



**Guidelines for Authorizing  
Access to Notre Dame Students  
for Research Purposes**

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## 1. INTRODUCTION

Researchers often seek to conduct investigations using Notre Dame students as subjects. These guidelines provide direction for the University's management of such requests. Concerns include (a) promoting high quality research, (b) protecting students from inappropriate intrusions into their privacy, (c) ensuring that the mission of the University is communicated to the public, (d) guarding against negative impacts on the University's reputation, and (e) guarding against over-studying Notre Dame populations. Formalizing the procedures for authorizing access to students has the added advantage of broadening the number of offices with knowledge of the topics and subpopulations being researched at any given point in time. As would be expected of any research involving subjects accessed through an organization (e.g., hospitals, community centers, high schools, or special interest associations), these guidelines are intended to ensure effective cooperation between researcher and access organization. In this case, the access organization is the University of Notre Dame.

Note that these procedures involve two electronic form platforms: (1) eProtocol (maintained by the Office of Research Compliance) and (2) a Qualtrics form (maintained by the Office of Strategic Planning and Institutional Research). eProtocol is designed for interaction between the researcher and the Office of Research Compliance and consists of steps for collecting all of the information about a research proposal that is necessary to determine whether it can be approved on ethical grounds. That system, however, is not suited for routing and amending information from one office to another. The Qualtrics form option can execute the latter. For the sake of

efficiency, these procedures require the researcher to submit information exclusively in eProtocol, while the University administrator, from whom approval is required, works exclusively with Qualtrics forms. The Office of Strategic Planning and Institutional Research acts as the connector between the two systems.

## **2. PROCEDURES. See [Appendix A](#) for a Summary Overview of these procedures.**

### **2.1. Applicable Subject Populations**

These guidelines apply to requests for access to Notre Dame enrolled and recently admitted students (hereinafter referred to as “Notre Dame students”) for the purposes of research. Access to students who have not reached the age of majority will not be granted for the types of research governed by these guidelines.

**2.1.1.** These requests can come from two distinct categories of investigators. The form to be completed by the investigator will be tailored to the two categories.

**2.1.1.1.** Notre Dame faculty, staff and students must submit an application to the Notre Dame Office of Research Compliance (ORC). No research can be conducted until approval is granted by the Institutional Review Board (IRB) or an exemption is granted by ORC.

**2.1.1.2.** All individuals and organizations not affiliated with Notre Dame must submit a written or email request for access to ND students outlining the purposes and methods of the research. This request may or may not require submission of an application to ND’s IRB. It is, therefore, possible that the request would be made to a variety of ND personnel. When such requests become known to any ND personnel, the request should be referred to ORC.

**2.1.2.** Requests for access to Notre Dame faculty, staff and alumni may be subject to other guidelines.

### **2.2. Pre-Review**

In ORC’s initial review to ensure completeness of the application and whether IRB approval is required, they will determine if the research subjects include Notre Dame students. If so, an electronic form routing process will be initiated. See Appendices A and B for narrative and flow chart representations of the process, respectively. The following steps will be taken to initiate the process.

**2.2.1.** ORC assigns the Office of Strategic Planning and Institutional Research (OSPIR) as consultant in eProtocol.

**2.2.2.** OSPIR generates a PDF of selected sections of the eProtocol submission.

### **2.3. Initial Institutional Review**

**2.3.1.** OSPIR staff will check for availability of the population at the requested time, as well as review the methodology and content of the research. OSPIR can send comments to the researcher in eProtocol for clarification as needed. Guidelines for designing research that is more likely to be approved can be found in [Appendix B](#).

**2.3.2.** Upon completion of its review, OSPIR completes a Qualtrics form:

**2.3.2.1.** Summary of the research project

**2.3.2.2.** Summary of methodological or content concerns, if any

**2.3.2.3.** Assessment of the availability of the requested population at the requested time

**2.3.2.4.** Recommendation for disposition, and, if applicable, conditions to be placed on approval

**2.3.3.** OSPIR forwards the form with eProtocol-extracted PDF attachment to the appropriate University administrator. The researcher is notified that the form has been forwarded. The University administrator may consult with OSPIR for additional advice as needed.

