

Institutional Review Boards and Public Relations/Mass Communication Research: Furthering the Conversation

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Scholars in the fields of public relations and other aspects of communication regularly exchange frustrations about research project approvals, arguing that the Institutional Review Board (IRB) process is rife with problems. Understandably, some academics object to expansive notions of university research and institutional commitments that result in IRBs reviewing “all” human research. Rather, IRBs need to focus their resources where they are most needed and abandon the “one-size-fits-all” mindset for identifying and reviewing research. This article furthers such views, providing examples from actually IRB deliberations, and the problems they caused for students and faculty at a university in the southeastern United States. The article offers five recommendations for promoting dialogue toward streamlining IRB protocols for undergraduate communication classes, graduate theses, and faculty research. Such conversations will promote better and more innovative research, which is greatly needed to address the complexity of our evolving global relationships.

INTRODUCTION

One of the major obstacles to student and faculty research in public relations and other areas of communication during the past decade is the emergence of Institutional Review Boards (IRBs) on most university campuses in the United States. Blanchard (2002) claims the primary purpose of IRBs is to oversee research projects that may pose potential harm in order to mitigate possible problems before they occur. According to Gunsalas, Bruner, Burbules, Dash, Finkin, Goldberg, Greenough, Miller, Pratt, Iriye and Aronson (2007), IRBs have seen their responsibilities mushroom. Not only have the number and specialization of protocols IRBs review increased as biomedical research has grown, but IRBs have expanded their jurisdiction to encompass additional fields and methodology, resulting in problems for disciplines outside the biomedical community.

The pervasiveness of such problems surfaced in April, 2003 when a multidisciplinary group of scholars held a conference at the University of Illinois on Human Subject Protection Regulations and Research outside of the Biomedical Sphere.

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This conference led to the document, *The Illinois White Paper: Improving the System for Protecting Human Subjects: Counteracting IRB "Mission Creep"* (Gunsalus et al, 2007). "Mission creep" rewards poor research behaviors by focusing more on procedures and documentation than on ethical questions or on unclear definitions, which lead to unclear responsibilities. In addition, many researchers are forced to comply with unwieldy federal requirements even when research is not federally funded.

As IRBs are asked to do more and more, their workloads have expanded beyond their ability to handle their work effectively (Gunsalus et al, 2007). As a result, terminology that might have been very clear in its original context is strained or ambiguous when applied to new areas. For example, IRBs have imposed constraints on historians conducting oral history interviews of stressful events as Holocaust memories or participation in civil disobedience during social protest movements and have made procedural requirements for conducting surveys that make them impractical (Gunsalus et al, 2007). Further, the definition of harm has expanded to more than just physical harm. It now includes protecting individuals from embarrassment and annoying questions.

The protections are now construed so widely as to confound the research process. As Blanchard (2002) argues, the simplest research project that goes beyond the classroom must be approved by a review board across campus. Scholars have even chosen not to study a particular topic or to sample certain populations (e.g., minors), because of the months of effort and time that go into obtaining IRB approval (Communication Scholars' Narratives of IRB Experiences, 2005). It is time to reexamine the goals of the system, improve its definitions, and develop common understandings of how to prioritize the dangers that need the closest scrutiny, oversight and intervention (Gunsalus et al, 2007).

LITERATURE REVIEW

In 1974, the National Commission for the Protection of Human Subjects of Biomedical Research was established and Congress passed the National Research Act. These were the first regulations in the United States protecting the rights and welfare of research participants and establishing the institutional review board (IRB) as a mechanism to protect human participants involved in research. According to Title 45 Code of Federal Regulations (CFR) Part 46.102(d), research is defined as a systematic investigation designed to develop or contribute to generalizable knowledge. The primary purpose of the IRB is to protect the rights and welfare of research participants (Hunt & Yekel, 2002).

Institutional Review Boards were initially created to protect human subjects involved in medical research (Hunt & Yekel, 2002). Over the years, the biomedical paradigm has governed the research reviews conducted by university review boards (McKee, 2003). As the level of bureaucracy has grown, so have the time between

submission of applications for IRB approval and the actual approval. In some cases, the time for the project has passed (Blanchard, 2002).

