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## Program-Level Ethics Review Procedure (for Course-Based Research)

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### PURPOSE

Ethics review is required for all course-based research involving human participants (TCPS 2 2022, 6.12). Tight academic schedules mean that course-based research can require faster turnaround times than regular research ethics board (REB) review schedules can accommodate. To avoid limiting students' academic opportunities, NBCC's REB will delegate review of eligible course-based research to a program-level committee.

This document details a procedure for Program-Level Review that ensures this streamlined process fulfills NBCC's research ethics review requirements.

### SCOPE AND LIMITATIONS

This procedure applies to NBCC Faculty supervising course-based research involving human participants, NBCC staff participating in Program-Level delegated research ethics review, and College Office of Research Enterprise (CORE) staff providing administrative support for these activities.

Projects must meet all four of the following requirements to be eligible for Program-Level delegated review. If one or more of these requirements is not met, the project requires full REB review and approval and must follow the application process described in [Research Ethics Application Procedure \(3303.4838\)](#).

1. The **risk level** must be **minimal** (see Definitions below). NBCC students are not permitted to conduct research that involves greater than minimal risk to participants.
2. The intended **participants** must not exclusively include minors, vulnerable persons, or adults incapable of giving informed consent.
3. The **purpose** must be primarily pedagogical, meaning the main objective is for students to develop skills and learn about "research methods in their field of study" (TCPS 2 2022, 6.12 & "Interpretation" from the Panel on Research Ethics: REB Review: The Interagency Advisory Panel on Research Ethics (PRE)). For clarification about projects with external partners, see section 2.1.1.
4. The project must not be part of the Faculty Research Supervisor's **research program**. This means that if the course instructor conducts independent research—including for graduate course work or a thesis—the course-based project cannot be an extension of that research or involve collecting data that will be used in the course instructor's projects.

If the purpose of the activities is *exclusively* pedagogical and human participants are students enrolled in the class, the activities are exempt from REB review. Please see Policy 3303, sec. 3.3.

### 1.0 DEFINITIONS

Please also see Definitions in the [Ethical Conduct of Research Involving Humans Policy \(3303\)](#).

### **Course-based research involving human participants**

- any research (see Definition in [Policy 3303](#)) involving human participants conducted by students for academic credit. This includes applicable in-course projects, senior technical reports, practicum projects, capstones with or without a partner, and research internships.

### **Faculty Research Supervisor**

- the course instructor responsible for supervising students conducting research and related activities as trainee researchers.

### **Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans (TCPS 2)**

- a document developed by the main Canadian federal government research funding agencies that sets the professional standards for responsible conduct of research with human participants in Canada. It also details the requirements for review and oversight of such research by institutions receiving research funding from the Canadian government. For the purposes of NBCC policy, “TCPS” refers to the current version of the policy statement.

### **Minimal risk research**

- research is defined as “minimal risk” when the probability and seriousness of possible harms resulting from participation are no greater than those encountered by participants in the parts of their everyday life related to the research topic.

### **Program-Level Ethics Review Committee**

- a group to whom the Research Ethics Board Chair can delegate ethics review of eligible course-based research involving human participants conducted within a specific academic program.

## **2.0 IMPLEMENTATION**

Program-Level Ethics Review Committees do not have a regular meeting schedule, like the REB. Instead, meetings are scheduled on an as-needed basis.

The REB Office Personnel screens ethics applications and advises the REB Chair of all applications eligible for delegated review.

The REB Chair may then delegate review of eligible course-based research to a **program-level committee** consisting of:

1. the **Faculty Research Supervisor** (as a non-voting member)
2. the Faculty Research Supervisor’s **Academic Chair**
3. an **NBCC-affiliated member of the REB**

The Academic Chair may decline to conduct reviews, either in general or in individual cases, directing applications to the full REB instead.

### **2.1 Applying for program-level review**

#### **2.1.1 Eligible projects**

As noted in the Scope and Limitations above, to be eligible for program-level review a project must pose minimal risk, be primarily pedagogical in purpose, and must neither be an extension of the Faculty Research Supervisor’s research program, nor exclusively involve human participants the TCPS dictates require special consideration.

Course-based student research involving external industry or community partners is eligible for delegated program-level review. Although providing deliverables to partners implies practical purposes beyond student learning, the TCPS dictates that the intended use of results is not a factor in determining what qualifies as “research” requiring review. The fact that instructors invent projects with fake partners to allow students to practice new skills indicates that the primary intent of providing “real-world” deliverables to partners in course-based research is to enhance the pedagogical value of the experience. When Marketing students conduct market research for a partner, they are neither developing an independent research program nor providing private consulting services. They are students learning skills in a course. The NBCC REB therefore interprets the TCPS as allowing these types of projects to receive delegated ethics review.

### 2.1.2 The applicant

The **Faculty Research Supervisor** is considered the Principal Investigator for course-based research projects and therefore **should be the applicant for the Program-Level Ethics Review Application**. As explained in the [Ethical Conduct of Research Involving Humans Policy \(3303\)](#), students are trainee researchers only eligible to apply for ethics review as Principal Investigator if they can demonstrate that their previous training and experience were sufficient to prepare them to independently design and execute the research plan.

### 2.1.3 The application process

**At least two weeks before the project start date**, the Faculty Research Supervisor must submit a completed [Faculty Application to Involve Human Participants in Course-Based Research \(3303.4672\)](#) to [REB@nbcc.ca](mailto:REB@nbcc.ca).

