

The Top 10 Ways to Persuade an Institutional Review Board to Reject Your Research Proposal

In response to the *Quarterly's* call for articles on ethics and responsible conduct of research, we wondered what unique contribution we might make to the conversation about research ethics and the training of undergraduate researchers. Our experience as members our local Institutional Review Board has been that issues regarding federal regulations and committee procedures that matter to faculty and administrators are of little interest to undergraduates who have the opportunity to participate in authentic research. Rather, undergraduate researchers tend to view the research enterprise from their own perspective. They are eager to engage in their work, they worry about deadlines and completed projects, and they may view IRB procedures as just one more layer of college or university bureaucracy.

In thinking about the student perspective, we decided to risk an article that is directed to the undergraduate researcher. We also decided that humor might be a medium through which some lessons about ethical conduct might be learned. Therefore we offer the following tips as a helpful learning aid for undergraduate researchers. (We actually think some of our advice will be of value in many environments.) We hope that our tongue-in-cheek advice will be taken in the spirit in which it is intended, and we hope that faculty readers will share this article with their students as the undergraduate researchers plan to submit a research proposal to their Institutional Review Board. The tips also will be useful as part of general discussions of research ethics.

Tip 1 for IRB Rejection: Give the IRB No Time to Review the Proposal.

Ideally, submit the proposal 24 hours before the research project is to begin. Our IRB attempts to accommodate the busy schedules of its members by eschewing unnecessary meetings, working by email, or employing the option of “expedited” review. These strategies allow the IRB to respond to requests in a reasonable time. Nevertheless, it will still take more than a day to review a research proposal. To guarantee a rejection by the IRB, don't submit it two weeks ahead of the time the research project is to start—that might result in the proposal's actually being reviewed and approved. No. Instead, for stu-

dents who enjoy a thrill, turn in the research proposal during final exam week with the stated intention of finishing the project by the end of the term.

There is a corollary to this principle. Many colleges, including ours, are seeing an increase in the number of undergraduate researchers who do their projects in the summer months. To have summer research delayed or rejected, submit your research proposal in July and expect quick approval. We wish we could report that student researchers submit proposals to the IRB in July for work to take place in the upcoming fall semester, but this is typically not the case. The typical proposed research is to take place as part of a summer research project—in July. At many colleges like ours, however, summer is a period in which committees seldom meet and faculty members often travel. Thus the IRB does not function continuously. The inability of the IRB to review a proposal in midsummer is as good as a rejection.

Tip 2 for IRB Rejection: Don't Bother to Become Informed.

The ethical treatment of human research participants requires familiarity with a variety of rules, ranging from knowledge of the IRB process to informed understanding concepts such as consent and beneficence. But if you want to have your proposal rejected, why bother to take the initiative? When submitting an IRB proposal, write a cover letter that implies you are submitting the proposal only because your faculty adviser insists on it. Don't let on that you have seen—or even heard about—the IRB Web page with its information about how to ethically conduct research with human participants. Do not complete any tutorial or educational program that might earn you certification in the ethics of human-participant research.

Tip 3 for IRB Rejection: Submit an Unformed, Poorly Written Proposal.

IRB proposals require the inclusion of a narrative describing the study, because a detailed description helps the IRB understand the purpose and rationale for the project, as well understand the research experience from the point of view of the research

subject (“participant” in IRB parlance). For those who want their research proposals turned down, it is unwise to make these narratives too clear since IRB members then might understand what the researcher wishes to do. Most IRB members are also teachers, so it is easy to alienate them by using misspelled words and poorly constructed sentences. Absurd images are useful distractions. For example, if you intend to do an experiment and randomly assign human participants to treatment groups, write “the participants will be marked with numbers and thrown into a hat.” For a procedural absurdity, write “the participant will be assured anonymity and then the interview will be videotaped.”

To obscure your research plan, submit less-than-final drafts of your research proposal. An IRB can only approve research proposals that specify how the human participants will be treated. This specification includes final versions of interview protocols and surveys. If this principle seems too straightforward, don’t submit the final materials but write “I’m thinking of asking people about their sexual behavior” or “I will construct a survey that has participants indicate which illegal drugs they buy and use.” In preparing a proposal, remember that reviewers are impressed with a big idea. The excitement of yours can be conveyed in the title of the proposal, such as “The Effect of Alcohol Consumption on Memory for Traffic Signals” or “The Limits of Treadmill Endurance by Undergraduate Asthmatics.”

Tip 4 for IRB Rejection: Badger Potential Research Subjects.

Participants in research can be finicky. They don’t appreciate how important it is for you to get project done. The rules say that people have the freedom to decline to participate in the research study, that they can decline to answer individual questions, or that they may leave the study at any time. An ethical researcher designs a study that permits the potential participant to exercise her rights without going to great effort. But if you incorporate these considerations into your proposal, you risk having the IRB approve it. Instead, insist that as a researcher you need large samples, although you haven’t investigated “statistical power analysis,” a technique that may inform you of an optimal sample size. Freedom to decline undermines sample size. In your proposal, you can combat this annoyance in various ways. First, if a person declines to participate, plan ask him or her if you can interview them as to why they decline to participate. If they decline to be interviewed, plan to ask

them if you can interview them about why they declined to be interviewed about why they declined to participate, and so on. They will eventually cut their losses and agree to meet your original request.