Academic research falls under the purview of the IRB. Researchers in journalism and mass communication are addressing sensitive topics such as sexual behavior, drug and alcohol use and abuse, and Web-based pornography. These types of studies can place participants at psychological risk, which is more difficult to assess and protect for than physical risks (Hunt & Yekel, 2002).

According Dougherty and Kramer (2005), the IRB's tendency to deviate from its narrow mission of protecting human subjects has become a significant barrier to conducting even low-risk projects. Research that should be exempt is increasingly being scrutinized. IRBs have expanded the definition of risk to include activities that fall far short of the significant physical and psychological abuses of the past (p. 187). Even though some requests are exempt from full- committee review, the instructor must budget time for the appropriate IRB administrator to approve the proposal and the amount of time needed for this varies from school to school (Jenson et al, 2003). For example, IRB approval for exempt and expedited submissions may take anywhere from one to six weeks.

Many social science researchers describe working with the IRB at their institutions as an agonizing problem (Fitch, 2005). Some researchers hesitate to challenge IRBs because they worry that this attention will lead to further scrutiny by the IRB (Carpenter, 2007).

In 2005, Koerner identified five categories characterizing the relationship between communication scholars and IRBs ranging from antagonistic actions of IRBs and negative perceptions to positive perceptions of IRBs and protagonistic actions of IRBs. The results of Koerner's study indicate that the main difference between positive and negative experiences with IRBs was associated with the nature of the relationship between scholars and IRBs. Scholars who saw their IRBs as adversarial bureaucracies had the most negative experience whereas scholars who saw their IRBs as partners in the research process had the most positive experience. The main difference between positive and negative experiences was that in positive accounts, scholars and IRBs were both able to achieve their objectives with minimal inconveniences for the scholar. Every time the scholars felt that their IRBs were responsive to their needs, they were more motivated to comply with IRB requirements.

The narratives also show that how scholars perceive IRBs and act also affects their relationships with IRBs and ultimately how IRBs reviewed their applications. Often IRB members have little experience with communication research and need to be educated about it. By focusing on common goals and ways to achieve them, scholars can establish collaborative relationships with their IRBs (Koerner, 2005).

Many concerns lodged against IRBs include (1) that "IRBs are applying a clinical/biomedical research model to social science research --- a model that does not

fit” (attributed to J. Knight, Consortium of Social Science Associations, 2000b, p.3), (2) that “IRBs focus too much on paperwork and procedure,” and (3) that they are “caught in the middle” between researchers and subjects, thereby introducing little other than “impediments to research” (attributed to G. Koski, Consortium of Social Science Associations, 2000a, p. 4). At times IRBs also seem to become co-opted by their bureaucratic contact; the avoidance of institutional liability becomes the preeminent concern.

But what about research in areas of communication that are not sensitive, but merely attempts to measure such germane behaviors as television viewing habits, purchasing or charitable contribution behaviors? What about research to better understand personal interactions, cultural misunderstandings, and the complexity of global norms? Courses emphasizing such research usually fall under exempt status because they entail survey research and the results are not generalizable. However, even though a professor believes student project are “exempt”, students must submit the paperwork to prove to an IRB official their exempt status. In some cases, the opportune time for project completion passes as paperwork becomes delayed (Blanchard, 2002).

Educating one’s IRB about one’s own research requires researchers to avoid perceiving IRBs as adversarial bureaucracies and to approach them, instead, as institutions that share important values with researchers. By focusing on common goals and ways to achieve them, scholars can establish collaborative relationships with their IRBs and come to appreciate the IRB process (Koerner, 2005).

The most frequent complaints are that IRBs use a biomedical research model that has little applicability to social science research (Koerner, 2005). While IRB guidelines for student projects may strike both students and their instructors as bureaucratic red tape upon closer examination, IRB principles offer students learning opportunities at several levels, ranging from the practical to the ethical. Students can inevitably benefit from learning about the IRB process (Jenson et al, 2003). In addition, IRB approval offers protection. Having the IRB behind one’s research protocol can protect the researcher and the participants (Communication Scholars’ Narratives of IRB Experiences, 2005).

In sum, researchers acknowledge that IRB oversight can greatly aid scholarship; however, there are variations in oversight needs among the diverse fields of research.

