

II3D GD1 Release of Student Directory Information to External Researchers

Overview

External investigators conducting research in which University of Nevada, Reno (the University) or affiliate faculty, students, staff or physicians are not engaged, but that involve recruitment of members of the University or affiliate communities must obtain approval from the appropriate official responsible for the group to be recruited. Review by the University of Nevada, Reno IRB is not required when the University is not engaged in the research as defined below:

Definitions

Institution

Any public or private entity or agency (including federal, state, and other agencies) (45 CFR 46.102(b))

Employees and Agents of an Institution

Individuals who: (1) act on behalf of the institution; (2) exercise institutional authority or responsibility; or (3) perform institutionally designated activities. "Employees and agents" can include staff, students, contractors, and volunteers, among others, regardless of whether the individual is receiving compensation.

Engagement of an Institution in Research

An institution is considered engaged in a particular non-exempt human subjects research project when its employees or agents for the purposes of the research project obtain: (1) data about the subjects of the research through intervention or interaction with them; (2) identifiable private information about the subjects of the research; or (3) the informed consent of human subjects for the research.

II3D1 Recruitment Requests from External Institutions

Investigators from other institutions, organizations and private businesses may request seek permission to recruit University faculty, students or staff for research purposes. If the University is not considered engaged in the research, the official responsible for protecting the privacy of members of the group being targeted by the research may act as follows:

She or he may

1. inform prospective subjects about the availability of the research;

2. provide prospective subjects with information about the research (which may include a copy of the relevant informed consent document and other materials approved by the external IRB as applicable) but do not obtain subjects' consent for the research or act as representatives of the investigators;
3. provide prospective subjects with information about contacting investigators for information or enrollment; or
4. seek or obtain the prospective subjects' permission for investigators to contact them.

I13D2 Releasing Students' Directory Information for Research

The NSHE privacy policy conforms to FERPA requirements, but considers these as the minimum rather than the maximum (or University-standard) protections.

According to FERPA, names and email addresses are among what is considered "directory information" and as such, are public information. The University records and admissions office applies a more stringent approach than is required by FERPA.

All requests for student information must be evaluated on an individual basis, with consideration for the legitimacy of the reason for the request and what potential harms (if any) may befall students should the information be released. In situations involving research with human subjects, one must consider the level of risk of participation in the research and whether or not the proposed research, including methods for obtaining participant contact information, has been approved by the IRB of the investigator's affiliated institution or agency.

If IRB-approved research poses no greater than minimal risk, information about obtaining subject contact information is adequately described in the application, and safeguards are in place to protect the privacy of potential subjects, students' names and email addresses may be released to researchers for recruitment purposes. Individuals may wish to consult with the University records and admissions office.

Note: If the University or affiliate department has a policy that is more stringent than NSHE's policy, the department's policy should prevail.