**CEL and the IRB**

Many CEL activities will be deemed to not be human subjects research (NHSR) or will be eligible for an exemption. Please use the Course application for an initial review to determine if the activity is deemed NHSR, eligible for Exemption, or will need another level of IRB review. The Course Review IRB form will ask you to suggest and defend the determination you think will apply, but the IRB will document the final determination.

No matter what determination is made, it is important that you provide your students with some sort of training that addresses cultural awareness and professional and research ethics before they are immersed in Community Engaged Learning activities.   
CITI training in Human Subjects protection and Responsible Conduct of Research is highly recommended for all CEL courses. [**CITI Research Compliance Courses**](http://www.kenyon.edu/directories/offices-services/office-of-the-provost/conducting-research-at-kenyon/citi-programs-for-research-education/) (ctrl + Click to follow link)

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| **Activities** | **Description** | **Probable IRB**  **Determination** |
| Quality Assurance and Quality Improvement Activities | Data collected with the limited intent of evaluation and improving existing services and programs or for developing new services or programs. There must be no plans to disseminate the knowledge beyond the CEL partner or Kenyon classroom. Example - customer service surveys, | NHSR or Exemption |
| Research on  Organizations | Information gathering about organizations, including information about operations, budgets, etc. from organizational spokespersons or data sources. **Does not include identifiable private information about individual members, employees, or staff of the organization.**  **see list below for examples** | NHSR |
| Research Using Publicly Available Data Sets | Use of publicly available data sets that do not include information that can be used to identify individuals. “Publicly available” is defined as information shared without conditions on use. This may include data sets that require payment of a fee to gain access to the data. | Exemption |
| Community Service  Projects | Donated service or activity that is performed by someone or a group of people solely for the benefit of the public or its institutions.  Example - developing web, internet, data management tools or content for a community partner. | NHSR (but if human subject data are collected during the activity to be used for research protocols, submission to the IRB is required) |
| Behavioral and Social  Sciences Research | Focuses on individual and group behavior, mental processes, or social constructs and usually generates data by means of surveys, interviews, observations, studies of existing records, and experimental designs involving exposure to some type of stimulus or environmental intervention. | Exemption or Expedited review if minimal risk |
| Oral History | Interviews concerning the past that collect and interpret the voices and memories of people as a method of historical documentation and that are preserved by placement in some form of depository or archive for access by other researchers. Research activities must conform to the Principles of Best Practices of the Oral History Association:  <http://www.oralhistory.org/about/principles-and-practices>  The repository may have additional rules/expectations. | NHSR  **Contact:** Digital Initiatives Librarian Jenna Nolt  40-427-5698 or noltj@kenyon.edu  See Also: [Oral History Projects](https://www.kenyon.edu/offices-and-services/office-of-the-provost/grants-fellowships/institutional-research-compliance/institutional-review-board-irb/oral-history-projects/) |
| Journalism | Activities focused on the collection, verification, reporting, and analysis of information or facts on current events, trends, issues or individuals involved in such events or issues. There is no intent to test hypotheses, and activities cannot reasonably be characterized as a systematic  investigation. Research activities should be consistent with the Code of Ethics of the Society of Professional Journalists.  <http://www.spj.org/ethicscode.asp> | NHSR  (but exercise of  professional ethics is expected) |
| Photography - Artistic | If artistic, the IRB does not need to review. However, the State of Ohio requires a written Model Release. See <https://www.ppa.com/files/pdfs/modelreleasewhitepaper.pdf>  **Be sure to keep signed release forms.** | NHSR  (but exercise of  professional ethics is expected) |
| Photography – Use in Research | Using photographs (or audio / video recordings) in research may make it difficult to maintain the confidentiality of human subjects. Consent/release forms should be used.  Permission for being recorded or photographed will normally be included in a consent form. If consent forms are not used, the elements of informed consent must still be presented to the subjects. See Photography – Artistic above | Possibly NHSR or Exemption or  Expedited  (depends on RISKS)  Signed consent for use of photos, audio/visual recordings recommended for all levels |
|  |  | **Continued next page** |
| Documentary Film | Basic ethics of doing no harm, protecting the vulnerable, and honoring the viewer’s trust.  Consent and Release forms required. **Be sure to keep signed forms.** | NHSR |
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Examples of Personally Identifiable Information

* [Full name](https://en.wikipedia.org/wiki/Full_name) (if not common)
* [Home address](https://en.wikipedia.org/wiki/Address_(geography))
* [Email address](https://en.wikipedia.org/wiki/Email_address) (if private from an association/club membership, etc.)
* [National identification number](https://en.wikipedia.org/wiki/National_identification_number)
* [Passport](https://en.wikipedia.org/wiki/Passport) number
* [IP address](https://en.wikipedia.org/wiki/IP_address) (when linked, but not PII by itself in US)
* [Vehicle registration plate](https://en.wikipedia.org/wiki/Vehicle_registration_plate) number
* [Driver's license](https://en.wikipedia.org/wiki/Driver%27s_license) number
* [Face](https://en.wikipedia.org/wiki/Face), [fingerprints](https://en.wikipedia.org/wiki/Fingerprint), or [handwriting](https://en.wikipedia.org/wiki/Handwriting)
* [Credit card numbers](https://en.wikipedia.org/wiki/Credit_card_number)
* [Digital identity](https://en.wikipedia.org/wiki/Digital_identity)
* [Date of birth](https://en.wikipedia.org/wiki/Date_of_birth)
* [Birthplace](https://en.wikipedia.org/wiki/Birthplace)
* [Genetic information](https://en.wikipedia.org/wiki/Genetics)
* [Telephone number](https://en.wikipedia.org/wiki/Telephone_number)
* [Login name](https://en.wikipedia.org/wiki/User_(computing)), screen name, [nickname](https://en.wikipedia.org/wiki/Nickname), or [handle](https://en.wikipedia.org/wiki/Pseudonym)

The following are less often used to distinguish individual identity, because they are traits shared by many people. However, they are potentially PII, because they may be combined with other personal information to identify an individual.

* First or last name, if common
* Country, state, [postcode](https://en.wikipedia.org/wiki/Postcode) or city of residence
* Age, especially if non-specific
* [Gender](https://en.wikipedia.org/wiki/Gender) or race
* Name of the school they attend or workplace
* Grades, salary, or job position
* [Criminal record](https://en.wikipedia.org/wiki/Criminal_record)
* [Web cookie](https://en.wikipedia.org/wiki/Web_cookie)