Interchanges

Changing the Process of Institutional Review Board Compliance

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The CCCC Guidelines for the Ethical Treatment of Students and Student Writing in Composition Studies written by Paul Anderson, Davida Charney, Marilyn Cooper, Cristina Kirklighter, Peter Mortensen, and Mark Reynolds provides a common frame to help composition specialists as we navigate and discuss the various ethical dilemmas we face while conducting research. As a graduate student involved in my own qualitative research, I find the Guidelines beneficial, and I am committed to following them, including the first guideline that calls for composition researchers to comply with all Institutional Review Board (IRB) policies. However, in the past two years I have submitted proposals for the same study to eleven IRBs at colleges and universities across the country. While I strongly support the need for obtaining IRB approval, I believe as a discipline and as individuals we need to work to revise the IRB process. As it is now practiced at many institutions, the IRB process positions composition researchers and composition research in potentially problematic ways.

In fall 2000 when I began my research into the Intercollegiate E-Democracy Project, a national online project where students across the country discuss various social and political issues, I knew I had to mail consent forms to
all 400 students involved that semester, but I did not know about the need for IRB approval. But in February 2001, I read the CCCC Guidelines. The first guideline begins as follows:

**A. Compliance with policies regulations and laws**
Composition specialists learn about and comply with all policies, regulations, and laws that apply to their studies. If their work is subject to review by an Institutional Review Board, they submit plans for advance review and approval, and they conduct their studies in accordance with the approved research plans. If their studies are subject to an alternative review process at an institution that does not have an IRB, they comply with this process. Composition specialists who believe that their studies are exempt from any regulation or review process contact the appropriate committee or authority for confirmation. (486)

Reading this made me realize that I not only had to learn more about IRBs, but that I also needed immediately to seek IRB approval for my study, especially before I conducted any interviews.

Because I had narrowed the focus of my fall 2000 study to a select group of participants, I wrote to the IRB boards at four institutions, explaining my earlier mistake and requesting the appropriate forms. As I completed the forms, grateful to the IRB chairs who were permitting me to seek retroactive approval, I struggled to fulfill all of the requirements and to learn the discursive conventions of IRBs. When asked to describe how risks to the "subjects" would be minimized, I wrote, "The risk to the subjects will be minimized by the use of pseudonyms . . ."; when asked to explain the procedure for obtaining informed consent from subjects, I wrote, "Informed consent from subjects was obtained using the following methods . . ." While this discourse felt strange to me—the omission of first person, the use of the term "subjects" rather than "participants," the passive sentence construction—it was what I read in many of the directions for filling out the forms, and what I read in excerpts from the federal documents governing human research. I certainly didn’t want to jeopardize my research (any more than I already had) by not responding in what I thought was the expected and, it seemed, the only appropriate way. Like many newcomers to a discourse community, I did not want to challenge the conventions. In fact, I’m not even sure I thought about challenging the conventions; I was too intent on trying to master them to achieve the necessary IRB approval.

I think in part I did not question IRB procedures because of the CCCC Guidelines’ emphasis on compliance. In his 1998 essay, “Simple Gifts: Ethical Issues in the Conduct of Person-Based Composition Research,” Paul Anderson argues for the development of discipline-wide ethical research guidelines, and
he writes, “If we chose to emphasize compliance [to federal laws and local policies] as I am suggesting [and as indeed did happen with the Guidelines], we might appear to be substituting blind adherence to bureaucratically administered government policy for our own effort to develop ethical standards for our knowledge community” but, as he explains, we can still discuss ethical issues even as we pursue “our only responsible course of action as a discipline” which is “to insist on compliance” (72). While I wholeheartedly support the need for IRB review—I see it as essential—I think that the first guideline (A. Compliance with policies, regulations, and laws) despite Anderson’s expressed desire to the contrary, does imply a “blind adherence,” and that we need to question and work to change IRB procedures.

When I filled out forms for eight universities and colleges in fall 2001 (prior to initiating my research) and as I presented my research to comply with IRB policies, I realized that the process positioned me in relation to my study and my research participants differently than how I wanted to be because (1) many of the questions to be answered are written with scientific research in mind and don’t seem to allow (or at least not easily) for a more thorough examination of researcher-participant relationships; and (2) some IRB boards read proposals with expectations for research shaped by medical experimentation.

Many of the IRB forms I filled out contained medical questions that I find troublesome. Not so much because they take time to read and answer (even just to type n/a) but because they reflect the medical, empirical bias of the IRB process. They serve to emphasize that many IRB forms do not allow for other kinds of questions that could—and should—be asked of qualitative researchers, such as how will you define the boundaries of your relationship with your participants, particularly in teacher-researcher studies or participatory action projects? Or how will you maintain confidentiality if you share your write-ups with all participants involved? While IRBs were designed to protect and benefit participants in research, I think they are beneficial to researchers as well because of the opportunity they provide for exploring and then articulating research practices. I found many aspects of the process helpful, but as a qualitative researcher I also felt like I needed to be asked fewer questions about venipuncture and more questions about how I planned to ethically interact and represent participants in my research.

