

Do I need IRB Approval for my Online Survey?

The University of Connecticut IRB was established to protect the rights and welfare of human research participants and to ensure that proposed research studies are consistent with the ethical principles of the Belmont report and the protections provided by the regulations and University policies. When reviewing a proposal, the IRB first determines whether the activity involves *research*, as defined by the federal regulations and second, whether it involves *human subjects*.

- **Research** is defined as "a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge" [Federal Policy §45 CFR 46.102(l)].
- **Human subjects** are defined as "living individual(s) about whom an investigator (whether professional or student) conducting research:
 - Obtains information or biospecimens through intervention or **interaction** with the individual, and uses, studies, or analyzes the information or biospecimens; or
 - Obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens [Federal Policy §45 CFR 46.102(e)].

Regarding online surveys, the Federal Office for Human Research Protections (OHRP) considers surveys to constitute an interaction with human subjects because the survey serves as a form of communication in which an investigator asks questions and receives responses.

However, there are certain activities that OHRP has deemed as being "not research" (see the top Q&A in the Definitions section of this [webpage](#)) and there are circumstances in which other activities can be classified as "not research" or "not involving human subjects" and thus not require IRB review.

For example, a quality improvement activity that involves the implementation of evidence-based practice and assessment (which may include surveys) of whether the change in practice has had the desired impact often can be classified as "not research" unless the evidence-based practice has been modified in such a way that you are now evaluating the effectiveness of something new.

The UConn IRB encourages investigators to consult with the IRB (1) whenever there is a question about whether an activity is generalizable research or involves human subjects, and (2) when there are plans to disseminate findings beyond immediate stakeholders. Publishers and conference planners increasingly ask for documentation to support that an activity has IRB approval or a determination that IRB review is not required. The IRB office has developed and made available a **Human Subjects Research (HSR) Determination Form** for this purpose. The form can be found on our [IRB Submissions, Forms & Templates](#) webpage.

General guidelines for online surveys:

- Allow participants to skip any question they do not want to answer.
- For *required* questions, include a "no response" option, so respondents are not forced to answer any question.
- The first page that participants view should be an IRB approved information sheet that incorporates the required elements of consent including: the nature and purpose of the study, study procedures, a statement regarding the voluntary nature of participation, and other

details, as appropriate, including but not limited to:

- What the nature of the questions are;
 - Approximately how long it might take to complete the survey;
 - Whether it is a one-time only survey, or if participants will be contacted again for a follow-up survey;
 - The extent to which privacy and confidentiality of the responses will be collected and maintained. The IRB discourages references to data being anonymous, it is surprising how few data points are needed to identify someone.
<https://www.scientificamerican.com/article/anonymous-data-wont-protect-your-identity/>
- Sensitive data must be protected as it moves along communication pathways between computers. This is ensured by Qualtrics using single sign-on through NetID and encrypted transmission.

Contact information for IRB staff is located here - <https://ovpr.uconn.edu/services/rics/irb/irb-contacts/>.