Guidance for IRB and Assessment/Quality Improvement Activities

Chaminade University IRB
September, 2015.

Internal Assessment and Evaluation Research Policy

(This policy is consistent with the guidance provided by the OHRP in their resource “Quality Improvement Activities FAQ” found online at www.hhs.gov/ohrp/policy/qualityfaqs.pdf.)

Research activities conducted solely for academic assessment data purposes, including quality enhancement activities, and intended only for internal dissemination (within Chaminade and potentially with accrediting bodies) are not subject to oversight by the Human Subjects IRB. This includes items such as student opinion surveys (“course evaluations”); focus groups/interviews/surveys for development of courses, programs, and service; and other assessment research tasks that are focused solely on improving and refining the delivery of curricular and extra-curricular services and are only intended for internal audiences. Plans for the external dissemination of academic assessment data shall necessitate that IRB approval take place.

The IRB suggests that researchers conducting institutional assessment research ask the following question prior to collecting data: “If I/we learn something very interesting or extremely helpful, would I/we wish to disseminate externally to non-CUH audiences?” If the answer is “yes,” then your research study does need to go through the IRB approval process.

This policy applies only to academic assessment research conducted by individuals on the department, school, or college level. Individual faculty researchers and student researchers who wish to conduct research on these sorts of topics but who are not officially doing so at the behest of an academic or administrative unit must go through the IRB for approval.

If data have already been collected and a researcher, academic or administrative unit wishes to re-analyze the data for the purpose of dissemination to external audiences, then the research study proposal does need to go through the IRB approval process and would be treated as secondary data analysis through the procedures for verification of exempt status.

Adapted from University of Lynchburg IRB Guidelines, 2015