

## Humanities Projects and IRB Review

### A Guide for Students and Faculty at the University of Chicago

This brief guide provides a response to questions that have come up over the last few years concerning projects in the Humanities—in particular the question of whether or not a project is subject to review by the University’s Institutional Review Board (IRB). Scholars who have some doubt about whether their proposed study must be approved by the IRB should read this guide; *if they have lingering doubts they should contact the IRB office for further discussion.*

The confusion within the Humanities arises not least because some faculty members and students quite reasonably do not know what the IRB Board is, what it does, or how it functions. The **Institutional Review Board** exists to ensure that, during the course of a research project, the personal welfare and the rights of human subjects are protected. In the wake of serious violations of human rights in the name of research (such as the Tuskegee syphilis study), the federal government created the IRB system in the 1970s. Universities around the country typically have their own institutional IRBs that operate under the federal IRB regulations. For faculty and students working in the humanistic fields, the University’s Social and Behavioral Sciences Institutional Review Board (SBS IRB) is the relevant governing entity; the Board reviews the research protocols to assure that the research procedures meet all the federal requirements for protecting research subjects, and to help the researcher establish procedures to minimize the participants’ exposure to physical, psychological, economic, or social risks. The researcher submits a research protocol and related documents (such as recruitment materials and consent forms) in the online submission form system called AURA, responding to detailed questions in the submission form (that asks about recruitment, consent or parental consent, data protection strategies, etc.). This is a time-consuming process, but a crucial process (mandated by the federal government). The importance of such review becomes clear and cogent when you imagine, for instance, a sociologist who wants to study the attitudes of prison guards in the State of Indiana. How do you ensure the anonymity of the responses you’re collecting, and how do you insure that the data you collect and store does not put an individual at risk from either authorities or peers? The IRB carefully reviews the proposed protocols and approves them, or asks for revisions as needed to ensure that risks to research participants are minimized. (Note too that when a student is conducting the research, a faculty advisor must sign off on the project – under University policy, students cannot be the Principal Investigator on a research study that goes through IRB review; only faculty and individuals with certain other titles can serve as the Principal Investigator. For more information on who can be the Principal Investigator, see the PI eligibility policy at <http://ura.uchicago.edu/page/principal-investigator-eligibility>)

When it comes to work within humanistic fields of inquiry (including History, for instance), considerable confusion arises from the IRB regulations’ specific definitions of *research* and *human subjects*. **Research** is defined as “a systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable

knowledge.” A *Human Subject* is defined as “a living individual about whom an investigator obtains (1) data through intervention or interaction with an individual or (2) obtains identifiable information.” *A proposed project requires SBS IRB review only when the project both involves human subjects and constitutes research.* Simply put, then, much of the “research” conducted by scholars in the Humanities simply does not count as *research* under the definition in the IRB regulations and thus is not subject to review by the Board. Nonetheless, there are projects—particularly in a field like Linguistics—that are subject to IRB review. Ethnographic research typically requires IRB approval, as does much Internet survey research. The federally established definitions are not ideal (“generalizable knowledge” seems particularly elusive, for instance), but they are the determinants.

Needless to say, for a scholar working on Han dynasty China or Tudor England there is no ambiguity. Ambiguity arises when scholars in the Humanities are conducting interviews—writing a history of the University of Chicago, for instance, or writing about contemporary Portuguese literature. Oral history has been a particularly thorny area in which to figure out which projects need IRB review. Interviews that serve only to document an individual's life history, specific historical events, or the experiences of individuals or communities over different time periods to develop general reflections on past events are not considered human subjects research that requires IRB review, as they are not designed to lead to the development of a hypothesis in a manner that has predictive value. The collection of this type of information is generally considered to be a biography, a documentary, or a historical record of the individual's life or experience, or of historical events. Thus, many oral history projects do not need IRB review. However, if the interviews occur as part of an effort to develop or test a hypothesis in a way that would have predictive value, then those interviews would be considered human subjects research that should undergo IRB review. Columbia University's IRB has developed a policy on IRB review of oral history that does a very good job of explaining these issues and gives some helpful examples – the University of Chicago SBS IRB agrees with the approach reflected in the Columbia University IRB policy on oral history. The Columbia University policy on IRB review of oral history is available online at

<http://www.columbia.edu/cu/irb/policies/documents/OralHistoryPolicy.FINAL.012308.pdf>.

To work through an example, should you be collecting responses to a performance at a theater in New York, your methodology and your objective would determine whether or not the project is subject to IRB review. Should the project be conducted to gather information about the performance without aiming to contribute to generalizable knowledge, it would not be considered research that needs IRB review; should it be conducted to reach generalizable conclusions about how people react to such an event, it would be considered research that needs IRB review. This can be a somewhat fuzzy line to draw, and if you are in doubt about whether your project needs IRB review, the best first step is to contact the IRB office for further

discussion – if the IRB indicates that your project does not need IRB review, then you will have saved yourself time by not filling out the IRB submission form.

If your project does need to go through IRB review, it may qualify for an exemption. For example, much survey and interview research, and observation of public behavior, can qualify for an exemption even if the data is identifiable, so long as any disclosure of the participants' responses outside the research (e.g., a data breach situation) would not reasonably place the participants at risk of liability or be damaging to participants' financial standing, employability, or reputation. Thus, much non-sensitive interview and survey research qualifies for an exemption. You must submit an application to the IRB to request an exemption. Because exempt research is still human subjects research, the IRB will want to see what type of consent form or consent script will be used with participants even for exempt research.

It is important that scholars in the Humanities recognize the existence and importance of the SBS IRB, but also important that humanistic scholarship not be impeded by unwarranted anxieties. The Institutional Review Board supports the scholarly community by helping individuals to determine whether their work requires review, and by helping scholars to sustain ethical responsibility as they conduct their work. ***Should you have questions, you can contact the IRB office.*** This brief informational guide should be shared with students and faculty in the Humanities, but the IRB website provides much more detailed information: <https://sbsirb.uchicago.edu>. There you will also find the email addresses and telephone numbers for a staff that is knowledgeable, supportive, and eager to streamline the process.

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