

Community Engagement Review Board (CERB)

Policies and Procedures

Wagner College

(with acknowledgements to Wagner College HERB)

Purpose

Wagner College is committed to the ethical treatment of all human participants in research conducted by its faculty, staff, and students. Given The College's commitment to community-based research connecting coursework to the lived experience of people outside the college community, The Wagner College Community Engagement Review Board (CERB) is established. CERB is responsible to review community-based research done under the auspices of the college and to ensure that, in each project, human participants are treated in a just and ethical manner. Wagner College will comply with the regulations of the United States Department of Health and Human Services for the Protection of Human Research Subjects (Part 46 of Title 45 of the Code of Federal Regulations, as amended) and with the principles set forth in the Report of the National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research, entitled "Ethical Principles and Guidelines for the Protection of Human Subjects of Research" (the "Belmont Report"). Copies of both documents are available on the CERB website (*to be determined). The three basic principles of the Belmont Report are *respect for persons* (acknowledging autonomy and protecting those with diminished autonomy), *beneficence* (maximizing possible benefits while minimizing possible harm), and *justice* (sharing equitably the burdens and benefits in the population). For each community-based research project conducted through Wagner College, the CERB shall be responsible to ensure that

- 1) Any costs and risks to participants are so outweighed by the sum of the benefit to the participants and the importance of the knowledge to be gained as to warrant approval of the proposed project.
- 2) The rights and welfare of all participants will be adequately protected.
- 3) Informed consent will be obtained from all participants in accordance with CERB policies.
- 4) On-going projects will be reviewed at timely intervals (at least once a year).

The CERB shall have jurisdiction over any and all Service Learning, Civic Engagement, Experiential Learning, or other community-based research regardless of location, including the collection and analysis of data that utilize the participation of human participants in those projects that may be construed as research. In this context "research" refers to any type of information collected that may find its way into any public domain (e.g. presentations, publications, websites (including e-portfolios, Facebook, or other personal sites)). If you are in doubt about the need to go through the CERB application, please contact the current chair.

Structure

Due to the interdisciplinary nature of the projects evaluated by CERB, the committee will normally have two co-chairs drawn from the faculty of two different divisions of the College. The co-chairs of the CERB should have some previous experience with either the IRB process or

with field-based research. The co-chairs are responsible for ensuring that the CERB is completing its duties in a timely and appropriate manner. The co-chairs of the CERB shall submit an annual report summarizing the activities of the board to the Dean for Integrated Learning. Records will be kept in the Department of Anthropology.

The board shall normally have at least five members (including the committee co-chairs), including three faculty members from at least two different divisions, one member representing the administration (typically the Dean for Integrated Learning), and one member from a community group affiliated with the College. Preferably at least one member of the Board will be a proficient reader and speaker of Spanish. In accordance with federal guidelines, there must be both male and female members. The co-chairs shall provide board members with copies of pertinent federal guidelines, the Belmont Report, and any other material that might be useful to them in their deliberations.

The board may, at its discretion, invite individuals with competence in special areas, including but not limited to members of HERB, to assist in the review of issues which require expertise beyond or in addition to that available on the CERB, but these individuals shall not be considered CERB members and shall not vote on the issue of approval of any projects. Any CERB member with a vested interest in a project shall recuse himself or herself from voting.

Procedures

Submission of Proposals. Before any community-based research project conducted is through Wagner College, the investigator (or faculty sponsor if the investigator is a student) must submit to the CERB an online application describing thoroughly the plan of investigation. The plan must include each of the following:

- 1) A completed Application for Review of Research Involving Community Engagement. The application includes a question that asks investigators to assess whether their projects put their participants at no risk (defined as no greater risk than that associated with normal, everyday activities) or at risk (defined as greater risk than that associated with normal, everyday activities).
- 2) A brief description of the project. The description should follow the outline specified in Part B of the application form.
- 3) Copies of any materials to be used, including interview protocols and survey instruments.
- 4) A copy of the informed consent document or outline of verbal assent process, including written justification for your choice of consent/assent. The researcher should use the procedure most appropriate for their research population. Researchers should keep a copy of the signed form or an anonymous record of the completion of the assent process for each participant. Participants should receive a copy of the form for their own information.