Alternatively, announce that you will use the college or university email system to send out mass emails (probably in violation of college policy) inviting participation in your study. Plan to send plenty of reminders, and don’t remove recipients who have already participated. For online surveys, construct the software program so that the participant cannot exit the site until all of the questions are answered. Children pose a special problem for participation, as they need the permission of a parent or guardian as well as giving their own consent. Compose a consent letter for parents to be carried home from school by the children. Make sure the letter says, “If you wish to have your child in this study, please discard this letter. Sign and return only if you do not wish your child to be in the study.” Phrasing consent in this way guarantees a high participation rate, bolstered by those consent forms that were lost, made into paper airplanes, or left in the bottom of a backpack.

Tip 5 for IRB Rejection: Manipulate the Concept of Minimal Risk.

At our college, most undergraduate research involves only minimal risk to the participants. Minimal risk means that the probability and magnitude of harm or discomfort anticipated in the research are not greater, in and of themselves, than those ordinarily encountered in daily life or during the performance of, or participation in, routine physical or psychological examinations or tests. Minimal-risk studies may often be expedited by the IRB chair, so it is in your interest to have the proposal rejected by distorting the claim that your study involves only minimal risk. If the IRB objects to certain experimental procedures in your study, point out that the amount of illegal drugs and alcohol encountered in the daily lives of students you hang out with is actually higher than the doses you intend to use for your experiment. Also point to the high crime rate in your neighborhood and argue that the research participant is relatively safer during your study than he is walking home afterwards.

Table 1. A Quick and More Serious Summary of the Ten Tips.

1	Find out how much time the IRB needs to review a proposal. Allow time for a review and possible revision.
2	Become familiar with IRB vocabulary, including such terms as “informed consent” and “beneficence.” Federal rules now require some sort of training in research with human participants, so ask the IRB about possible training requirements.
3	IRB forms frequently have a number of questions that can be answered with simple yes/no responses, but the IRB will also require a project description. In this description, as with all other work, good writing will facilitate a good review.
4	Avoid the temptation to bother or badger potential participants. The right to decline participation is a key point in ethical research practices.
5	Become familiar with the concept of minimal risk. Don’t be egocentric about assessing minimal risk.
6	Approaching a participant with no warning may lead to an authentic response, but weigh the efficacy of this approach against the rights of the participant.
7	Learn the difference between anonymity and confidentiality. Be aware that the use of quoted verbal responses or the use of audio or video images poses problems for the promise of confidentiality.
8	Deception is sometimes employed in situations in which the participant might disguise his or her authentic response in order to seem socially appropriate. Deception, however, needs to be weighed against the rights of the participant. Try to minimize deception.
9	Researchers need to become familiar with the principle of justice, requiring that subjects be treated fairly and not stereotyped.
10	Research projects occur in the contexts of time and place. The end of data collection does not mean the end of securing data and other records. The timing of a project can be scheduled to minimize conflict with other research.

Tip 6 for IRB Rejection: Go for Surprise, Rather than Informed Consent.

Federal guidelines on ethical research state that respect for persons requires that potential participants be given the opportunity to choose what shall and shall not happen to them. For participants to give their informed consent to take part in research, the research needs to disclose relevant information about the research, ascertain that the participant understands the information, and voluntarily agrees participate. To have a research proposal rejected by the IRB, propose research without informed consent. Assume that everyone loves a surprise, and that members of the IRB are no exception. Expect that they should be enthusiastic about your proposal to enter local dormitories unannounced, knocking on doors and shouting, “Quick, name the nine justices of the Supreme Court!” at whoever answers the door. Any stress felt by the participant will be mitigated if you remember our tip below to debrief the participant. Explain that you are conducting a study on how ignorant American college students are about their own government.

Tip 7 for IRB Rejection: Confuse Anonymity and Confidentiality.

Research participants are anonymous if they did not provide identifying information or if their identity cannot be linked to their data. Face-to-face interviews, audiotaped and videotaped interviews, and signed statements are not anonymous to the researcher. Confidentiality, on the other hand, has to do with the researcher promising to keep anyone from connecting the data to the participant’s identity. To keep the IRB members from approving your proposal, promise anonymity when you mean confidentiality. Or take anonymity to a higher level by leaving your name off the IRB proposal.

Tip 8 for IRB Rejection: Justify Deception by Promising Debriefing.

