

Engaged in the Research: What to do to avoid your collaborators from needing their own IRB review

This seminar hosted by the University Committee on Activities Involving Human Subjects (UCHAIS) covers the basics of research with collaborators, both institutional and individual. The summary below is based on notes from the Fall 2012 session of Engaged in the Research.

Types of Collaborators

Collaborators on a study can be any individuals or institutions outside of NYU. All NYU institutions and employees are covered under the NYU IRB automatically. When working with collaborators outside of NYU, they should seek their own IRB approval from their own institution if they are “engaged in the research.”

How do I avoid my collaborator from being “engaged in the research?”

You can structure your study to avoid being “engaged in the research by following the dos and don’ts listed below.

Collaborators Can

Collaborators can still facilitate the study and not be engaged in the research by doing the following:

- The collaborator and any of its employees can give information about the study to clients, including handing out flyers, sending emails, and making phone calls, as long as they just provide contact information for the researchers and do not do the recruitment themselves.
- The collaborator can provide space for the study, which the researchers can pay the collaborators for the use of.
- The collaborator can refer clients to the researchers, but the collaborator cannot answer questions from possible participants.

Collaborators Cannot

Collaborators will be considered engaged in the research if they do any of the following:

- If the collaborator accepts payment for their involvement in the study.
- If the collaborator or any of its employees perform any of the actual research, e.g., data collection, consenting procedures, providing samples to researchers.
- If the collaborator manipulates the environment of the study site for the benefit of the study.
- If the collaborator is an author on any of the related publications.
- If the collaborator changes treatment as usual for the sake of the study.

What if my collaborator does not have an internal IRB?

If your collaborator does not have an existing internal IRB to seek their own approval from, they have three alternatives:

- 1) Form an IRB
- 2) Pay an independent IRB to review the study at a cost of \$1,500-\$15,000
- 3) Convince NYU general counsel to have NYU take responsibility for their organization

None of these alternatives are ideal, so to avoid them you can structure your study so that your collaborators are not “engaged in the research.” If they are not engaged in the research, then they do not need to have their own IRB approval.

For More Information:

[University Committee on Activities Involving Human Subjects](#) (UCHAIS)

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