Minutes of the Institutional Review Board November 17, 2010

Members present: Lisa Ferrari, Mary Rose Lamb, Julia Looper, Alexa Tullis

Guest: Juli McGruder

Lamb called the meeting to order at 8:11 a.m.

The Board approved the minutes from November 3, 2010.

Lamb noted that McGruder had asked to attend the meeting to discuss student research overseas, specifically in the developing world. Speaking as an anthropologist who lives much of the year in Zanzibar, Tanzania, McGruder noted the increasing number of students and scholars, including a notable number of Puget Sound students, who come to Zanzibar to conduct research but who lack the required government clearance to do so. McGruder is also concerned about the levels of cultural, linguistic, social, and political ignorance displayed by these students and scholars. She would like the university to encourage students to regard their work abroad as "field studies" rather than "research," and to set goals for inquiry that will be less intrusive and more respectful to human subjects, given the cultural context.

Tullis asked for clarification of the difference between "research" and "field study." McGruder replied that field study would involve informal interaction with people to learn about non-sensitive, non-controversial aspects of their experiences. Research, on the other hand, would involve more formal interaction (e.g., via interviews) and could deal with more sensitive topics.

McGruder noted that in many developing countries the whole population, including government representatives can be understood as "vulnerable" by American standards. She offered the example of a Puget Sound student who interviewed a government employee about the adequacy of funding levels for that person's agency. Critical remarks by such an employee could have detrimental effects if they found their way back to the government in question via a conference paper, Arches article, or other vehicle.

Looper suggested that, because of this situation, all researchers should demonstrate in-country approval before obtaining university permission to conduct research overseas. McGruder agreed, but observed that requests for such approval are often fruitful only when they are made in person. Therefore, researchers should assume that the first few months of their time overseas will be given over to securing in-country permission to begin collecting data.

Ferrari asked whether the distinction between "field study" and "research" would mean that many student projects would then fall out of IRB oversight. Lamb noted that while federal regulations may require IRB approval for projects meeting the federal legal definition of "research," the university is free to make more conservative rules about what sorts of projects require IRB approval.

Lamb reported that another member of the IRB had, in past discussions, argued that students must make mistakes to learn and so the IRB should allow that. Tullis expressed concern that the university act to protect vulnerable populations, and said she had been persuaded by McGruder's presentation that a very wide range of people in the developing world could rightly be considered vulnerable. Tullis also said that the process of negotiating research access overseas would, in itself, be a valuable educational experience for students. Ferrari asked whether federal law defines "vulnerable population." Board members were unsure.

Looper asked whether, by not requiring students to obtain appropriate in-country authorization for research projects, we are either violating federal law or creating new liability for the university. She pointed out that the university is liable for all research done under its auspices. She drew McGruder's attention to a draft statement, which has not yet been vetted by the IRB, that she has prepared regarding overseas research. According to the statement, Puget Sound students would need some form of in-country approval before receiving IRB approval for their projects. McGruder offered to contact the School for International Training (SIT), a study abroad provider that has a program in Zanzibar on which Puget Sound sends students. SIT programs have a significant field research component. McGruder will ask the SIT director how that program negotiates government requirements.

Ferrari reminded the Board of McGruder's earlier statement that such permission could take months to achieve, or might only be received by in-person petition. Such a delay in the process is unlikely to mesh well with the UEC grant cycle for student research. Looper pointed out that such a conflict is a matter for the UEC's attention. Tullis agreed, and argued that IRB protections for human subjects should be given priority over preserving a particular funding process. McGruder observed that few Puget Sound departments send students overseas for research. Perhaps a message to those department heads would be helpful. Likewise, the IRB could form a subcommittee to consider how to bring these issues to faculty members' attention.

Tullis reiterated that information on the SIT program's research component would be valuable.

The meeting was adjourned at 8:50 a.m.

Respectfully submitted, Lisa Ferrari