The medical bias of the IRB process not only affects the types of questions that are asked but also how a research proposal is reviewed. In fall 2001 I encountered one university’s IRB that read my proposal with strict medical
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definitions in mind. After submitting my proposal, I received a memo detailing a number of items I needed to address before the IRB could approve my study. One of these items was the IRB’s assessment that my research was not beneficial because it did not provide “tangible benefits” to participants. This denial of benefit really bothered me—and still does—because it challenges what we do as composition scholars and teachers. However, as much as that bothers me, if I had received it on one of the first IRBs I completed, I might have simply revised the benefits section of my proposal to state, “There are no tangible benefits for participants.” But because I have now completed proposals for (and received approval from) so many different IRBs, I feel more comfortable challenging the discourse—and in my revised and resubmitted proposal (which was approved) I wrote:

If tangible benefits means students will have better physical and mental health or receive money, then my study does not fit in that criteria [sic]. Perhaps tangible by IRB definitions is biased towards the social and biological sciences. Can’t a person gain benefit from reflecting upon how communication works and one’s own place in that communicative process? Unfortunately there is no feasible way for me to interview all of the students who may give me permission to read their posts. (At even a 50% acceptance rate, this would be over 200 students for the fall IEDP.) But students I do interview will have the opportunity to review and reflect upon their experience, which could be beneficial in that they may in the process gain greater personal insights. (For example, one student I interviewed last year—from a [regional] institution where I had IRB approval—mentioned that she had never thought about the impact of cultural upon communication and that she was going to re-examine her approach to argumentation.)

Although I recognize that it is often tempting to overestimate the benefits of our research, I do think that it is important that we argue for the legitimacy of our research, particularly when confronted with institutional oversight committees that may operate with different research paradigms in mind.

The federal laws may have been written with a biomedical paradigm in mind, but that paradigm doesn’t have to be the only one to govern the research reviews conducted by the local boards. Even though IRBs are set up to meet federal laws, the local guidelines and procedures can vary, and it is at the local level where change can best be enacted. To influence the discursive practices of IRBs and thus to influence their indirect and direct control over what types of research questions get asked, what methodologies get used, and what studies get completed, we need to get involved with the IRB process at our own institutions. With colleagues we should also discuss, both locally and nation-
ally, our critical reflections of the process and our suggestions for revision.

I propose two ways that the IRB process could be modified: have (1) multiple forms or multiple committees categorized for different types of studies and (2) more qualitative researchers serve on the boards and learn about the IRB process.

Several universities have separate IRBs, depending upon the type of research being conducted. The Ohio State University has a Biomedical Sciences IRB and a Behavioral and Social Sciences IRB, and the differences between the two are striking. (The full forms are available at <http://www.orrp.ohio-state.edu>.) The Biomedical Sciences IRB asks for such things as “the eligibility criteria that will be used to admit subjects into the study” and “copies of all other standard procedure consent forms that pertain to protocol; i.e., anesthesia, cardiac, catheter, endoscopy, etc.,” whereas the Social Sciences IRB form, which is the one composition researchers complete, asks researchers to

- Describe the steps you will take should a research participant become upset or distressed as a result of their participation in this study;
- Describe any circumstances under which you might be required to break confidentiality.

Written so as to recognize explicitly the role of a situated researcher, these statements address ethical issues that can arise for all researchers, especially for those engaging in qualitative studies. They should be added to IRB forms, particularly if an institution were to have separate forms for different types of research.

However, the increasingly interdisciplinary, cross-paradigmatic nature of research may make separate IRB forms feasible for only the grossest divisions (medical experiments versus all other research). As well, to change wording on forms from subject to participant and to change the questions to focus more on researcher-participant relationships may be enforcing a qualitative paradigm on empirical researchers, just as I now feel that most of the IRB proposals I submitted forced me to work within—and against—an empiricist paradigm. So if separate forms were to be used, how would the division be determined? If separate forms weren’t feasible, then how would a form be constructed that reflects and allows for multiple methodologies and theoretical frames? These are all questions that need to be discussed not only by IRBs (if they don’t do so already) but also by the broader academic community, including composition researchers.
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We also need to read the forms and procedures at our own institutions, asking such questions as how do these forms position researchers and their participants? What questions are asked and not asked? Who serves on the board? What have colleagues’ experiences been with the IRB process? I urge composition specialists to consider serving on IRB boards. Only by asking these questions and by becoming involved with the process will we be able to influence the discourse of the IRB process. And it’s essential that we do become involved because, whether we’re aware of it or not—and whether we like it or not—the discursive practices of IRBs will influence our discipline.

I want to make it clear, however, that my call to critically examine the process is not a rejection of what IRBs and IRB compliance represent because ultimately, no matter what the research paradigm, the common goal of all IRBs—and I hope of all researchers—is to ensure the protection and ethical treatment of human beings. In these regards I too affirm the CCCC Guidelines that researchers comply with the IRB process; I only suggest that we work to modify the nature of that compliance.

Notes

1. Federal law requires that all institutions where research is conducted have a local review board comprised of members of different disciplines as well as from the public community who are charged with reviewing all research proposals and with ensuring that participants in research studies are treated ethically and responsibly. In general, IRBs ask researchers to explain the following: rationale for research, methodology, procedures for obtaining informed consent, risks to participants and how those risks will be minimized, benefits of study (for participants and for field of study), and means for protecting confidentiality. For more detailed explanations, see the federal Office for Human Research Protections IRB Guidebook <http://ohrp.osophs.dhhs.gov/irb/irb-guidebook.htm>.

Works Cited
