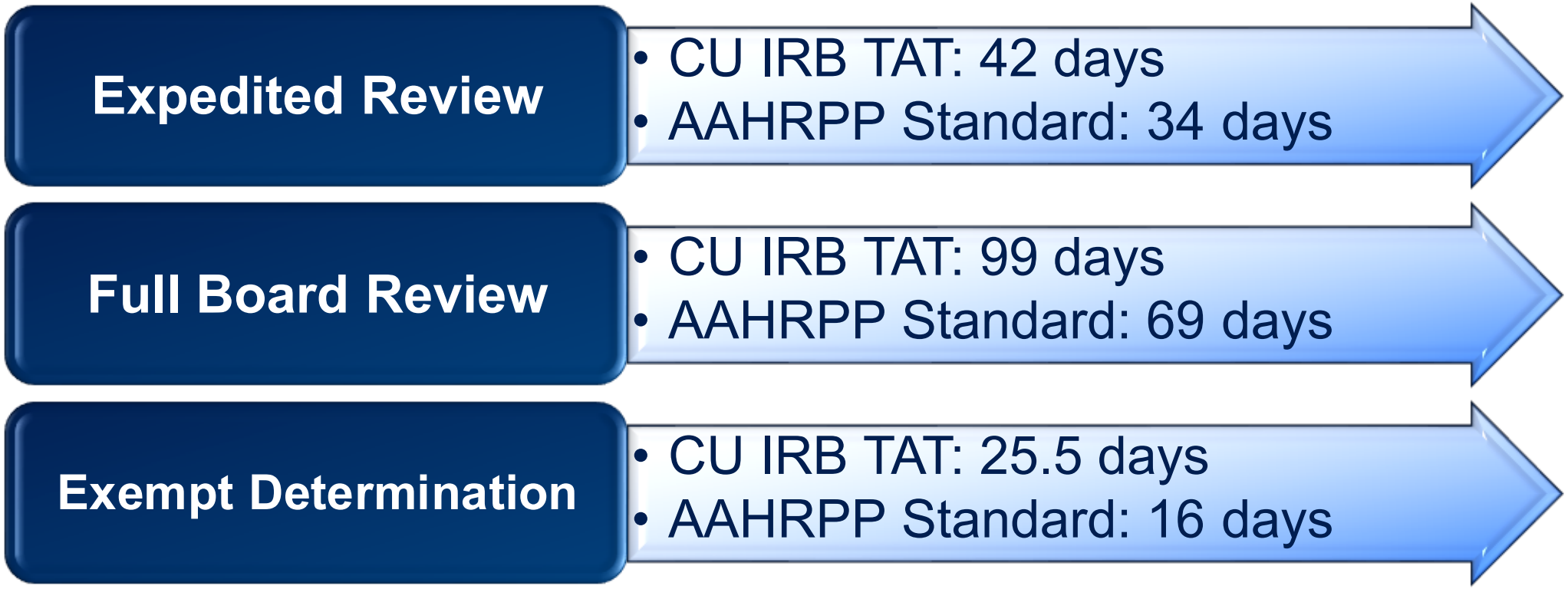
Suggestions for future CU IRB and Me sessions

Next CU IRB and Me Session:
Open Office Hour
on 26-Aug-26 at 12 PM (Central)

Metrics

Recent Metrics

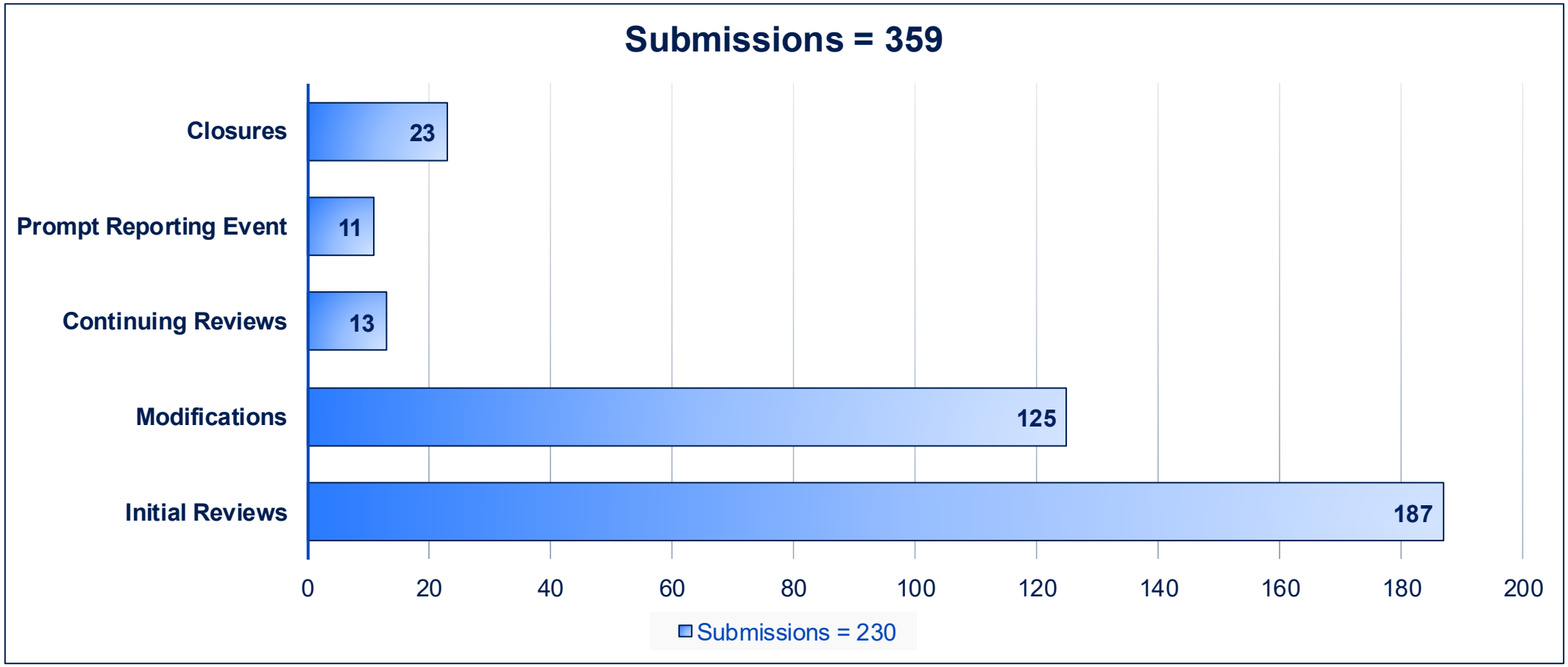
Turnaround time (TAT) data from **submission** to initial approval (January 2026 through May 2026).
Note: TAT includes days with investigators.