#### **2.4. Final Disposition of the Request for Access to a Student Population**

Access to ND student populations will be decided by the appropriate University administrator.

##### **2.4.1.** Definition of the appropriate University administrator

The appropriate University administrator is determined by the type of student population for which access is requested.

- Students defined exclusively as members of an academic unit (college, department, etc.): The corresponding dean (Dean of the Graduate School if the study population is graduate students), program director, or department chair
- Intercollegiate student athletes: The Director of Athletics. The Vice President for Student Affairs will be notified of such requests.
- All other populations: Vice President for Student Affairs and Associate Provost for Undergraduate Studies

**2.4.2.** If the University administrator would like additional information, he or she will notify OSPIR, who in turn will notify the researcher via eProtocol.

##### **2.4.3.** Disposition of request for access

**2.4.3.1.** The appropriate University administrator will indicate on the electronic form whether access to the requested population is approved and under what conditions. The form will also indicate which ND office will provide the contact information.

**2.4.3.2.** Electronic submission of the form by the University administrator automatically forwards the form to the researcher, ORC and OSPIR.

**2.4.3.3.** If the research request is approved, the electronic form includes all of the information needed to serve as the Letter of Agreement. The researcher does not have to attach any additional documentation in eProtocol.

**2.4.3.4.** This approval does not substitute for the separately required approval by Notre Dame's Institutional Review Board (IRB) where applicable.

**2.4.3.5.** If access to the requested population is not approved, the protocol will be not be reviewed any further by IRB.

**2.4.4.** Decisions of the University administrator are final.

#### **2.5. Request for Contact Information**

Upon approval for access to the population, the researcher's next step depends on ORC's determination of the nature of the research.

**2.5.1.** If the research is determined to be exempt from Human Subjects Review by ORC, the completed form authorizes the researcher to work with OSPIR and other offices as needed to arrange contact with the approved student population. The appropriate office for the researcher to work with is indicated on the form as part of the University administrator's approval.

**2.5.2.** If the research is determined to require expedited or full board review by IRB, eProtocol will automatically notify OSPIR of the Board's decision. Approval by IRB authorizes the researcher to work with OSPIR and other offices as described in 2.5.1.

**2.5.3.** The appropriate office (e.g., the Registrar, OSPIR, or Department of Athletics) will supply contact information to the researcher based on the specified criteria.

- 2.5.3.1.** For student researchers and non-ND personnel: The appropriate office will create a Google Gator Group based on email addresses of students selected according to the approved criteria. The student researcher will be made a member of the group. The appropriate office will be the owner of the group and will grant rights to the student researcher to post emails to the group. This arrangement has the following characteristics:
- 2.5.3.1.1. The student researcher can post emails to the group with no one in the group except the manager able to see which email addresses are in the group.
  - 2.5.3.1.2. Students in the group can unsubscribe from the group without revealing their identities to the student researcher.
  - 2.5.3.1.3. Emails to the group constitute the initial invitation and reminders to participate in the study. If applicable, the emails may contain links to open participation (that is, non-individuated URLs) in the study.
  - 2.5.3.1.4. The group does not contain demographic or other identifying information. If such information is needed to conduct the study, it must be collected from participants in such a way that they knowingly and voluntarily provide it to the researcher.
- 2.5.3.2.** For ND faculty researchers: The appropriate office will create a file of contact information and share the file with the researcher via a secure procedure (e.g., Google drive, Box, etc.). The faculty researcher is then responsible for the security of the contact information.
- 2.5.4.** Any release of student information for the purposes of any research on Notre Dame's current students must comport with applicable state and federal laws including, but not limited to, the Family Educational Rights and Privacy Act (FERPA).

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### **3. SCOPE**

#### **3.1. Characteristics of Projects that Require Approval**

These guidelines apply to the following types of projects if they require access to individually identifiable contact information for Notre Dame students that is not otherwise available. Note that they include research which is and is not subject to IRB approval. A partial list of such projects includes the following.

