

XAVIER UNIVERSITY
INSTITUTIONAL REVIEW BOARD
Application for Approval of Research Involving Human Subjects
GENERAL INSTRUCTIONS

**** Please download this form and then complete using Adobe Acrobat. ****

1. Review the guidelines and definitions for the protection of human subjects in research at [Xavier.edu/irb](http://www.xavier.edu/irb).
2. If you are unsure that your study constitutes "Research" as defined by the Determining Research form, complete the Determining Whether Proposed Activity is Human Research According to DHHS or FDA Regulatory Definitions <http://www.xavier.edu/irb/documents/1DeterminingHumanResearchForm10-9-12.pdf> and send it to the IRB office.
IMPORTANT NOTE: If you are confident that your study constitutes "Research" as defined by the Determining Research form, the form may be submitted as part of, rather than in advance of, the full application. The form is included below.
3. Complete this application submission form by completing all sections and providing your electronic signature at the end.
4. Attach a copy of all Informed Consent forms that will be used.
5. Attach a copy of all research instruments (e.g., questionnaire, survey, semi-structured interview guide).
6. Attach letters of permission of study/recruitment sites as appropriate.
7. Attach completed HIPAA form if you answer "Yes" to Question 1 in Section IV of the application.
8. Attach a copy of CITI training certificates for all project personnel (PI, co-investigators, research assistants, etc.).
NOTE: Because the NIH training has been taken offline, and because that training is out of date based on the changes to the Common Rule, we will only be accepting CITI training.

To complete the CITI training:

- Go to the CITI Course www.citiprogram.org to register for the CITI online training.
- Click Register
- Under "Select your organization Affiliation" type Xavier University.
- Next, proceed to create your own username, password.
- Select Curriculum. Questions one and five are the only questions that you are required to answer.
- Question 1 will ask which learner group. All submitters will need to complete 1 of the 2 following courses
 - a. Undergraduate students doing research solely to satisfy course requirements or
 - b. All investigators and project personnel on IRB submissions (other than undergrad class projects)
- Select the appropriate group.
- Question 5 asks if you would like to take the conflict of interest course. You only need to take this course if it is relevant to your protocol.

Once you have completed the preceding steps you are logged in and Registered for the course. You may begin the appropriate course or log out and return at another time. If you chose to log out, when you return to the CITI homepage you will NOT need to register again. You will login with the username and password you have already created. Upon completion of the course, you will receive a certificate of completion.

General instructions: <https://www.xavier.edu/irb/Training-for-Human-Participant-Researchers.cfm>
CITI training web site: <http://www.citiprogram.org>

9. When all information has been captured, submit the application. (Student submissions go to your Faculty Advisor. All other submissions go directly to the IRB.)

All forms are available at <http://www.xavier.edu/irb>. If you have questions, call the IRB office at (513)745-2870 or email irb@xavier.edu.

**** Please download this form and then complete using Adobe Acrobat. ****



Determining Whether Proposed Activity is Human Research According to DHHS or FDA Regulatory Definitions

Investigators: Please complete the following information below. You will be notified in writing if this has been determined that IRB oversight is not necessary.

Person Requesting Determination and Contact Information	Name & Degree	Department
	Phone	Mail Location or Mailing Address
	Email	
Title of Project		
Description of Project, Including Whether or Not Findings Will be Disseminated outside of Xavier.		

Research for which DHHS regulations or XU Policies may apply

***BOTH** "Research" and "Human participants" categories OR "FDA" (next page) must be true for IRB review to be required.*

☐ The activity involves **RESEARCH** because BOTH of the following are true.

☐ The activity is a systematic investigation, including a systematic collection of data.☐ The activity is designed to develop or contribute to generalizable knowledge.

☐ The activity involves intervention or interaction with **HUMAN PARTICIPANTS** because BOTH of the following are true.

☐ Human participants are involved because EITHER of the following is true.

☐ The data being collected are about living individuals.☐ The data being collected include genetic/biological material (sputum, tissue, swab, blood, body fluids, etc.).

☐ Intervention or interaction is involved because EITHER of the following is true.

☐ The investigator plans to obtain the data through ANY of the following (select all that apply).

