	SOP: Exempt Review by Instructor & Student Exercises			
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1 PURPOSE

- 1.1 Exempt Review Procedures for Research Exercises Conducted as Class Assignments
- 1.2 For research classes, the HREB can empower trained instructors to make Exempt decisions on research protocols submitted by their students.

2 REVISIONS FROM PREVIOUS VERSION

- 2.1 Updated to New Common

3 POLICY

- 3.1 None

4 RESPONSIBILITIES


- 4.1 The HREB Chair will ensure proper training for all faculty who wish to serve as exempt reviewers.
- 4.2 Faculty conducting exempt reviews will correctly apply 45 CFR 46 when completing an HREB review for their students.
- 4.3 HREB will annually audit faculty HREB reviews to ensure consistent compliance for ethical oversight.

5 PROCEDURE

- 5.1 OHRP allows individuals other than the HREB to make Exempt decisions.
- 5.2 Exempt decisions can be made by qualified class instructors teaching courses that involve data collection on projects that qualify for Exempt status as defined in 45CFR46.
- 5.3 To qualify to make Exempt decisions, instructors would need to complete specific training (beyond the standard CITI training) designed by the HREB for this purpose. Training sessions will be offered once a semester and must be renewed every 3 years, or sooner if major changes to Federal Law governing the ethical oversight of human subjects research changes or retraining is deemed appropriate during the annual audit.
- 5.4 Instructors must sign an agreement taking responsibility for the decisions that they are making.
- 5.5 All approved Exempt studies will be reported on the HREB's list of activities at the next official meeting of the HREB (after the chair signs the letters.)
- 5.6 NO expedited or full proposals can be reviewed by instructors. These can only be approved by the HREB as per 45CFR46 and OHRP guidelines. Studies of this nature can be conducted as Research Exercises as described in the Guidelines for Student Research Activities.
- 5.7 Expedited and Full Board Proposals with potential should be sent through the HREB.
- 5.8 NO retroactive review of proposals is possible.
- 5.9 This policy does not apply to any research project that is specifically designed to advance the instructor's own research agenda. All instructors must be careful not to review any proposals that might be construed as a conflict of interest.
- 5.10 This policy does not apply to independent study projects, honor's theses, senior theses, or masters theses/research projects.
- 5.11 Process for submission
 - 5.11.1 Students must submit their proposals through the PACS system.
 - 5.11.2 Instructors will review the proposals and provide feedback using the PACS system. They will complete and submit a checklist for each submitted proposal.
 - 5.11.3 All communication should take place within the PACS system.

6 STUDENT RESEARCH EXERCISES

- 6.1 Instructors still have the option to allow students to collect data as student research exercises. Student research exercises are designed as exercises to learn how to implement research

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methods and statistics techniques and are not meant to be generalized. See the Guidelines for Student Research Activities.

- 6.2 Student research exercises can be disseminated on campus, but not beyond its bounds. So posters based on student research exercises can be posted on campus and students can present at the Student Research Symposium, but not at conferences or meetings held off campus or regional/national conference held on campus directed toward outside constituents.
- 6.3 All student research exercises (that did not receive HREB approval) must be labeled as such on all posters and in all presentations. They must have a label that says: ***This project was conducted as a Student Research Exercise and was not approved by the SUNY New Paltz HREB.***
- 6.4 For Student Research Exercises, no other dissemination is allowed and the data must be destroyed at the conclusion of the class.

7 REFERENCES

- 7.1 [The Revised Common Rule 45 CFR 46](#)