

Grand Valley State University
Human Research Review Committee (HRRC)

Title: *External researchers seeking data collection and/or recruitment of GVSU students, faculty, and/or staff*

Section: 1130.

Approved by HRRPPC: 04/25/2017

Approved by AIO: 04/25/2017

Related documents:

110: Ethical and legal standards & practices for HS research

120: Compliance with applicable laws and regulations

310: Researcher responsibilities, qualifications and training

321: Researcher conflict of interest when enrolling GVSU students and employees

330: Authorization to conduct research

750: Recruitment, selection and payments to research participants

1110: Collaborating researchers not covered by an FWA

1120: Collaborating researchers covered by an external FWA

Policy

It is GVSU policy to have all requests from *unaffiliated researchers* seeking data collection and/or recruitment of GVSU students, faculty, and/or staff formally reviewed to ensure and protect the safety of our university participants and to determine if, according to applicable federal and university policies, GVSU is engaged in the research activity.

Definitions

1. An *unaffiliated researcher* is as an investigator who is not otherwise an employee, student, or agent of GVSU.
2. The term *engagement* applies to GVSU as an institution, not to individual research, and is relevant for non-exempt human subjects research studies.
3. *Coded data* is a subset of de-identified data in which a link exists to re-identify individual information, but when an agreement is made to prevent disclosure by the source to the researcher.

Procedures

1. Unaffiliated researchers who wish to collect data about GVSU faculty, staff, and/or students, and/or recruit GVSU participants, must request permission through the Office of Research Compliance and Integrity (<http://www.gvsu.edu/rci/>) before such data will be released and before beginning recruitment of faculty, staff, and/or students (via email announcement, poster, flyer, newspaper ad, or any other method of recruitment).
2. Unaffiliated researchers must provide the Office of Research Compliance and Integrity written documentation of the study details. This includes, but may not be limited to, the purpose of the

study, a description of GVSU's involvement in the study, anticipated project dates, recruitment methodology, and a description of data collection and handling methodology. Additionally, the unaffiliated researcher must provide a copy of the determination (for activities that qualify as exempt) or approval (for activities requiring expedited or full-IRB review) letter from the home institution.

3. GVSU's Human Research Review Committee (HRRC) Chair, or their designee(s), will review the request to assess the safety of GVSU faculty, staff, and students involved in the study and to determine if GVSU is engaged in the research.
 - a. If it is determined that GVSU is engaged in the research:
 - i. The unaffiliated researcher must identify a GVSU faculty or staff member willing to serve as a Co-Investigator for the duration of the research project.
 - ii. The GVSU faculty or staff member will be responsible for obtaining proper HRRC approval prior to any work on the project being conducted at GVSU. The GVSU researcher will be required to abide by all researcher responsibilities, qualifications, and training, as outlined in Policy 310.
 - b. The HRRC reserves the right to have requests for permission to recruit on campus go to the full board for review and approval, should the HRRC Chair decide that the nature of the study requires the independent scrutiny of the HRRC to protect its faculty, staff, and students.
 - c. If the unaffiliated researcher's request is approved, a letter of permission to release data and/or recruit on campus will be provided to the unaffiliated researcher.
 - d. If the unaffiliated researcher's request is denied, the data will not be released to the unaffiliated researcher, nor shall the researcher recruit any GVSU faculty, staff, or students.
4. The Office of Research Compliance and Integrity considers the protection of human subjects involved in the study and the engagement of the university in the research; it does not explicitly grant authority for the researcher to conduct the research at GVSU. Therefore, unaffiliated researchers must also obtain approval to conduct the research on GVSU's campus from the Authorizing Institutional Official (AIO).
5. Determination of GVSU engagement in human subjects research
 - a. GVSU is engaged in research when faculty, staff, or students:
 - i. Obtain data from a research participant through interaction (including observation and manipulation of environment) or intervention
 - ii. Obtain personally identifiable information or materials of research participants
 - iii. Obtain informed consent from participants for research
 - iv. Serve as Principal Investigator or Co-Investigator (including multi-site studies)
 - v. Receive an award through a grant, contract, or cooperative agreement directly from Health and Human Services (HHS) for the non-exempt human subjects research (i.e., awardee institutions), even where all activities involving human subjects are carried out by employees or agents of another institution.
 - b. The following activities, in and of themselves, do not constitute engagement:
 - i. Serving as key personnel to analyze de-identified or coded data
 - ii. Informing potential subjects about research by providing information (e.g., survey link or information sheet, researcher's contact information, etc.) but not obtaining

consent

- iii. Allowing the use of facilities for interactions/interventions to be carried out
- iv. Releasing private identifiable information to researchers at another institution (e.g., school or health records)