



Policy Number: 98.102

Participation of Students and Employees in Research

Adopted: 09/2007

Revised:

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Human Research Protection Policy

SUBJECT: Participation of Students and Employees in Research

An Investigator's use of employees, students, or other subordinates as research participants presents the possibility for coercion or undue influence. The regulatory requirements for IRB review and approval provide that when some or all of the subjects are likely to be vulnerable to coercion or undue influence, additional safeguards are needed to protect the rights and welfare of these subjects. (See 45 CFR 46.111(b)). This policy addresses the safeguards that investigators must consider and that the IRB will examine in a submitted research protocol to minimize the possibility of coercion or undue influence for these participants.

Coercion occurs when a person is compelled to involuntarily behave in a certain way by use of overt or implicit threat of harm, intimidation, or other form of pressure or force. Coercion also occurs when potential subjects perceive pressure or force to participate. For example, an investigator might tell a potential subject that failure to participate will result in the loss of salary or other benefits, or a lowered course grade; or these potential harms may be perceived.

Undue Influence occurs when a person takes advantage of a position of power by offering excessive or inappropriate rewards for compliance, or, whether intended or not, the person in the position of power undermines the potential subject's freedom of choice. For example, an investigator might tell a potential subject that the decision to participate will result in a job promotion or better course grade; or the person may perceive s/he lacks the freedom of choice.

Student Participation

Investigators must be mindful of the potential for coercion or undue influence when directly recruiting their own students as research subjects. In these situations, the IRB will review the following factors:

1. Student participation in research must be voluntary. Students must not be penalized for refusal to participate in research.
2. A student's voluntary decision whether or not to participate will not influence class standing, grades, or any other benefit under the control of the researcher.
3. Reasonable levels of extra credit or rewards may be offered for participation, however, students must be provided with and informed of non-research alternatives to obtain equivalent credit or rewards.
4. If participation in research is a course requirement, students must be informed of non-research participation alternatives.
5. Someone other than the investigator shall obtain informed consent and collect the data when the investigator is the student's instructor. If this is not feasible, there must be a method of obtaining consent and collecting data that does not divulge to the investigator whether or not the student agreed to participate until after final grades have been assigned for the course.
6. A "student subject pool" is a recognized approach for identifying students who are generally willing to participate in research. Students must consent to participate in each individual research study, and must be free to decline participation in any available



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projects without penalty. Reasonable incentives may be offered for participation (extra credit or other rewards).

Employee Participation

For research where the investigator's employees or other subordinates are being recruited, the IRB will review the following factors:

1. Employee participation in research must be voluntary. An employee shall not be required to participate in research as a condition of employment.
2. An employee's voluntary decision whether or not to participate will not affect their employment, performance evaluation, or any other employment practice.
3. Recruitment is conducted through the use of flyers, advertisements, postings, and/or announcements targeted to a larger audience than just to the employees.
4. If employees are specifically targeted, the investigator has provided a rationale other than convenience for selecting this group.
5. Data are collected and stored in a way that protects the privacy of the employee.
6. Someone other than the investigator shall obtain informed consent and collect the data when the investigator is the employee's supervisor. If this is not feasible, there must be a method of obtaining consent and collecting data that minimizes the possibility of coercion or undue influence.