AAHRPP = Association for Accreditation of Human Research Protection Programs, Inc.

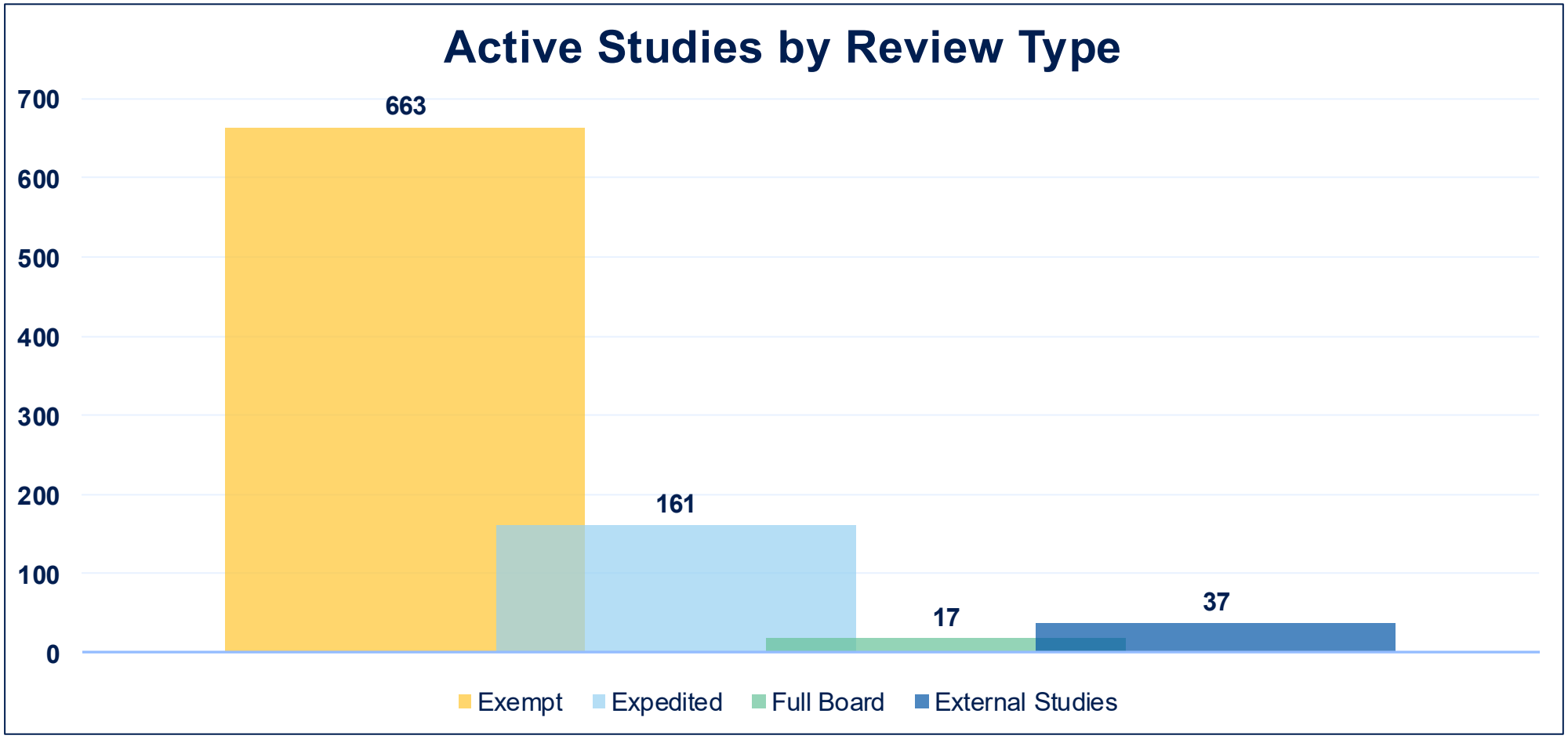
Recent Metrics

Total application submissions – to date January 2026 through May 2026:



Recent Metrics

The CU IRB currently reviews and monitors 878+ active studies.



Q & A

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Thank you.

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