- 3.1.1.** Formal research intended to lead to generalizable knowledge
- 3.1.2.** Class projects
- 3.1.3.** Student theses and honors projects
- 3.1.4.** Studies by student organizations
- 3.1.5.** Studies involving student populations which are deemed by NDRC as "Non-human subjects research" as outlined by the Common Rule

#### **3.2. Characteristics of Projects that Do Not Require Approval**

These guidelines do not apply to the following. Note that exclusion from the scope of these procedures is affected by the type of information or access that the researcher needs in order to solicit participation in the study. Note also that these exclusions include projects for which IRB approval is required.

- 3.2.1.** Institutional research and other university assessment or evaluation projects.

- 3.2.2. Meeting, conferring with, or otherwise accessing students for legitimate educational reasons unrelated to a proposed research project, as permitted under FERPA and under any other applicable federal or state laws or regulations.
- 3.2.3. Access to student records by school officials for the purposes of fulfilling responsibilities for the University.
- 3.2.4. Projects for which subjects are recruited through departmental subject research pools, such as the Psychology Department’s SONA system or the Mendoza Behavioral Lab Research Panel.
- 3.2.5. Projects for which subjects are recruited using referral sampling techniques (e.g. network sampling starting with members of a student club), provided that (a) a University official representing the initial point(s) of contact agrees to such research and (b) soliciting participation does not require the sharing of individually identifiable contact information.
- 3.2.6. Projects for which faculty members choose to include students from their own classes in multi-institutional studies.
- 3.2.7. Projects for which subjects are recruited solely via broadly targeted advertising which invites students to sign up for participation in the study (active opt-in).

**4. DEFINITIONS**

<b>Notre Dame faculty</b>	Notre Dame employees whose current primary appointment is Faculty.
<b>Notre Dame enrolled students</b>	Students currently enrolled, both active and inactive, at the University of Notre Dame or those accepted for admission, and having reached the age of majority.
<b>Investigator or Researcher</b>	A person collecting data to address a question. The data collection may constitute generalizable research or it may be for a limited purpose such as program evaluation, a class project, or needs assessment.
<b>Research</b>	Studies intended to produce information generalizable to other cases or to be disseminated beyond study participants.
<b>Class project</b>	Investigations undertaken in fulfillment of requirements for a specific course, not intended to produce information generalizable to other cases or to be disseminated to audiences beyond the class or internal ND forums (such as an honors thesis colloquium).
<b>Studies by student organizations</b>	Studies undertaken to support the activities and decisions of a Notre Dame student organization, not intended to produce information generalizable to other cases or to be disseminated beyond the student organization and its campus partners.
<b>Referral sampling techniques</b>	Nonprobability sampling strategies that provide access to a target population by contacting either an organization’s leader (network sampling) or individuals known to be members of the target population (snowball sampling). Referral sampling techniques do not require the release of individually identifiable contact information.
<b>Age of majority</b>	Regardless of whether the student is a US citizen or not, the age of majority is eighteen (18) years.

## 5. RESPONSIBILITIES

<b>Responsible Party</b>	<b>List of Responsibilities</b>
<b>University administrator</b>	<ol style="list-style-type: none"><li>1. Render a determination whether a request for access to Notre Dame students is<ol style="list-style-type: none"><li>a. Approved as is</li><li>b. Approved with conditions which may include, but are not limited to<ol style="list-style-type: none"><li>i. A subset of the population requested based on any factors it deems relevant</li><li>ii. A different time frame than that which was requested</li></ol></li><li>c. Not Approved</li></ol></li></ol>
<b>Notre Dame Office of Research Compliance (ORC)</b>	<ol style="list-style-type: none"><li>1. Review submitted protocols to determine whether a proposed investigation requires access to Notre Dame student populations</li><li>2. If such access is proposed, assign the Office of Strategic Planning and Institutional Researcher as consultant in eProtocol.</li></ol>
<b>Office of Strategic Planning and Institutional Research (OSPIR)</b>	<ol style="list-style-type: none"><li>1. Review the protocol.</li><li>2. Complete a Qualtrics form to be forwarded to a University administrator.</li><li>3. Advise University administrators on the soundness of research design and availability of the requested population at the requested time.</li><li>4. Work as needed with the Office of the Registrar to provide requested contact information if the request is approved.</li><li>5. Ensure that minors are excluded from the list of contact information.</li><li>6. Ensure that students who have opted not to allow their contact information to be shared with third parties are excluded from the list of contact information.</li></ol>
<b>Office of the Registrar</b>	<ol style="list-style-type: none"><li>1. Notify Office of Strategic Planning and Institutional Research of all enrolled students' choices regarding release of their contact information (opt-in/opt-out).</li><li>2. Advise on applicability of FERPA regulations</li><li>3. Work as needed with the Office of Strategic Planning and Institutional Research to provide requested contact information if the request is approved.</li><li>4. Work with OSPIR as needed to ensure that minors are excluded from the list of contact information.</li></ol>
<b>Researcher</b>	<ol style="list-style-type: none"><li>1. Complete eProtocol or research proposal accurately and without deception.</li><li>2. Adhere to the disposition of their request.</li><li>3. Adhere to the conditions of the approval, if applicable.</li></ol>

