

## **Speeding Up Your IRB Approval: Avoiding Application Form and Consent Form Pitfalls**

IRB approval delays are usually based on problems with either the IRB application form or the consent form, rather than on substantial “human subjects” issues of harm, deception, consent, anonymity/confidentiality and/or participant recruiting. Here are some tips to improve your IRB application process and (probably) speed your IRB approval.

### IRB Application

1. Make sure your faculty sponsor sends the IRB chair an email of support (unless you are submitting a proposal in connection with a venture grant, in which case the faculty email is not required for IRB review).
2. Read the list of vulnerable participant categories carefully before you determine that you do not have vulnerable participants. Your proposal will not necessarily be delayed or rejected if you have vulnerable participants, but if you have them and don't acknowledge this, it raises the concern that you have not thought carefully enough about protecting your participants.
3. Should you be carrying out research in another culture, or in the US with participants who do not speak English, you will be expected to work with a cultural consultant. This is in order to ensure that you don't inadvertently harm your participants through a cultural misunderstanding. Your cultural consultant should be someone native to the culture (or at least someone who has lived in it for many years), and they should be a native speaker of the local language if possible (or at least fluent in it).
4. The IRB cares about how you recruit participants because it is important to treat both potential and actual participants as individuals with dignity who deserve respect. Especially if you are carrying out research in another culture and are recruiting participants in public places, make sure that you have thought about how to recruit them respectfully, and demonstrate this on your application.
5. Applications cannot be approved without the questionnaire or interview schedule. Even if you do not have a finalized set of questions or a finalized instrument, the IRB must review your preliminary questions or questionnaire in order to approve a project. This is because in virtually all survey or interview studies, the questions themselves are the only source of potential harm.
6. Make sure to provide at least an estimate of how much time your participants will be giving up to participate in your research. “Loss of time” is considered a kind of harm, albeit a very mild one. It is a matter of respect and courtesy toward your participants that you have a rough idea of how long the research will take, and that you make that clear to them in the consent process (more on which below).
7. Even if you are fairly sure that your research will not cause your participants any stress, the application process asks you to imagine ways that it might (or reasons why it might). Take time with this question. Similarly, take time thinking about a process you would use to halt your

research project if it became clear that it was causing harm. More thoughtful answers reassure the IRB that you are ready to protect the well-being of your research participants.

8. Using deception is fine if you are carrying out a social psychology project (or certain related kinds of research), but you must provide a good rationale for using deception, and the application must include either a debriefing letter or a debriefing script that will be offered or read to each participant at the end of their participation.

9. Most IRB proposals would be strengthened by more careful and thoughtful consideration of possible ways researchers might cause harm to their participants, even if the harm is minor. If you must err either on the side of worrying too much about harm or worrying too little about it, worry too much – at least when you are writing the proposal. An honest recognition of possible harm is less likely to get your proposal rejected or delayed than is a failure to note and address kinds of harm that are plausible in the context of your project.

10. Take as much care with the issues of protecting participant identities and keeping data private as you do with the issue of harm. A surprising number of IRB proposals are delayed because the proposal is not clear about how anonymity or confidentiality will be protected, or about how data will be kept private.

11. Read the document, “Things You Need to Know Before You Fill Out Your IRB Application Form” in order to understand clearly the distinction between exempt research, expedited research, and research that requires full-Board review. Do not request an exemption or expedited review because you are running out of time in which to carry out your research, as this is not a legally acceptable reason for the IRB to exempt a project or review it on an expedited basis.

12. Proofread and spell-check any attached documents that your participants will see (consent form, questionnaire, computer screen saves, debriefing form).

### Consent Form (general)

1. Unless you have a specific reason to do otherwise, use the consent form template on the IRB’s “consent forms” webpage. If you are using a different form, please explain why in your application form.

2. After reading the instructions on the top of the form, delete all of them. When the form is finalized, the first line, which should be at the top of the page, should read “[Project title] Consent Form” where “[Project title]” has been replaced with the actual title of your project.

3. As you modify the consent form, make sure to address every item in brackets and remove the brackets. Many people miss the final bracket on the bottom of the page, just above the signature line.

4. Address each bracketed item carefully and thoroughly.

5. Unless you have a specific reason for doing otherwise, keep your consent form to one side of one page. This is a courtesy to your participants, and most of the time, if your form is longer than one side of one page, the participants won't read it carefully and their consent will therefore be incomplete. The IRB has designed the page so that virtually all projects can be addressed on one side of one page.

6. Describe your project in plain English (or other language where relevant). Particularly if your participants are not necessarily college-educated, it is not helpful to include your major hypotheses or guiding questions on the consent form, and it does not count as deception to provide a simplified description of your study. Real informed consent requires comprehension, not just information.

7. As noted above, make sure to include a reasonably accurate estimate of the amount of time it will take to participate in your research. If you are carrying out interviews and you are worried that they are too long, cut some questions rather than misrepresenting their length on the consent form. The IRB includes social scientists with enough research background to know that an interview consisting of 20 open-ended questions can't be accomplished effectively in half an hour (for example).

8. If you listed any risks in the application form, you need to list them on the consent form.

#### Parental Consent Form

1. If you are studying children in cases where you are obtaining parental/guardian consent, use this form rather than the general consent form template.

2. That said, because the two forms are very similar, all of the issues raised about the general form are also true for this form.

#### Online Consent Form

1. Use this form for online questionnaires, paper questionnaires and consent scripts for any kind of research (where you are reading the information aloud to someone). It saves space and time, and has all the legal boilerplate you need.

2. As you modify the form, make sure to address every item in brackets and remove the brackets.

3. Address each bracketed item carefully and thoroughly.

4. Because some of the template assumes an online questionnaire, you may need to revise language that appears outside of brackets, such as "and is completed online at your computer." Similarly, the text at the bottom needs modification unless you are administering a SurveyMonkey questionnaire.

### Photo/Video Release Form

1. If you are carrying out an interview study that includes photos or videos (as opposed to a study that only involves photos or videos), your participants need to fill out a regular consent form as well as this release form.
2. After reading the instructions on the top of the form, delete all of them. When the form is finalized, the first line, which should be at the top of the page, should indicate the actual title of the project.
3. As you modify the form, make sure to address every item in brackets and remove the brackets.
4. Address each bracketed item carefully and thoroughly.

Finally, if you have questions about any of these points, please contact the IRB chair, Amanda Udis-Kessler, at 719-227-8177 or [audiskessler@coloradocollege.edu](mailto:audiskessler@coloradocollege.edu).