☐ Physical procedures performed on or by participants.☐ Manipulation of participants.☐ Manipulation of participants' environment.☐ Communication with participants.☐ Interpersonal contact with participants.

☐ The information collected is BOTH of the following.

☐ Private, because EITHER of the following is true.

☐ The information is about behavior that occurs in a context in which the individual can reasonably expect that no observation or recording is taking place (such as in a home or a private office).☐ The information is provided by the individual for a specific purpose which the individual can reasonably expect will not be made public (such as class assignments or medical records).

☐ Individually identifiable, because EITHER of the following is true.

☐ The identity of the individual is or may readily be ascertained by the investigator.☐ The identity of the individual is or may readily be associated with the information (including a master list linking identity and study ID#).

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Research for which FDA regulations or XU policies may apply.

AT LEAST ONE of the following three categories must be true for IRB review to be required.

☐ The activity involves the use of an investigational **DRUG** because ALL of the following are true

☐ At least ONE of the following is true (select all that apply).

- ☐ The article is recognized in the official United States Pharmacopoeia, official Homeopathic Pharmacopoeia of the United States, or official National Formulary, or any supplement to them.
- ☐ The article is intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease in humans or other animals.
- ☐ The article (other than food) is intended to affect the structure or any function of the body of humans or other animals.
- ☐ The article is intended for use as a component of any article specified in the above items.

☐ EITHER of the following is true.

- ☐ The article is NOT approved by the FDA for marketing.
- ☐ The article is NOT being used in the course of medical practice.

☐ The article or activity will be used on one or more humans.

☐ The activity involves the use of an investigational **MEDICAL DEVICE** because ALL of the following are true.

☐ At least ONE of the following is true (select all that apply).

- ☐ The article is recognized in the official United States Pharmacopoeia, or official National Formulary, or any supplement to them.
- ☐ The article is intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease in humans or other animals.
- ☐ ALL of the following are true.
 - ☐ The article is intended to affect the structure or any function of the body of humans or other animals.
 - ☐ The article does NOT achieve any of its primary intended purposes through chemical action within or on the body of humans or other animals.
 - ☐ The article is NOT dependent upon being metabolized for the achievement of any of its primary intended purposes.

☐ EITHER of the following is true.

- ☐ The article is NOT approved by the FDA for marketing.
- ☐ The article is NOT being used in the course of medical practice.

☐ The article or activity will be used on one or more humans.

☐ The activity is **OTHERWISE** subject to FDA regulation because AT LEAST ONE of the following is true.

☐ Data from the activity will be submitted to or be held for inspection by the FDA.

☐ The activity involves at least ONE of the following FDA regulated articles (select all that apply).

- ☐ Food or dietary supplement that bears a nutrient content or a health claim.
- ☐ Food or color additive for human consumption.
- ☐ Infant formula.
- ☐ Biological product for human use.
- ☐ Electronic product for human use.
- ☐ Other article subject to the Food, Drug & Cosmetic Act.

☐ The activity is being done to determine the safety or effectiveness of the drug or device.

For IRB Office Use Only

Determined to be human research requiring IRB review, submission to the IRB is required. ☐

Determined NOT to be human research requiring IRB review, submission to the IRB is NOT required. ☐

Signature of IRB Chair or Designee

Date

For IRB Office Use Reviewers: _____

Date of Submission: _____ Protocol Number: _____ Review Category: ☐ Exempt ☐ Expedited ☐ Full Board Review

XAVIER UNIVERSITY
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I. (a) General Information

Title of Study: _____

Principal Investigator: Name _____ Department _____

Investigator is: Faculty Staff Undergraduate Student Graduate Student Other _____

Mailing Address of Investigator: _____

Phone: _____ E-mail: _____

Names of Co-Investigators: _____

Name of Faculty Advisor: (if applicable): _____

Phone: _____ E-mail: _____ Campus Mail Location: _____

Intended sponsor/funding agency (if applicable): _____

Protocol submitted to another IRB? Yes No

If so, please provide the following information and attach approval letter (if one has been provided) from the other reviewing IRB(s) at the end of this form.

Name of institution: _____ Date Submitted: _____

Have you completed Human Subjects Training? ☐ Yes Please include certificates of completion for Primary Investigator and co-investigators.