## 6. POLICY ENFORCEMENT

Violations	<p>It is an explicit violation of these guidelines to do any of the following:</p> <ul style="list-style-type: none"><li>• Falsify, either by expression or omission, the purposes or methodology of research when requesting access to Notre Dame students for research purposes.</li><li>• Use alternative means of obtaining contact information for Notre Dame students after having been denied access to do so under these guidelines.</li><li>• Provide contact information for Notre Dame students to other investigators, student organizations, individual students, faculty or any other persons without approval for access under these guidelines.</li></ul>
Enforcement	<p>Any responsible party under these guidelines or its designee will investigate suspected violations, and may recommend disciplinary action in accordance with University codes of conduct, policies, or applicable laws. Sanctions may include one or more of the following:</p> <ul style="list-style-type: none"><li>• suspension or termination of access;</li><li>• disciplinary action up to and including termination of employment;</li><li>• student discipline in accordance with applicable University policy;</li><li>• civil or criminal penalties.</li></ul>
Reporting Violations	<p>Suspected violations of this policy should be reported to Notre Dame Research Compliance; or to the Offices of the Provost, Student Affairs, Community Standards, Strategic Planning and Institutional Research, or the Registrar.</p>

## 7. RELATED DOCUMENTS

*A list of any related documents, including Notre Dame policy documents and any external legal or regulatory documents that provide additional information about the policy. Provide live Web site links to documents where possible.*

<b>Policy or Document</b>	<b>Web Address</b>
Student Population Access Forms	Two versions of the form exists, both in Qualtrics Forms: one for Notre Dame faculty, staff and students and another for non-Notre Dame individuals and organizations. See also <a href="#">Appendix C</a> .
“Guidelines for Proposing Acceptable Research on Notre Dame Students”	These guidelines enumerate the characteristics that the University administrators will expect in an approvable request, as well as some characteristics that are likely to result in non-approval. See also <a href="#">Appendix B</a> .
“How to Request Population Samples”	OSPIR website
“Approvals for Surveys and Focus Groups”	OSPIR website, Office of Research Compliance website

## 8. CONTACTS

*Includes the office or position (not individual name) to contact for policy clarification, along with others who can provide information about the subject matter of the policy.*

<b>Subject</b>	<b>Office or Position</b>	<b>Telephone Number</b>	<b>Office Email or URL</b>
Guidelines Clarification	Director of Research Compliance	(574) 631-1461	compliance@nd.edu
Guidelines Clarification	Office of Strategic Planning and Institutional Research	(574) 631-9472 (574) 631-3549	ospir10@nd.edu
Web Address for this Policy		<a href="http://policy.nd.edu">http://policy.nd.edu</a>	



## **Appendix A: Summary Overview of Procedures Research Access to Notre Dame Students**

### **Introduction**

This document supplements the official procedures guiding the authorization of requests for access to Notre Dame students for research purposes. This narrative version is intended to provide the information in a more readable format. For details, however, refer to the guidelines.

Researchers often seek to conduct investigations using Notre Dame students as subjects. To do so, these researchers, whether Notre Dame personnel or not, typically need some kind of contact information. In determining whether to grant access to that contact information, the University seeks to balance its interest in promoting high quality research with a desire to protect students from inappropriate intrusions into their privacy and from the fatigue that can set in if a population is over-studied.

