Care should be taken to eliminate or reduce the risk that undue influence of faculty or coercion affects student participation in research. The following guidelines are used to assist the IRB in evaluating research involving students. Refer to the full IRB Charter or email the IRB Chair for further guidance.

**A. K-12 Students as Research Subjects**

- Principal investigators must acquire a letter of support to conduct research from the Principal(s) of the school(s) where the research is to be done. Such letters of support MUST be submitted to the IRB for review.
- Research involving minors (under 18 years of age) as subjects requires a signed parental permission in most instances as well as assent from the student (age 6-12 verbal, age 13-17 written). Some types of research may qualify for Waiver of Parental permission. If a parental permission form is sent home with a potential student subject, an investigator contact telephone number should be provided on the form to enable parents to ask any questions that they may have for the investigator.
- Parental permission and assent procedures should be clear as to the activities that are part of the research.
- FERPA is a federal law that protects the privacy of personally identifiable information contained within a student’s educational record. FERPA applies to all (K-12 including postsecondary institutions) that receive funds under various programs from the U.S. Department of Education. Generally investigators may not access classroom performance evaluation, grades, or information in a student’s records without prior written permission from a parent or authorized legal representative, regardless of the access an investigator may have in his/her academic role.
- An investigator may not invite participation of potential subjects by a letter that requires the subject to send back a postcard (or telephone) only if he or she does not wish to participate. Subjects may become unwitting participants if, for example, they never receive the letter, don’t read English, or are simply confused by the instructions.
- When research activities to be done by the students are not part of the required class activities, the investigator should arrange to have the data collected by an independent third party, so that the investigator does not know who participated and does not have access to the identifiable data or identity of participants for any purpose until grades have been assigned and entered.
- When course credit or extra credit is given to students who participate in research as part of a course requirement, students are to be given other
options for fulfilling the research component, for example; short papers, special projects, book reports, and brief quizzes on additional readings, research seminars, or completing a similar project. These projects should be comparable in terms of time, effort and educational benefit to participation as a research subject to ensure that students are not being coerced into becoming subjects. Alternatives offered to subjects need prior IRB approval.

- Solicitation of volunteer student subjects for research must be done in a non-coercive manner. To avoid undue influence, subjects should be recruited by a general announcement, central posting or announcement mechanism and should include a clearly written description of the project and a statement of the proposed student participation.
- Whenever possible, researchers should avoid data collection during regular class meetings.
- Students must be allowed to withdraw from the study at any time. The informed consent statement should make clear the consequences of withdrawing from a project prior to completion. In general it is favorable to give credit if the subject withdraws, unless the student withdraws immediately or there is evidence of bad faith on the part of the student.
- If the research is one where data are collected from a group project or perhaps a videotape of the group interaction, each student’s consent is necessary for the use of the data in the instructor’s research. If one student does not consent, the data may be used only if the non-consenting student’s data can be effectively excluded.
- Students have the right to full disclosure as soon as possible. Whenever possible a teaching opportunity in the form of an “educational debriefing” should be employed. Students should know something about the rationale for the study, the process of data collection, and intent of the researcher.

B. University Students as Research Subjects
- Students should be of the age of majority in Hawaii (18 years old). Research involving minors (under 18 years of age) as subjects, (even 17 year old college students) in most instances requires a signed parental consent, as well as that of the student. Some types of research may qualify for a Waiver of Parental permission.
- Generally researchers may not access classroom performance evaluations, grades, and information in a student’s records without prior written permission from the student, regardless of the access an investigator may have in his/her academic role.
- When course credit or extra credit is given to students who participate in research as part of a course requirement, students are to be given other options for fulfilling the research component, for example; short papers, special projects, book reports, and brief quizzes on additional readings, research seminars, or completing a similar project. These projects should be comparable in terms of time, effort and educational benefit to
participation as a research subject to ensure that students are not being coerced into becoming subjects. Alternatives offered to subjects need prior IRB approval.

- Solicitation of volunteer student subjects for research must be done in a non-coercive manner. To avoid undue influence, subjects should be recruited by a general announcement, central posting or announcement mechanism and should include a clearly written description of the project and a statement of the proposed student participation.

- Whenever possible, researchers should avoid data collection during regular class meetings. When study participation consumes a significant portion of a class section, loss of instructional time for both participants and non-participants may be considered a loss of benefits. Also when research participation is expected during the same session at which participation is invited students may be unduly influenced to take part due to peer pressure, perceived stigmatization from nonparticipation, or a sense of having otherwise wasted time by attending the day’s class.

- Students must be allowed to withdraw from the study at any time. The informed consent statement should make clear the consequences of withdrawing from a project prior to completion. In general it is favorable to give credit if the subject withdraws, unless the student withdraws immediately or there is evidence of bad faith on the part of the student.

- If the research is one where data are collected from a group project or perhaps a videotape of the group interaction, each student’s consent is necessary for the use of the data in the instructor’s research. If one student does not consent, the data may be used only if the non-consenting student’s data can be effectively excluded.

- Students have the right to full disclosure as soon as possible. Whenever possible a teaching opportunity in the form of an “educational debriefing” should be employed. Students should know something about the rationale for the study, the process of data collection, and intent of the researcher. In exceptional circumstances, the full or true purpose of the research may not be revealed to the subjects until the completion of data collection. In such cases, students must not be subjected to undue stress or embarrassment and must have the right to full disclosure of the purpose of the study as soon as possible after the data have been collected. During the debrief students should be given an opportunity to decide whether the researcher(s) can use the data collected.

- Research conducted by graduate students in a class in which the researcher teaches, assists in the class or does any grading should be subject to the same restraints describe above.
Adapted from University of Notre Dame IRB Guidelines, 2015