This policy stems from a memo dated December 6, 2004 to all University of Michigan faculty from the Provosts and the Vice President for Research. The purpose of this policy is to:

Student Class Assignment Definition

For the purposes of this policy *student class assignments* include activities that are:

- Conducted during, or outside of class, with students enrolled in an official course (for credit or not for credit)
- Conducted in fulfillment of class assignments involving interactions with individuals other than the members of the class
- Typically initiated and completed within a single term
- Designed to teach research methods through student interaction with individuals or data about individuals, or designed to help students understand concepts covered by the course
- Generally not intended to create new knowledge or to lead to scholarly publication

Student class assignments, as a general rule, are not systematic data collection efforts intended to develop or contribute to generalizable knowledge and, thus, do not meet the <u>federal regulatory definition of research</u>. Therefore, as a rule, student class assignments do not fall under the jurisdiction of the IRB and do not require IRB application, approval, or oversight.

Most student class assignments pose little or no risk to students or others. However, instructors should take special care to to ensure that students realize the potential for harm and take all possible steps to eliminate the risks to students or individuals outside the class involved in the assignment. These

risks may include: physical harm, or potential psychological, social, economic, or legal harm, especially when data is collected about sexual activity, use of alcohol or illegal drugs, or involvement in illegal activities. Such risks can be exacerbated when the individuals outside the classroom are minors, pregnant women, prisoners, or people who are otherwise vulnerable, such as cognitively impaired persons.

University Policy

Student class assignments that **are** intended to collect information systematically with the intent to develop or contribute to generalizable knowledge (e.g., publish or disseminate data) **meet** the federal regulatory definition of "research." These class assignments fall under the jurisdiction of the IRB and require IRB application, approval and oversight. Instructors wishing to use such assignments must apply to the appropriate IRB for review and approval of these assignments before they begin.

Class assignments may become subject to this policy (and be considered regulated research) if the faculty member or the students change their plans to use the data during the data collection or after the data have been collected. If the faculty member or students wish to use data collected from class assignments for research and publication, application to the IRB for permission to use the data is required.

Independent research projects (e.g., theses, honor projects, independent studies) conducted by students that collect data through interactions with living people or access to private information fall under the jurisdiction of the IRB. Application to the IRB for these student research projects must include an endorsement and acceptance of overall responsibility by a faculty member.