



Application Instructions: Student Populations

General Guidance:

Please consult the sections below for any information that will be applicable for your research.

K-12 Classrooms: All research conducted in or with K-12 schools/districts, including research interactions with school faculty, staff, or students, requires approval from the district or school prior to initiating research activity. Whether clearance can be obtained at the school level rather than the district level will depend on the district in question. We recommend consulting with the school district.

The IRB will require this documentation of clearance/permission in order to approve this portion of your research activity. This documentation is typically given in the form of a clearance letter. This letter must be signed by the administrator in charge of making decisions at the school site or capable of giving approval for the school. Email approval is possible as long as the email is sent from an institutional email address. The clearance letter should include: (1) The protocol title, (2) A brief description of the research activities that are approved to be conducted at the site, AND (2) the person or entity providing permission including their title, contact information, and confirmation that they have appropriate authority to provide permission for the school or school district.

Please note that FERPA and PPRA may apply to your research.

Minors in University Classrooms: Not all university students are 18 years old, so regulations around minors in research need to be considered.

For non-federally funded research where FERPA considerations do not apply, Western has determined that WWU enrolled students under 18 years old are “mature minors” who are capable of consenting to research without parental permission.

For all other studies, parental permission must be obtained in addition to assent from the minor.

Dual Role & Consent Protections: If you are an instructor or professor conducting research in your own classroom, and participant identifiers are connected to the data, the IRB will prefer that you choose a method of consent where the researcher does not know who participated until after grades have been submitted at the end of the course. This is to prevent even the possibility of students feeling coerced to participate. This can be accomplished in a few ways. Some of these include: (1) Someone other than the instructor can obtain consent and store that documentation until after grades have been submitted or (2) participants can be asked to place written consent forms into an envelope that will be sealed and stored by another party until grades have been submitted. We also recommend informing your students that these practices are in place to avoid the possibility of coercion.

Student Records: [FERPA](#) is a federal law that protects the privacy of student education records. Western has extended the protections of FERPA to include personally identifiable information such as student names, ID numbers, and contact information.

Student education records may not be released without explicit written consent of the student, or with parental permission if the student is under 18 years old, except by [provisions outlined in FERPA](#). Faculty and staff, when acting as

an “institutional official” (performing their duties as an employee), can use student education records for “legitimate educational use.” For example, teachers can email their students about class activities.

Any access or use of an education record for research, however, requires consent. When obtaining consent to release education records, the consent form must include [the following information](#). Exempt applications with FERPA considerations should be especially aware of these requirements.

Some researchers are interested in pulling lists of student names and contact information for recruitment purposes. They may want to use Canvas, a WWU program email roster, or records from the Registrar’s Office. Research recruitment, however, is not explicitly listed in FERPA as a “legitimate educational use.” That unfortunately means this is a grey area for compliance.

Teachers should consider the following points if they plan to disseminate research recruitment notices for their own or another person’s research using education record based email addresses:

- FERPA is not the jurisdiction of the IRB. While the IRB will give as much counsel and direction as possible, IRB approval of a research application does NOT relate to your responsibilities to FERPA.
- The Registrar’s Office is available for counsel, as a second set of eyes. As the authority who investigates FERPA complaints, they are an excellent resource to check with before embarking on a FERPA grey area. The Registrar’s Office, however, does not have authority to “approve” or “deny” uses of educational records such as using course email addresses.
- Go at your own risk. If a teacher uses education record based email addresses for research recruitment, then if there is a complaint, it will fall on that teacher to justify the use.

Registrar’s Office Requests: If you are intending to request education record information for research (see above), you must submit a written request (email or mail) to the Registrar’s Office. Requests are reviewed on a case by case basis to determine if the disclosure is justifiable. The Registrar’s Office approval is not guaranteed, so we recommend consulting with them as soon as possible. Documentation of clearance (email or mail) from the Registrar’s Office should be attached to the submitted Human Subjects Research Application.

Course Credit: A typical amount of course credit for participation is .5 credits for 30 minutes.

If all students receive course credit for an assignment and you only use the data of those who consented to participate in the research, this is not considered providing an incentive, because everyone receives it. In this case, the consent form should specify that there is no incentive for participating.

Extra Credit: When extra credit is provided as an incentive, there needs to be a comparable non-research alternative worth an equal amount of credit.

Researchers may want to recruit across multiple classrooms, where instructors may or may not be willing to give extra credit. In this scenario, it is okay to tell the IRB what range of extra credit will be offered.

European Union Data: If your research involves obtaining personal data from the European Union, there are very strict international requirements on the protection of this data that go above our required protections. Please speak to a

Research Compliance Officer before submitting your application, so that we can work together to ensure that the right protections are in place.

Mandatory Reporting: Most Western faculty and staff are mandatory reporters, which means that if you learn about child abuse or elder abuse, and the participant is identifiable, you must report it to the appropriate authority. If this is the case, be sure to let your subjects know about this limit to their confidentiality.

U.S. Department of Education Funded Research: The Protection of Pupil Rights Amendment (PPRA) is a federal law that affords certain rights to parents of minor students with regard to surveys that ask questions of a personal nature. Parental consent must be obtained before a minor student is requested to answer questions about:

- Political affiliations;
- Mental and psychological problems potentially embarrassing to the student and his/her family;
- Sex behavior and attitudes;
- Illegal, anti-social, self-incriminating and demeaning behavior;
- Critical appraisals of other individuals with whom respondents have close family relationships;
- Legally recognized privileged or analogous relationships, such as those of lawyers, physicians, and ministers;
- Religious practices, affiliations, or beliefs of the student or student's parent*; or
- Income (other than that required by law to determine eligibility for participation in a program or for receiving financial assistance under such program.)

Application Form Instructions

This is guidance for how to complete the original Human Subjects Application form when your research involves collection or analysis of secondary data.

Question 2.5 Research Location: You can list something as general as “Western Washington University” or specify “Western Washington University Classrooms”. You can be as specific as listing classrooms, if that is a key part of the research purpose. Sticking to a generic location will give you more flexibility in your application though, which prevents modifications later on down the line.

Question 4.2. Adults or Minors: If your subjects are only WWU enrolled students, your research is not federally funded AND does not involve FERPA considerations, you can select “18+” and check that “Population” will be the method used to screen for minors.

If some of your subjects are not WWU enrolled students, your research is federally funded OR there is any involvement of student education records, we cannot apply this “mature minors” procedure. You must include a method for screening out participants under 18 years old, or follow the procedures for recruiting minors in research.

4.3. Inclusion/exclusion criteria: Specify here that you are recruiting students. The point of this question is to figure out what makes someone eligible or ineligible to participate, we do not require researchers to forecast demographic information about their subject population.

5.1. Recruitment Methods: If you are intending to recruit subjects via contact information taken from their education record, please refer to the applicable Education Record and Registrar's Office section above. Special permission from the Registrar's Office is required.

If the student contact information is collected separately from the education record, this does not require special clearance. For example, a researcher could pass around a sign-up sheet where student can choose to disclose their name and email address for other purposes like research. Another common recruitment method includes class announcements.

5.2. Screening: If the study is federally funded and/or FERPA protections apply, then a screening procedure is required to exclude subjects under 18 unless you have included a statement about age requirements in the consent form.

DO NOT SUBMIT THESE INSTRUCTIONS PAGES