The informed consent form or verbal assent information sheet should

- a) be written in a language comprehensible to the participant; if the form is being translated by someone other than the principal investigator, include description of translation resource.
- b) describe the activities in which the participant will be engaged;

- c) describe any benefits to the participant or to others which may be reasonably be expected from the research;
- d) state whether data will be collected from the participants anonymously and whether those data will be held in confidence;
- e) advise participants that they are free to withdraw from the study at any time without penalty;
- f) describe any reasonably foreseeable risks or discomforts the participant may experience;
- g) tell participants whom to contact for answers to questions about the research, about their rights as subjects, and about any research-related stress or injuries.

When surveys are administered through the mail or over the telephone, it will not be necessary to ask participants to return a signed copy of the informed consent form unless the CERB makes doing so a condition of approval.

5) A list of all principal (i.e. professor) and co-investigators (i.e. students in the course) participating in the data collection with verification (an affirmative statement by the principal investigator is sufficient) that all have reviewed the principles of the Belmont Report.

Review of Proposals.

Proposals will be reviewed under one of three conditions, depending on the potential risk or harm to participants.

1. Expedited review

If the investigator indicates on the Application for Review of Research Involving Community Engagement that the proposed project involves no risk to participants, and if either co-chair of the CERB agrees with that assessment, either co-chair may evaluate the project for expedited review.

Expedited review will be available to projects that meet all of the following conditions:

- no payment of participants
- no expectation of participants experiencing physiological or psychological stress
- no use of participants who would be judged to have limited freedom of consent such as but not limited to individuals who are minors, potentially undocumented, developmentally delayed, institutionalized, or incarcerated
- no procedure or activities that might place the subjects at psychological, physical, or social risk

If these conditions are met, a co-chair of the CERB may grant immediate approval of the project. If approval is granted, the chair shall give the investigators permission to begin data collection. One of the co-chairs may offer approval with the provision that minor procedural changes be made in the protocol. If neither co-chair approves the project, the application may be submitted for a no harm review by the committee.

2. No harm review

If a project does not qualify for an expedited review, if the investigator indicates on the Application for Review of Research Involving Community Engagement that the proposed project involves no risk to participants, and if either co-chair of the CERB agrees with that assessment, the reviewing chair will distribute copies of the plan of investigation to each board member. If at least four members provide the chair a written notice of approval of the project, no meeting will be held and the reviewing chair shall give the investigators permission to begin data collection. Board members may offer approval with the provision that minor procedural changes be made in the protocol. If the suggestions appear to the reviewing chair to be reasonable, and the chair conveys them to the investigator, and the investigator agrees to implement the suggestions, it will not be necessary to convene the board to discuss them. If at least one member of the committee does not want to approve the project without a meeting, or if the reviewing chair believes that the suggestions offered by one or more board members should be discussed, then the chair shall schedule a meeting to review the project.

3. Full review

If the investigator indicates on the Application for Review of Research Involving Community Engagement that the proposed project involves putting the participants at risk or if the reviewing CERB co-chair disagrees with the investigator's assessment that the project involves no risk to participants, the chair will distribute copies of the plan of investigation to each committee member and will schedule a meeting to discuss the project.

All members of the CERB shall be sent materials pertaining to all proposals that do not qualify for expedited review and shall be given timely notices of all meetings. No meeting can be held with fewer than four members present. The CERB shall strive to arrive at a consensus in its decisions, but no project can be approved without the support of at least four members. Decisions of the CERB can be appealed to the committee after revisions to the proposal have been made.

The reviewing chair shall notify all investigators of the board's decisions regarding their applications. Approval of applications will last for twelve months; investigators will be given an expiration date and a Project Status Report questionnaire when they receive their approval. (See CERB website).

In the event that the CERB did not approve an application, the reviewing chair will explain to the investigator why approval was not granted and will specify the changes that would be necessary for the application to be approved. The chair also shall notify investigators of their right to appeal CERB decisions.

The co-chairs shall keep file copies of all correspondence with committee members, correspondence with investigators, and minutes of all meetings (including discussions of substantive issues, the resolution of those issues, and any vote counts). All records shall be retained for at least three years on file in the Department of Anthropology.

Continued Review of Research

Investigators must complete the Project Status Report (see CERB website) prior to the expiration date of approval. If a project is still in operation but no significant changes have been made, an approval extension for twelve months may be granted. Any significant changes in the approved project require the investigators to complete an Application for Review of Research Involving Community Engagement and submit it for review.

The CERB co-chairs and the Dean for Integrated Learning should be notified of any unanticipated problems involving risks to subjects or any serious or continuing noncompliance with the requirements or determinations of the CERB.