CASES IN POINT: UNTIMELY REVIEW

Examples from class projects in the Department of Communication at the University of South Alabama illustrate some of the problems for securing IRB approval in non-medical qualitative research. In the spring of 2004, students in a graduate-level, qualitative communication methods course were assigned to complete individual practice research projects that included ethnographic field work, interviews, and focus groups. For this project, students completed a two to three hour, on-line IRB

certification program. They were required to complete a full IRB application for their projects even though their work was for practice, and they had to complete the projects within the semester.

Students selected such projects as perspectives of masculinity as constructed in a bar environment, communication of identity in a Korean-American community, communication practices of Muslim women at Friday morning prayer meetings, and other social practices. Planning the research projects was challenging in itself; however, the IRB process became daunting. According to IRB instructions, the student projects did not qualify for exempt review, rather for expedited review. The expedited review process took two months or more as students scrambled to meet reviewer demands.

For example, the student who wanted study communication practices of Muslim women obtained written consent from the minister of her church as well as from each woman who attended the prayer meetings. Approval, however, was stalled by wording on the consent form, a research question found unsatisfactory by an individual who specialized in quantitative medical research, or other issues not related to the potential harm of subjects. One medical researcher on the review panel did not see why this project should take place. In an era of increasing tension among Muslims and non-Muslims, how can a non social scientist have the authority to make such judgments?

After much interaction between the reviewer, the student and the professor, the project was finally approved, but not in time for the observations and analysis to take place during the semester. Other students experienced similar frustrations. By the end of the semester, most of the student projects had not been approved due to minor infractions rather than potential harm to participants. How can student develop the skills needed for effective qualitative research with such constraints?

Even quantitative communication research can face untenable constraints. Another class selected an internet net-based survey targeted to public relations professionals at NCAA schools. This application was sent to a reviewer who did not understand the jargon associated with the field of public relations. The reviewer rewrote several questions and made grammatical changes after the survey had already been approved by the faculty advisor, resulting in some meaningless survey questions. Communication problems can also occur between IRB administrators and individual reviewers. For example, a reviewer went on sabbatical without alerting the IRB office leaving three applications in limbo for almost an entire semester.

IRB Options

According to Pam Horner, the IRB Compliance Officer at the University of South Alabama, "the IRB doesn't have to be the enemy." (personal communication, Jan. 15, 2008). Horner states that federal regulations allow each IRB to set their own standard operating procedures as long as they remain within the confines of the federal

regulations. Yet, even with such flexibility, IRB officers are constrained by university positions as well as by who is selected to become reviewers for research projects.

Gunsalus and colleagues argue that not all scholarly writing for publication should be subject to the same kinds of review and suggest that work from different disciplines might go through entirely distinct review processes (2007). In 2005, the IRB at the University of South Alabama conducted a review of its policies and procedures. The IRB administrators discovered that the majority of submissions were from colleges within university that were not bio-medical, and the research was non-clinical. As a result, the IRB separated Clinical/Bio-Medical research from Behavioral/Social Science research and created a full-time compliance analyst dedicated to Behavioral and Social Sciences. Separate application forms were also created for these areas.

The administrators also discovered that the majority of the applications fell into the exempt or expedited categories. As a result, the IRB created a sub-committee of expedited reviewers. The Expedited Sub-Committee of the IRB consists of a psychologist, an educator, and a sociologist. The expedited applications are sent to the respective reviewer based on the subject matter of the research. For example, Internet-Based Research falls into the expedited category as long as the human subjects are adults. However, research involving minors may also fall into the expedited category if the risk is minimal. The IRB compliance analyst handles these applications on a case-by-case basis (Pam Horner, personal communication, January 15, 2008).

Many universities have decided that students' class projects are not research because they are not designed to contribute to generalizable knowledge (Jenson, Mackiewicz, & Riley, 2003). The IRB at the University of South Alabama requires all undergraduate and graduate students to submit IRB applications and graduate students must have IRB approval for theses involving human subjects. However, while some university IRBs can take up to 30 to 60 days to turn applications around, the IRB at the University of South Alabama can turnaround an expedited submission in approximately two weeks and an exempt submission sometimes in one day. The IRB compliance officer also has the latitude to override a reviewer if the office believes the reviewer being overly particular about correcting grammar or rewriting survey questions (which should be the domain of the professor).

The application process itself has also been streamlined. Exempt and expedited review forms were non-existent prior to 2005. Exempt applications do not require renewals. The seven page Full Review Application form was reduced to two pages; the Student Form was downsized to three pages and an Exempt Form was created that is currently two pages.