Has your advisor completed Human Subjects Training? ☐ Yes (IRB will confirm that certificate is on file).

I. (b) IRB Protocol Summary Document

Please note that most Exempt and Expedited summaries should be no longer than three (3) single-spaced pages (generally 1200-1800 words). For complicated Expedited protocols, or most Full-Board protocols, longer summaries are often appropriate in order to provide the IRB with all relevant procedural details.

Statement of Research, Purpose and Significance of Study: Should be 2-3 paragraphs in length, provide references/key citations to position your study with respect to existing literature.

Research Methodology and Procedures: Provide **detailed** information regarding the methodology and procedures.

Informed Consent Procedure: Informed consent is a process, not just a form. Please describe how this process will take place. You will attach the informed consent later in the application.

Recruitment Procedure and Script: Provide who will be subjects and why, total number, inclusion/exclusion criteria, source, initial contact method, and a copy of any announcements or instructions relating to subject solicitation. This includes announcements publicly posted or instructions to others who will be asked to contact potential subjects.

Analysis -Brief description of how data will be analyzed (quantitative and/or qualitative).

Storage and Access of Data-Describe who will have access to the data, the location of the stored data, the length of time the data will be stored, and the destruction process. Also include the location and storage information of informed consents. Federal guidelines require they be stored for a minimum of 3 years following the completion of the research, and cannot be stored in the same location as the data.

II. Additional Study-related Information

Check all that apply

- ☐ Subjects less than 18 years old. Indicate which of the following categories most accurately describe this protocol
 - ☐ minimal risk
 - ☐ greater than minimal risk (§46.404)
 - ☐ greater than minimal risk but of direct benefit to individual (§46.405)
 - ☐ greater than minimal risk with no direct benefit to individual, but likely to yield generalizable knowledge (§46.406)
 - ☐ research not otherwise approvable which presents an opportunity to understand, prevent or alleviate a serious problem affecting the health or welfare of minors (§46.407)
- ☐ Disadvantaged subjects (e.g. impaired elderly, disabled, mentally/cognitively impaired, individuals with language barriers)
- ☐ Incarcerated subjects or persons under a correctional sentence (parolees)
- ☐ Subject(s) may experience emotional stress as a result of participation
- ☐ Subject(s) may be identified as possibly needing additional services as a result of participation
- ☐ Subjects will be deceived or incompletely informed regarding an aspect of the study (*debriefing may be necessary – include text if appropriate*)
- ☐ More than minimal risk to subjects (*provide risk/benefit analysis*)
- ☐ Audio or videotaping of subjects (*address additional confidentiality and consent issues if applicable*)

Additional safeguards are necessary for vulnerable populations, in special situations that develop during a study, and in certain research designs. Consideration of these factors may require a higher level of review than may otherwise be necessary. *Explain in your summary the safeguards you will employ for identified vulnerable populations and measures you will incorporate to address identified study related special situations.* Review the expedited and full board review categories with these issues in mind to determine which category seems to be appropriate for the review of your research.

III. (a) Review Level for which you are applying

Exempt Review (complete checklist III (b) if you believe your study qualifies as Exempt)

Expedited Review (read III (d))

Full Committee Review (if your study meets neither exempt nor expedited criteria)

III. (b) If seeking Exemption, complete this section.

The research is being conducted in established or commonly accepted educational settings. Such research involves normal education practices that are not likely to impact students' opportunity to learn required educational content or the assessment of educators who provide instruction. This includes most research on instructional strategies, and research on the effectiveness of instructional techniques, curricula or classroom management methods. **Research is exempt. Go to Section IV.**

The research involves only the use of educational tests, survey procedures, interview procedures or observation of public behavior. If so, then the research may be exempt if any of these conditions apply: **Continue.**

The information obtained cannot be readily linked back to subjects. **Research is exempt. Go to Section IV.**

Any disclosure of the subjects' responses outside the research could not reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing, employability or reputation. **Research is exempt. Go to Section IV.**

The information obtained can be readily linked back to subjects, and the investigators expect a **limited IRB review** of the research for protection of the subjects' privacy and confidentiality. **Research is exempt. Go to Section IV.**

Note that if the subjects are children, the investigators may not participate in the activities be observed to qualify for this exemption.