Both the researcher and the University administrator benefit from a process that is simultaneously efficient and thorough. The key decision points involve understanding the nature of the research, considering the availability of the requested student population at the requested time, and developing mechanisms for providing contact information that honor the rights of students in relation to the role of the researcher. That is to say, some kinds of researchers (primarily Notre Dame faculty) have legitimate reasons to have more detailed access than other kinds of researchers (e.g., Notre Dame students or non-ND personnel).

### **General Outline**

When the University receives a request to use Notre Dame students as research subjects, the Office of Research Compliance (ORC), the Office of Strategic Planning (OSPIR), and the appropriate administrator (defined below) will determine whether access to students is appropriate. If the project is approved and it qualifies as human subjects research according to federal definitions, the Institutional Review Board (IRB) will review the project for compliance with University policies. After a project is approved by the IRB, OSPIR will work with the researcher to supply student contact information.

### **Steps for ND Faculty**

1. Principal Investigator (PI) submits eProtocol.
2. ORC determines if authorization is needed for access to Notre Dame students. Projects that do not need approval include institutional research and other official University business; legitimate educational interactions as permitted under FERPA; subject recruitment through referral sampling, opt-in subject pools (systems through which students have already volunteered to make themselves available for research), or broadly targeted opt-in advertising; and faculty research involving students in their own classes.
3. ORC assigns OSPIR a role in eProtocol that allows an OSPIR staff member to review the protocol and correspond with the PI.

4. OSPIR generates a PDF of selected sections of the eProtocol submission that address:
  - a. Name, position and affiliation of the principal investigator
  - b. Description of the research question and purpose of the study
  - c. Description of the requested population of students, including rationale for their participation and for sample size
  - d. Summary of the data collection methodology, including copies of surveys, interviews, assessments, recruitment and communications materials, consent forms, etc.
  - e. Proposed timing of the study
5. OSPIR reviews the protocol for:
  - a. Soundness of methodology
  - b. Other research activity targeted toward the requested population during the requested time
  - c. Inclusion of topics that are potentially sensitive to the University's reputation
6. OSPIR completes a Qualtrics form. This includes:
  - a. Summary of research project
  - b. Summary of methodological concerns, if any
  - c. Assessment of the availability of the requested population
  - d. Recommendation for disposition (see Step 8), and, if applicable, any conditions to be placed on the approval
7. OSPIR forwards the form to the appropriate University administrator for decision. The student population determines the appropriate administrator (see below). The University administrator may seek clarification from OSPIR.
  - a. Students defined as members of an academic unit: **dean, department chair, etc. of that academic unit**
  - b. Varsity student athletes: **Director of Athletics**
  - c. All other student body subgroups: **VP for Student Affairs and/or Associate Provost for Undergraduate Studies**
8. The University administrator reviews the form and completes the disposition of request section. The decision will be one of the following:
  - a. Approve as is
  - b. Approve with conditions as specified
  - c. Not approve
9. The University administrator electronically signs and forwards the request to the PI, ORC, and OSPIR. The completed form includes all of the information needed to serve as the Letter of Agreement for ORC purposes.
10. If ORC determines that the protocol is exempt from IRB review, the completed form authorizes the PI to work with OSPIR (and other offices if needed) to arrange contact with the approved student population.
11. If ORC determines that the protocol merits expedited or full board review, the completed form signals that the protocol is ready for human subjects review by IRB. If the protocol is approved by IRB, OSPIR will be informed and will work with the PI to arrange contact with the approved student population.
12. The appropriate office will create a file of contact and other relevant information before sharing the file with the researcher via a secure procedure (e.g., Google drive, Box, etc.). The faculty researcher is then responsible for the security of the information.

## **Additional Measures for Researchers Who Are Not ND Faculty**

**Notre Dame Students:** The appropriate office will create and be the owner of a Google Gator Group based on email addresses. The appropriate office will add the student researcher as a member of the group. The student researcher will have posting rights, but will not have access to individual identities or demographics. If such information is needed for the study, it must be collected from participants in such a way that they knowingly and voluntarily provide it to the researcher. Note that the use of listservs for recruiting research subjects is not allowed.