According to ethical guidelines of the American Psychological Association, “methodological requirements of a study may make the use of concealment or deception necessary. Before conducting such a study, the investigator has a special responsibility to (1) determine whether the use of such techniques is



The eye movements of a child viewing a picture are recorded in the psychology laboratory of Prof. Ann Ellis at Grinnell College as Prof. Ellis monitors the instruments.

justified by the study's prospective scientific, educational, or applied value; (2) determine whether alternative procedures are available that do not use concealment or deception; and (3) ensure that the participants are provided with sufficient explanation as soon as possible." One good tip for judging whether deception should be used is to ask how embarrassing the participant's expected response is. People tend not to embarrass themselves if they know what's coming. When deception is employed in a study, debriefing the research participant after a research procedure is recommended. For a dubious proposal, claim to have complete faith in the belief that debriefing, also known as "dehoaxing," or more commonly "apologizing," can erase any harm caused by the procedure. Be sure to provide the IRB with a debriefing script. Use quotation marks to clarify deception in your written debriefing script, for example, "The 'police officer' who 'arrested' you after the other 'participant' had a 'heart attack' during the 'fire' ..."

Tip 9 for IRB Rejection: Make Your Stereotypes Work for You.

The exclusive use of one kind of research participant, for example, men, has been called into question on both ethical and scientific grounds. Federal guidelines include "the principle of justice," a requirement that research subjects be treated fairly. For example, regulations of the National Institutes of Health state that "subjects should be carefully and equitably

chosen to insure that certain individuals, or classes of individuals are not systematically selected or excluded, unless there are scientifically or ethically valid reasons for doing so" (<http://ohsr.od.nih.gov/info/sheet11.html>). The unexplained or nonsensical exclusion of participants might be the key to getting your proposal rejected. Institutional Review Board members might balk, for example, at a study of violence among fourth-grade boys even before they read the part about the weapons. They may ask why the study is limited to boys. Why not study girls as well?

To defend your proposal you need to make creative use of your stereotypes. You could say, for example, that girls are a confounding variable because everybody knows that girls are naturally sweet and tend to civilize boys. Not only does this assertion display knowledge of experimental design, but you can hope that some of the men on the IRB have a history of being confounded by women. You may also rely on your stereotypes to generate hypotheses. Propose comparing the attitudes of on-campus college students with those of local residents, better known as "townies." Use a telephone survey to ask their opinion of a controversial issue, such as the legalization of gay marriage. Hypothesize that college students, being liberal, will approve, while townspeople, being conservative, will object. Propose avoiding the monotony of making repeated phone calls by including your own college professors and six-year-old children on your call list.

Tip 10 for IRB Rejection: Ignore As Many Principles as Possible.

IRB protocol requires the researcher to state how records will be kept, including what security there may be for data and at what point data might be destroyed or disposed of. Leaving surveys around, allowing data files to be copied, or permitting videotaped interviews to be uploaded to YouTube violate the ethical use of information gathered during a research project. To alarm the IRB, point out that these violations might raise your personal profile and attract more fans to your Facebook page. In addition, some colleges offer undergraduates extra credit or other rewards for participation in research, requiring the researcher to provide a list of participants to a research coordinator to complete the reward process. For these reward situations, suggest that it is okay to fail to record the names of the students who participated in your study for extra credit. Explain that extra credit points are valuable and professors

don't like to waste them, so your failure to live up to the promise of rewards saves the professors points.

While writing an IRB proposal is a challenge, take pride in the fact that, if approved, you may be clogging the system with ill-timed research. The Institutional Review Board is in an excellent position to appreciate the frequency and scope of on-campus research; it will know when your proposed research competes with other research under way on campus. A great deal of routine institutional assessment and evaluation research goes on, including the institutional use of national surveys such as the National Survey of Student Engagement (NSSE), surveys of physical health and mental health, and other measures related to the assessment of student learning or to the institution's efforts to improve the quality of its programs and campus climate.

As a fellow survey researcher, you can appreciate how important it is to have a good response rate to these surveys. But assert that your survey is more important. Propose to distribute your survey at the same time that the college is collecting data, thus inundating the student population with competing surveys. Note that you can boost your response rate by allowing the students to confuse your survey with an institutional one. If you are competing with NSSE, for example, name your survey "Ned's Survey of Student Entropy."

If you follow our 10 tips for IRB research proposals, we are sure your proposal will be rejected. If, against all odds, the proposal is approved, resolve to be an ethical researcher, keeping in mind that some philosophical systems claim that the first ethical principle is to Look Out for Number One. Don't worry if the local school principal or day-care director objects to your presence at their institutions. Insist that IRB approval is a mandate, sort of like a subpoena. Don't worry about the legal ramifications or the illegal immigrant you are interviewing for your sociology study. Don't protect the confidentiality of worker who is complaining about her supervisor during your industrial-psychology project. She didn't like her job, so you did her a favor. Remember that you are a student, and students have rights. Remember that the ethical conduct of research includes the ideal of beneficence, which means to minimize harm, or in your case, minimize harm to your plan to graduate.

If, in the end, your research proposal is rejected by the IRB, and you need a research project in order to graduate, consider doing research overseas. Although our IRB requires a

proposal for research conducted while on overseas programs, who would know? Take advantage of the rare opportunity to tour the countryside to survey revolutionaries or to interview wild-animal poachers. One final tip: Turn on the GPS function of your cell phone. It can be used as homing signal by search parties.

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