

## COMPLYING WITH INSTITUTIONAL REVIEW BOARDS (IRB)

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COACHE has completed its own IRB review through Harvard University's Committee on the Use of Human Subjects (CUHS). For the majority of COACHE member institutions, a copy of the Harvard approval letter is adequate documentation of this project's bona fides. However, some institutions demand more to approve this survey research on their campuses.

First, speak with someone in your local IRB office. If the CUHS letter is insufficient, consider these steps:

- On some campuses, the Institutional Research office enjoys blanket approval for these types of studies. If this is the case for your campus IR office, and if they are willing to sign on as partners in this survey, you may be able to use their blanket approval for your COACHE study.
- If this does not work, you can apply for Exempt Status. To qualify for an exemption from full review, you must complete the necessary application with your campus IRB office. Also, you will likely have to refuse receipt of identifiable data, such as would be provided in a unit-record data file. Your application for Exempt Status must be reviewed by an IRB committee member.
- If your study does not qualify for exemption, you can apply for an Expedited Review. Typically, Expedited Reviews require the attention of a single committee member, but the application process is more extensive and requires greater detail, including copies of all communications with faculty and copies of the disclosure pages. All of this information is included in the appendices of this toolkit:
  - The Harvard University CUHS Study Approval
  - All email communication between COACHE and survey participants
  - Survey consent form/disclosure statements
- If none of these steps results in approval, the final option is a full committee review. The application process is very similar to that of an expedited review, but your application will be considered by the full committee. *Even though the applications for expedited and full review are very similar, the processing time for a full review is substantially longer.*

With these steps in mind, you will benefit from developing an early and positive relationship with a member of your IRB office! **Any campus with a pending IRB application cannot begin survey administration with the full cohort.** Delayed starts typically result in lower response rates, and COACHE may assess additional fees for processing time. If it is necessary, COACHE is willing to work with your campus IRB committee to assist in the approval process.

All formal communication with faculty about survey participation must be approved by the IRB. Contact outside of approved IRB protocol may violate the protections promised to human subjects. Any concerns about possible IRB violations should be brought to the attention of COACHE staff immediately.

Participation in the survey is completely voluntary, and no one will know who has or has not responded. Any coercion or pressure of faculty to participate in the COACHE survey is strictly prohibited by IRB protocol, is inconsistent with the mission of COACHE, and undermines the validity of your data. Please remember when communicating with faculty that even subtle comments may be interpreted more strongly than intended (especially when delivered from someone in a position of authority). Err on the side of caution when encouraging your faculty to participate. COACHE staff are available to assist you if any questions remain.