Research involving benign behavioral interventions with adults who prospectively agree and when information collected is limited to verbal or written responses (including data entry) or audiovisual recording, and:

The information obtained cannot be readily linked back to subjects. **Research is exempt. Go to Section IV.**

Any disclosure of the subjects' responses outside the research could not reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing, employability or reputation. **Research is exempt. Go to Section IV.**

The information obtained can be readily linked back to subjects, and the investigators expect a limited IRB review of the research for protection of the subjects' privacy and confidentiality. **Research is exempt. Go to Section IV.**

Research that is secondary only and uses identifiable private information or identifiable biospecimens for which consent is not required, if: **Continue.**

The information obtained cannot be readily linked back to subjects. **Research is exempt. Go to Section III. (c)**

The information, which may include information about biospecimens, is recorded by the investigators in such a manner that the identity of the human subjects cannot be readily ascertained directly or through identifiers linked to the subjects, the investigator does not contact the subjects or re-identify subjects. **Research is exempt. Go to Section III (c).**

The investigators' use is regulated under HIPAA as "health care operations," "research," or "public health". **Research is exempt. Go to Section III (c).**

The research is conducted by, or on behalf of a federal agency using data generated by the government for non-research purposes, and the information is protected by federal privacy standards. **Research is exempt. Go to Section III (c).**

Research that is supported by a federal agency and is designed to study public benefit or service programs. **Research is exempt. Go to Section IV.**

Research that involves only a taste and food quality evaluation or a food consumer acceptance study. **Research is exempt. Go to Section IV.**

Research that involves only storage or maintenance of identifiable private information or identifiably biospecimens for secondary research and the investigators expect a **limited IRB review** of the research for protection of the subjects' privacy and confidentiality, including procedures related to subjects' Broad consent. **Research is exempt. Go to Section IV.**

Research that is secondary and only uses identifiable private information or identifiable biospecimens, and the investigators expect a limited IRB review of the research for protection of the subjects' privacy and confidentiality, including procedures related to subjects' Broad consent. **Research is exempt. Go to Section IV.**

III. (c) For existing data sets please include the following information in your summary:

- 1) Source of data set; 2) brief description of contents of the data set including whether or not the data set you receive will contain identifiers and if so, how you will protect the confidentiality of subjects; and
- 3) whether the data are from a public or protected data set. If protected, (a) explain how you will obtain access to the information (written documentation of this permission – email or hard copy from person authorized to provide access – will be required as a condition of approval) and (b) advise as to whether or not the respondents gave permission for the information to be used for research purposes and whether broad consent was obtained for future research.

III. (d) If your protocol is not exempt, read this section to determine if, in your estimation, your study should be reviewed by Expedited Review. See 45 CFR 46.110 for unabridged text (<https://www.hhs.gov/ohrp/regulations-and-policy/regulations/45-cfr-46/index.html>).

Studies reviewed in this category must meet all of the following requirements: 1) Risks to subjects are minimized; 2) Risks to subjects are reasonable in relation to anticipated benefits, if any, to subjects and the importance of the knowledge that may be expected to result; 3) Selection of subjects is equitable; 4) Informed consent will be sought to the extent required by §46.116.

IV. Other Considerations:

Yes No

1. Will protected health information (PHI) be obtained from a covered entity without authorization for its use by the patients (a health plan, health care clearinghouse or health care provider)? *If so, please complete and attach the Request for HIPAA Alteration to/Waiver of Individual Authorization form.*

Yes No

2. Are you conducting only anonymous survey research that involves no more than minimal risk to subjects? If so, while informed consent is still necessary, subjects may be able to be consented by reading or listening to an informed consent document/script which includes a statement that completion of the survey indicates consent to participate in the study. *Provide a modified informed consent document/script that does not require a signature.*

Yes No

3. Are you requesting a waiver or alteration of Informed Consent?

An IRB may approve a consent procedure that does not include, or alters, some of the elements of informed consent. *Provide justification for the waiver in the following boxes. Please be sure to provide sufficient detail for the IRB to evaluate the need for the waiver/alteration. If you are not requesting a waiver or alteration of informed consent, please skip the following questions.*

Describe how the proposed research presents no more than minimal risk to subjects.

