Considerations for International Research

This seminar hosted by the University Committee on Activities Involving Human Subjects (UCHAIS) covers the principals of doing ethical research abroad and provides insights into how to more effectively navigate the UCHAIS system. The summary below is based on notes from the Spring 2012 session of considerations for international research.

Conducting Research Abroad

Perhaps the most important element of conducting research abroad is to have the appropriate scientific and cultural justification for your research methods, particularly when deviating from U.S. norms (which is often necessary). It is essential to have a strong local contact who can help you help to design your study paying respect to the local context. Individuals on-the-ground have the best understanding of local vulnerable populations and cultural context.

UCHAIS Review Requirements

Researchers should seek approval from the IRB abroad before applying for NYU approval. You can reach out directly to a local IRB, but many global IRBs predominantly work on biomedical research. As such, researchers often work with local university officials, community representatives or local NGOs instead of a local IRB. Any of these institutions will work as an official contact. Documentation proving you have a local contact is required.

If the local IRB requires NYU approval before they can approve the study, UCHAIS will review your protocol and give a conditional approval if it passes muster. Following conditional approval, you must submit to the local IRB abroad. Once they approve the protocol, you must notify UCHAIS and confirm final NYU approval. Remember conditional approval is NOT approval. You cannot go forward with your research until you obtain final approval from UCHAIS.

When applying for IRB approval, please make sure to do so at least six months prior to your planned departure. This can be a long and arduous process, so the earlier you can send the application in the better.

Do not apply to both NYU and local IRBs simultaneously. This ultimately leads to a much longer approval process, due to the enormous amount of communication required for simultaneous exchanges.

Generally speaking UCHAIS will approve a protocol if the local IRB approval is obtained. But researchers should not go to second local IRB if their research project is rejected. They must redesign their protocol and start from the drawing board.

U.S. versus Local Law

Remember that IRBs are local institutions, which means they are accountable to local law not US law. They are not governed by the Office of Human Research Protection (OHRP) like domestic IRBs, but many do choose to follow the OHRP guidelines anyway. HIPPA on the other hand is completely irrelevant abroad.

Consent

If literacy is low among the population you are working with, you can use appropriate forms of non-written consent. Discuss consent options with your contact on-the-ground. In the past, researchers have recorded verbal consents and used witnesses.
Be aware of the culture of consent. Some places do not hold consent as a value. Others have community representatives who first need to consent before anyone else can. Make sure to allow for these customs.

All consent language, whether written or verbal, should be understood by the participant. Be conscious of any cultural trigger words, and try to avoid lawyerly language. At the same time, do try to hit the touchstones of a typical consent in the U.S.

**Translation**

All documents including consents must be approved in English prior to translation. Unless the researcher is a native speaker (and indicates that to UCHAIS), you must use a third party who can attest that the translation has identical content to the English version. This third party cannot be the translator themselves, unless they are professional translator working for a translation service. If you use a translation service, they will automatically supply you with a letter that will attest to the fact that the translation is identical to the English. If you cannot use a service, the third party can be your local in-country contact.

When using a translator in-country to conduct your research (an enumerator), researchers must explain how they are training enumerators on ethics, recruitment, data security, and confidentiality. Enumerators must also take a human subjects tutorial. CITI is encouraged over the NYU human subjects test, which is currently being phased out.

**Confidentiality**

Data is particularly vulnerable while traveling so extra precautions must be taken. Password protection will not suffice. Thumb drives and laptops should be encrypted, and only the NYU file sharing system can be used. No other clouds are permitted. And above all, avoid paper instruments at all costs.

One NYU researcher used Skype on an encrypted computer instead of contacting participants on a cellphone, as it is safer and no one besides the researcher can track the calls.

**Incentives**

Something to remember is that incentives are not required. Incentives are simply a cultural research norm here in the U.S., but gift giving is a very culturally specific process. Make sure you are paying respect to the culture, and not being coercive or upsetting to your participants. You must confirm with your contact on-the-ground what, if any, incentive is culturally appropriate. Giving something inappropriate may even endanger researchers or participants, so please take extra caution.

For More Information:

University Committee on Activities Involving Human Subjects -UCHAIS Policy on International Research

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