### **Outside Researchers:**

1. Outside Researchers typically receive IRB approval from their home institution.
2. Research proposals should be addressed to ORC. Proposals addressed elsewhere should be forward to ORC.
3. ORC will review the proposal and notify OSPIR by email. Rather than drawing from eProtocol, OSPIR will populate the Qualtrics form with information from whatever materials the PI provides. Correspondence between OSPIR and the PI will take place by email as well. A complete Qualtrics form will be routed to the appropriate administrator. The administrator will review the form as they would normally. When a disposition has been determined, the PI, ORC and OSPIR will be informed. ORC will be kept in the conversation to provide closure to the request.
4. If the request is approved, OSPIR will work with the PI to obtain the requested contact information. The appropriate office will create and be the owner of a Google Gator Group as laid out above for Notre Dame Students.

## Appendix B: Guidelines for Proposing Acceptable Research on Notre Dame Students

### Overall

- The research employs a sound methodological design.
- The research question applies specifically to the student population which is requested.
- The research does not have the potential for adverse reputational impact on the University.
- Keep in mind that authorization for access to Notre Dame students for research purposes is one step in the process. Such authorization does not guarantee IRB approval, grant funding approval or any other authorization.

When the researcher is a student, a number of constraints are likely to be placed on access to Notre Dame student populations for research purposes:

- Only students 18 years of age and older will be included.
- Only students who have allowed their directory information to be made available to third parties will be included. This group is sometimes referred to as the non-opt-out group.
- The researcher will be given special rights to a Google Gator Group with the selected email addresses. The researcher will not be able to see the email addresses, but will be able to post messages (survey invitations and reminders) to the group.
- If conducting survey research, the survey must be designed so that the data returned to the researcher is anonymized, that is, the database has responses to the survey (including responses to demographics questions, if applicable), but not the contact email.
- Study populations may not be limited to single demographic characteristics. For example, a researcher may not request a sample of exclusively women or exclusively Hispanics/Latinos. By extension, even more delimited populations may not be requested, either: for example, Asian American males.
- Certain times of the year will be off-limits for conducting research on ND students. These include, but are not limited to, the first week of each semester, midterms and finals weeks, and times when Course Instructor Feedback (CIF) is being administered.
- In addition to block-outs for certain times in the semester, access to Notre Dame students for research purposes will not be allowed to overlap with major institutional surveys such as Hall Life and the Inclusive Campus Survey.
- In order to accommodate as many requests for student samples as practicable, the norm is to be granted access to a sample from a given population. That sample will be drawn from the non-opt-out students.

### Disclaimer

In most cases, the researcher will be required to clarify the nature of the research auspices to those students who are invited to participate in the study. Sample wording of this clarification is as follows: "This study/survey has been developed by a student (or faculty member) for academic research and is not research intended for nor shared with the University for institutional purposes." This and other points of emphasis, if needed, will be communicated through the Letter of Agreement for the University administrator.

## Appendix C: Routing Form for Research Access to Notre Dame Students

### Part A: Information to be provided by principal investigator in eProtocol

1. Name and position (if student, class level) of the principal investigator
2. Affiliation (department, program, office or organization)
3. Description of the research question and purpose of the study
4. Description of plans for dissemination of the study
5. Description of the particular population of students to be involved in the study
6. Rationale for the use of the requested student population for conducting the research
7. The number of students to be invited to participate in the study and a rationale for that number
8. Summary of the data collection methodology, including copies of surveys, interviews, assessments, etc. to be used in the study
9. Drafts of invitations, cover letters, recruiting communications, and informed consent forms
10. Proposed timing of the study (preferred and acceptable)

### Part B: To be completed by Strategic Planning and Institutional Research

1. Availability of the student population at the requested time
2. Concerns, if any, about sample size and constitution
3. Concerns, if any, about methodology

### Part C (Letter of Agreement): To be completed by University Administrator

1. Indicate whether the request for access to Notre Dame students is
  - a. Approved as is
  - b. Approved for a subset of the population requested based on any factors it deems relevant which may include, but are not limited to, research or assessment activity affecting or involving the same population at the same time
  - c. Deferred for reconsideration pending adjustments to the request
  - d. Not Approved
2. Render a determination whether approved access is granted for
  - a. The time requested
  - b. An alternate time
3. Specify the conditions and limitations of access, if approved