IRB Guidance on Survey Approvals & Survey Tips

Institutional Review Board and Information Collection

We need to distinguish between these two different organizations, that address two different concerns that are related to your research.

The IRB is part of NPS's Human Research Protection Program, which focuses on protecting human subjects IAW the Federal Government's "Common Rule", as implemented by the DOD, DON, and other relevant regulatory agencies. The IRB reviews and monitors research involving human subjects to ensure relevant projections are in place.

Information collection is a general term that includes surveys, interviews, focus groups, questionnaires, etc. Each service has its own Information Collection Office (a.k.a. Survey Manager) and Licensure Office (some collections require a license, some don't). Importantly, NPS does not have its own survey management function, so all IRB approvals are *contingent* upon receiving the applicable Service survey manager approvals.

NPS IRB is your single point of contact for IRB issues, and we will help you coordinate with other Information Collection offices.

NOTE: The USMC requires its own separate IRB review for all studies that focus on Marines as the sample/population, and the USMC IRB Chair will coordinate with the USMC Survey Manager. This requirement does not apply if (1) Marines are *part* of your sample/population, but only if they are the only sample/population, and (2) if the purpose or focus of the study is not a UMSC topic or issue. For example, a survey of all NPS students includes Marines, they are not the sole sample or population, and the survey is on video game experience, so this project would not require separate USMC IRB approval.

Information collection requirements vary across services

Each service has its own instruction/regulation on the review of information collections that provides:
- A list of exemptions
- Process for obtaining approval
- Statement of when the instruction is applicable.

The list of exemptions is not consistent across the services. Here are a few representative examples. The Navy has a one-command exemption; if we keep the information collection to one single command, then Navy Survey Manager approval is not required. The Army, however, requires review and approval for all surveys.

Key information collection differences across the services. (Again, these are representative examples, and not an exhaustive list.)
- Air Force: USAF will not approve a survey if the purpose of it is solely student-based research. The students will need a Flag Officer or SES to state in writing that he/she is asking for the study and that it directly benefits the USAF.

- Army: All surveys require Survey Manager review *and* Licensure. However, there are exemptions for non-survey collections.
- Marines: The Marines have their own survey office. However, if the collection includes both Navy and Marines and involves a survey, it goes to the Navy Survey Manager for approval.

Information collection from more than one service

Collections that cross more than one service (e.g., Navy and Army, Army and USAF) require DOD approval from the Office of People Analytics (OPA). <u>This could take several months</u>; however, they have told us they could review a draft submission within a few days and let us know if it meets an exemption category.

Information collection from the general public

Collections from members of the general public (Non-federal, Foreign Nationals, DOD Contractors, military dependents, retirees) require **OMB** approval. These packages are routed through the Navy Information Management Collection Officer (IMCO), Barbara Figueroa. Ms. Figueroa will determine if an exemption applies and if not, whether the collection would meet the criteria for a Fast Track Submission (4 months turn around). If a package does not qualify for the fast track, it will go through the long process. Ms. Figueroa's office would provide us with all the forms and help us through the process. Ms. Figueroa's office also helps with packages that require OPA review and approval.

General advice to Expedite Information Collection Approval

We fully support the idea that research questions should drive research design. We also acknowledge that student research, particularly, faces graduation-based timelines, and that leaving campus with an incomplete thesis or capstone project is undesirable. We offer this general advice:

Our best practical advice: Focus your study, if possible, on one service, better yet one command, and if possible, only people at NPS.

If you must collect information from more than one service, we can consider separate information collection requests through each individual survey manager.

The IRB will help you work with all relevant offices and can refer you to faculty on campus who have successfully completed whatever process you need to follow.

If you need to collect information from outside NPS, a Flag-level authorization might be helpful, and sometimes is required.

In general, information collection from nine or fewer subjects (e.g., interviews) offers some relief. For example, you may interview nine or fewer members of the general public without OMB approval.