

## Human Subjects Policy for those under age 18

According to federal and state law, anyone under the age of 18 is considered a minor. Federal regulations requires that in order for a minor to participate in research, the researcher must acquire parental consent, as well as the minor's assent prior to their participation. What this means for research in the psychology department is that no students under 18 can participate in research unless their parents have provided informed consent. Students under the age of 18 are prohibited from providing informed consent for themselves.

However, minors can take part in educational experiences that are part of a class requirement. The department subject pool was created to enhance undergraduate education about research in psychology. Thus, undergraduates who are minors are permitted to complete studies, but only as long as their data are not used for research purposes. That is, according to Federal OHRP regulation 46.102, without parental consent, minors cannot contribute to "a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge." Thus, studies conducted for educational purposes only do not fit the federal definition of "research," and are therefore not subject to regulation by the OHRP or the University IRB office.

In recognition of the fact that there are a small number of students in the subject pool courses that are under 18 years of age, and that they, like all students, should get research experience as part of their education in psychology, the subject pool committee will institute a new Educational Opportunity Study (EOS) policy. An EOS is any IRB-approved study in the department that students can complete for course credit through the subject pool. The requirements for the EOS are that (1) the procedures may not be stressful, invasive, or highly time-consuming, (2) students are provided with a description of the study before they participate, (3) they receive a thorough debriefing at the end of the study, and (4) their data not be used for research purposes.

Any IRB-approved project is eligible to serve as an EOS, but the subject pool committee will make the final decision about whether a project is suitable for this purpose at the time the short form is reviewed. Experiments that may be particularly stressful, invasive, or time consuming will be exempted by the committee automatically, and investigators may specifically request an exemption on their short form if they so desire, just as current exemptions for handedness, gender, or native language are sometimes granted if there is a compelling rationale. Experimenters are already expected (by default) to run subjects they cannot use to ensure the educational value of research participation is available to all. Researchers are only allowed to impose restrictions by an approved petition of the subject pool committee, and the age exclusion is now part of this policy. For experiments already approved, experimenters who want to exclude running 17 yr. olds as an educational experience should send an email to Jeff Greenberg requesting such an exemption with the experiment number and a brief rationale.

### **Implementation:**

For most experiments, no mention of age should be made in the details of the experimental description, but for those that receive approval for excluding those under 18 years, the "long description" on the web site should indicate that participants need to be at least 18 years of age. Thus 17 year olds could sign up for any study except those that say that participants must be at least 18.

When subjects arrive, they are asked their age, and then designated as an EOS subject as appropriate. EOS subjects do not sign consent forms, but are provided with a description of the study before they participate, receive a thorough debriefing at the end of the study, and their data cannot not be used for research purposes.

EOS standing will be determined by the subject pool committee at the time the short form is reviewed. PIs must request permission from the subject pool committee for an exception from EOS standing. Like the request to use the pool, any EOS exemptions are to be requested by PIs only after they have received IRB approval for their project. Since EOS designation is only relevant to the request to use the department subject pool, it is not included in an IRB proposal. As noted above, EOS standing indicates that a participant can complete the experience for educational, not research, purposes.