If students are designing their own projects, the Faculty Research Supervisor must work with them to ensure projects do not pose greater than minimal risk to prospective participants. Students may help complete the ethics application form as a learning exercise, but it must be approved and submitted by the Faculty Research Supervisor.

The Faculty Research Supervisor may opt to submit one application for a research activity or assignment that will be completed by all students in the course, including templated materials like consent forms that will be used, with minor adjustments, by all students. This can be resubmitted annually for delegated review.

If the Faculty Research Supervisor is unsure about whether a project requires ethics review or is eligible for delegated Program-Level Review, they must write to [REB@nbcc.ca](mailto:REB@nbcc.ca) requesting a written opinion from the REB Chair.

## 2.2 Program-Level Review Procedure

### 2.2.1 Committee Responsibilities

Members of delegated ethics review committees are responsible for having **comparable expertise and knowledge** as a regular REB member (TCPS 2 2022, 6.12). At minimum, they must complete the TCPS 2: CORE-2022 (Course on Research Ethics).

Program-Level Committee members are likewise required to maintain the integrity and confidentiality of the ethics review process. They must disclose any real or perceived conflicts of interest they have regarding any applications to [REB@nbcc.ca](mailto:REB@nbcc.ca), and come to

an agreement with the REB chair about the best way to resolve any conflicts prior to review. Their decisions must be reasoned and well-documented, and made impartially and independently based on the standards described in the TCPS.

### 2.2.2 Prior to Meetings

The REB Office Personnel will screen forms received at [REB@nbcc.ca](mailto:REB@nbcc.ca) for delegated review eligibility. When eligible applications are received, they will facilitate arrangements by liaising with the REB to find a member to participate in the program-level review meeting.

Before scheduling the meeting, the Program-level review committee will decide who will record minutes. This may be one of the members or a non-voting observer.

### 2.2.3 Meetings

During the program-level delegated review meeting, the Academic Chair, REB representative, and Faculty Research Supervisor will discuss each application in turn. The Faculty Research Supervisor will answer questions and, if applicable, discuss and agree to conditions or changes required for a project to be approved.

**The Academic Chair and REB representative must agree to a decision for each application.** The application may be:

- Approved
- Approved with conditions
- Rejected

The committee minutes must document review actions and decisions, and particularly any conditions or changes required for an application's approval. If the committee members are unable to reach an agreement about an application, it must be submitted to the REB for full review.

### 2.2.4 After Meetings

**The Program-Level Committee minutes must be approved by all committee members before research activities can begin.** In approving the committee minutes, the Faculty Research Supervisor is confirming that the approved protocols—including any requested changes—will be followed during the project.

As the applicant, the Faculty Research Supervisor has the right to request an appeal of a committee decision by writing to [REB@nbcc.ca](mailto:REB@nbcc.ca) within 30 days.

## 2.3 Unanticipated Issues or Project Changes

Students must **immediately report** to their Faculty Research Supervisor any **requested changes to the REB approved project or unanticipated issues, costs, or other adverse effects** suffered by the participants.

The Faculty Research Supervisor is responsible for informing students of these requirements and must report any unanticipated problems to [REB@nbcc.ca](mailto:REB@nbcc.ca).

If changes to approved projects are required, the Faculty Research Supervisor must submit a completed [Ethics Change Request Form \(3303.4725\)](#) to [REB@nbcc.ca](mailto:REB@nbcc.ca) for approval before the changes are implemented. The only changes that can be implemented without ethics review are those needed to remove an immediate hazard to research participants.

## 2.4 Academic Year-End

Faculty Research Supervisors should submit the Course-Based Research Ethics Year End Form (3303.4771) to [REB@nbcc.ca](mailto:REB@nbcc.ca) and copy their Academic Chair **by June 30th** for all completed studies that received program-level review. Each year, Academic Chairs will assist the REB Office Personnel in ensuring Course-Based Research Ethics Year End Forms have been submitted for all applications approved through program-level delegated review.

In cases where the approval was for an activity the instructor wishes to repeat the following year using the same templates, the Faculty Research Supervisor may instead submit a completed Ethics Study Renewal Form (3303.4741) to [REB@nbcc.ca](mailto:REB@nbcc.ca) **by May 31st**.

## 3.0 OTHER RELATED DOCUMENTS

### Federal Policies

Tri-Council Policy Statement Ethical Conduct for Research Involving Humans (TCPS 2)

### NBCC Policies

Integrity in Research (3301)

Research Administration Policy (3302)

Ethical Conduct of Research Involving Humans (3303)

### Procedures

Research Ethics Application Procedure (3303.4838)

Research Ethics Board Procedure (3303.4878)

### Forms

*For Applicants:*

Application to Involve Human Participants in Research (3303.4652)

Faculty Application to Involve Human Participants in Course-Based Research (3303.4672)

Ethics Review Exemption Form (3303.4705)

Ethics Multi-Jurisdictional Research Form (3303.4715)

Ethics Change Request Form (3303.4725)

Ethics Study Renewal Form (3303.4741)

Ethics Study Completion Form (3303.4761)

Course-Based Research Ethics Year End Form (3303.4771)

*For REB Chair:*

REB Annual Activity Report (3303.4781)

### Templates

Consent to Participate in a Research Study Template (3303.4650)