Why will a waiver of informed consent not adversely affect the rights and welfare of the subjects?

Why is it impractical to carry out the research without a waiver or alteration of informed consent?

How will pertinent information be provided to subjects, if appropriate, at a later date?

V. Conflict of Interest Disclosure

Yes No

Except for grant-funded compensation and expenses, do you, or does any member of your immediate family, intend or expect to profit financially in any manner from the results of the research undertaken in this study (including but not limited to any patent, royalty, or licensing fees)?

If yes, please provide a detailed description of your financial intentions or expectations:

Yes No

Do you, or does any member of your immediate family, currently have or expect to have an ownership or other financial interest in, or management position with, any entity whose procedure, technique, product or software is used or tested in this study?

If yes, please provide a detailed description of your financial interest or management position:

VI. Permission for future IRB use

Yes No

The IRB is interested in compiling a database of sample protocols to use in training new members, and to further educate faculty and students about the IRB review process. Any protocol used for these purposes would be fully anonymized (all identifying information about you and your research team would be removed), and would not be used for a minimum of two (2) years after its completion. Only those studies that are no longer actively collecting data at that time would be made available. In light of this, would you be willing to allow the IRB to use your protocol for training purposes two years after the completion of your project?

Note: Your response to this question has no bearing on the review of your protocol. You may elect not to respond at this time and notify our office at a later date if you would like your anonymized protocol to be included in our training database.

The IRB may include an anonymized version of my protocol in its training database.

I would prefer the IRB not include any version of my protocol in its training database.

I would like the IRB to contact me six months after my protocol is approved to request permission to utilize my protocol in its training database.

***** FACULTY ADVISOR USE ONLY*****
THIS PAGE REQUIRED FOR STUDENT RESEARCH ONLY
(Submit with application)

Faculty Advisor Assurance

By my signature as sponsor on this research application, I certify that the primary investigator is knowledgeable about the regulations and policies governing research with human subjects and has sufficient training and experience to conduct this particular study in accord with the approved protocol. I also agree to monitor the progress of the study.

I further certify that the proposed research is not currently underway and will not begin until approval has been obtained.

Conflict of Interest Disclosure

Yes No

Except for grant-funded compensation and expenses, do you, or does any member of your immediate family, intend or expect to profit financially in any manner from the results of the research undertaken in this study (including but not limited to any patent, royalty, or licensing fees)?

If yes, please provide a detailed description of your financial intentions or expectations:

Yes No

Do you, or does any member of your immediate family, currently have or expect to have an ownership or other financial interest in, or management position with, any entity whose procedure, technique, product or software is used or tested in this study?

If yes, please provide a detailed description of your financial interest or management position:

Advisor/Faculty Sponsor Signature

Date

Investigator Assurance

- I certify that the information provided is complete and correct.
- I understand that as Principal Investigator, I have ultimate responsibility for the protection of the rights and welfare of human subjects, conduct of the study and the ethical performance of the study.
- I have reviewed and agree to comply with Xavier University policies on research involving human subjects.
- Informed consent will be obtained from human subjects if applicable.
- Adverse events will be reported to the XU IRB promptly via the Adverse Event Report Form.
- I am aware that all protocols approved in the expedited or full board review category are approved for one year. All subject recruitment must stop at the end of that approval period unless the protocol is re-approved for another year. Submission of a Progress Report Form is required for re-approval.

Principal Investigator Signature

Date

Checklist of items to be attached with submission:

Informed Consent

Research instruments

Approval letter from other IRB (if applicable)

Letter of permission from study/recruitment site

Debriefing text (if applicable)

HIPAA form (if applicable)

Human subject training certificate of completion

Recruitment Announcement & Instructions

Additional Documentation

Note: You may include any additional emails in this submission. Please select the default email option or add another email preference.

Student Use: Your email address and the address of the Faculty Advisor will be filled in for you. Your Faculty Advisor will review your submission and submit to the IRB.

Faculty/Staff Use: The address of the IRB will be filled in for you.

To view the attached documents, click on left sidebar and the paperclip symbol.

**** Please download this form and then complete using Adobe Acrobat. ****