The IRB also offers an annual seminar entitled "IRB 101". The seminar educates faculty and students in the Behavioral and Social Sciences on IRB requirements for conducting research in an effort to help the application process go quickly and smoothly. A representative will also conduct "IRB 101" to individual classes upon request from the faculty member.

Finally, the IRB created “The IRB Handbook for the Student Researcher” that serves as a guide to the application process. The handbook is written straightforward language, without medical or laboratory jargon, to help students understand the application and review process. In sum, IRBs are becoming increasingly aware of the need to accommodate fields outside of the bio-medical community. Some boards are reviewing their protocols and considering options for differing disciplines. As scholars, particularly in the discipline of communication, our role must focus on continuing the dialogue on options for streamlining the IRB process, especially for in-class projects.

CONCLUSION

Promoting effective relationships between communication scholars and their IRBs will enable more and better research in such disciplines as communication (Koerner, 2005). IRBs should be more flexible in applying rules and more responsive to scholars’ needs rather than alienating scholars by dogmatically insisting that all research fit Rib’s bureaucratic mold (Koerner, 2005). Scholars should promote networking with the IRB staff to encourage productive relationships. In addition, an ongoing dialogue among scholars should raise awareness of what institutions are doing to bridge the gap between medical and non-medical research.

Certainly, research subjects must be protected from overbearing interviewers or loss of privacy. However, students need real-world skills for research, optimally through such means as active research and practice in naturally occurring situations. Class projects should have stream-lined IRB reviews to fit class time frames. Field-specific conversations should address current research needs and further consensus about IRB options in higher education, in particular, concerning the following topics:

- Separate review boards for medical research and non-medical research
- Separate review boards for quantitative and qualitative research
- A special committee for expedited class practice projects
- Conversations refining Internet-based research
- Conversations refining appropriateness of studying minors in public environments

Such conversations will undoubtedly result in better and more innovative research, which is greatly needed to address the complexity of our evolving global relationships.

References

- Blanchard, Margaret (2002). Special problems for journalism and Mass Communication Scholarship. Symposium: Compliance or Concern: Institutional Review Boards in Journalism and Mass Communication Education. *Journalism & Mass Communication Educator*, 57(2), 95-99.
- Dougherty, Debbie S., Kramer, Michael W. (2005). A Rationale for Scholarly Examination of Institutional Review Boards: A Case Study. *Journal of Applied Communication Research*, 33, (3), 183-188.
- Elliott, Deni. (2002). A clash of cultures, an opportunity for ethics. Symposium: Compliance or Concern: Institutional Review Boards in Journalism and Mass Communication Education. *Journalism & Mass Communication Educator*, 57(2), 100-102.
- Fitch, Kristine L. (2005). Difficult Interactions between IRBs and Investigators: Applications and Solutions. *Journal of Applied Communication Research*, 33(3), 269-276
- Gunsalus, C.K., Bruner, Edward, M., Burbules, Nicholas C., Dash, Leon, Finkin, Matthew, Goldberg, Joseph P., Greenough, William T., Miller, Gregory A., Pratt, Michael G., Iriye, Masumi and Aronson, Debbie (2007). The Illinois White Paper: Improving the System for Protecting Human Subjects: Counteracting IRB "Mission Creep". *Qualitative Inquiry*, 13 (5), 617-64.
- Hunt, B. & Yekel, C. (2002). Moving from compliance to concern. Symposium: Compliance or Concern: Institutional Review Boards in Journalism and Mass Communication Education. *Journalism & Mass Communication Educator*, 57(2), 92-95.
- Jenson, Jill D., Mackiewicz, Jo, Riley, Kathryn. (2003). Human Subjects Research by Business Students: Beyond the Red Tape. *Business Communication Quarterly*, 66 (2), 9-22.
- Koerner, Ascan F. (2005). Communication Scholars' Communication and Relationship with their IRBS. *Journal of Applied Communication Research*, 33(3), 231-241.
Communication Scholars' Narratives of IRB Experiences. *Journal of Applied Communication Research*, 33(3), 204-230.
- McKee, Heidi. (2003). Interchanges. Changing the process of institutional review board compliance. *CCC* 54(3), 488-492.