NOBTS Institutional Review Board Policy

1. Purpose and Authority The Institutional Review Board (IRB) is established to protect the rights and welfare of human subjects involved in research conducted by faculty, staff, and students of New Orleans Baptist Theological Seminary. The IRB seeks to operate under the best practices informed in the Belmont Report and in compliance with federal regulations, including 45 CFR 46 (Common Rule).

2. Scope of Oversight The IRB reviews research by NOBTS faculty, staff, and students, involving human participants, with a primary focus on:

- Surveys (online and paper-based)
- Interviews and focus groups
- Use of existing datasets with identifiable information
- Counseling and discipleship interventions

3. Definitions

- *Human Subject*: A living individual about whom a researcher obtains data through intervention or interaction, or identifiable private information.
- *Minimal Risk*: The probability and magnitude of harm or discomfort are not greater than those ordinarily encountered in daily life.
- *Exempt Review*: Research activities that pose minimal risk and fit exemption categories.
- *Expedited Review*: Minimal risk research reviewed by at least three members of the IRB.
- *Full Review*: Required for research that presents more than minimal risk.
- *Informed Consent*: The process by which a participant voluntarily confirms willingness to participate after being informed of all relevant aspects.

4. IRB Membership and Structure

- Director of Research Doctoral Program
- Director of Educational Doctoral/Educational Ministry Programs
- Associate Dean of Professional Doctoral Programs or Director of the Doctor of Ministry Program
- IRB Subject Matter Expert
- One rotating member from either the Counseling Division or Christian Education Department

- Conflict of interest must be disclosed and managed

5. Types of Review

- **Exempt**: Anonymous surveys, educational tests, public behavior observations, adult-only participants on non-sensitive topics, and no vulnerable populations.
    - Examples of sensitive topics include: abuse, psychological well-being (depression, PTSD, substance use disorders), sexual behavior and identity, stigmatized or private issues (homelessness, financial hardship, abortion, political beliefs), and risky behavior (criminal behavior or immigration status).
    - Examples of vulnerable populations include: children and youth, people with intellectual or developmental disabilities, elderly with diminished capacity, and those in institutional settings (incarceration). *See Appendix for more information.
- **Expedited**: Non-anonymous surveys, surveys on sensitive topics, interviews, existing data with identifiers
- **Full Review**: Research that may involve emotional distress, deception, collection of identifiable sensitive information, or vulnerable populations

6. Application and Review Process

- Submit IRB application with:
    - Research summary
    - Consent documents
    - Recruitment materials
    - Data storage and security plan
- Review Process:
    - If you are requesting exemption, please consult with your program director (PhD Director, EdD Director, or DMin Director).
    - Review timelines: 2–3 weeks for exempt/expedited; 3-4 weeks for full board
    - Review criteria: Risks minimized, equitable subject selection, informed consent, data protection

7. Informed Consent

- Required unless waived.
- Implied consent allowed for anonymous online surveys (with approved script)
- Written or electronic consent required for interviews and focus groups.
- Templates provided for:
    - Written consent
    - Electronic consent
    - Parental consent and child assent (if applicable)
- Points of Consideration
    - Pastoral Relationships and Power Dynamics
        - Students must take extra care when researching their own congregations or those where they serve in leadership.
        - IRB application should address:
            - Avoiding coercion (participants must feel free to decline without repercussion)
            - Protecting confidentiality within close-knit communities
    - Counseling Relationships and Power Dynamics
        - Students must take extra care when conducting research that involves clients in the counseling agencies in which they are employed.
        - When possible, students should avoid dual relationships in that their current clients cannot participate in their research study. If students have reason to involve their current clients in their research study, they should include this information in their IRB application, along with their plan for managing the dual relationship.
        - Students may enlist participants from the counseling agency from which they are currently employed, provided that the participants are not the students' current clients and they are provided with informed consent and have the option to opt out anonymously.

8. Data Privacy and Confidentiality

- Researchers must:
    - Use password-protected or encrypted files.
    - Store physical data in locked cabinets.
    - Limit access to data.
    - Anonymize or de-identify data when possible.

- If data cannot be anonymized or de-identified, researchers must obtain written consent from participants.

9. Continuing Review and Amendments

- Continuing review not required for most minimal risk studies (unless otherwise stated)
- Submit amendment forms for any changes to protocol, consent, or instruments to IRB.

10. Adverse Events and Noncompliance

- Reportable to the IRB Chair (tiles@nobts.edu) within 5 business days:
  - Breach of confidentiality
  - Adverse participant reaction
  - Protocol deviations
- Noncompliance may result in suspension or termination of study.

11. Training and Education

- Students will receive training and education related to IRB through their doctoral workshops.

12. Recordkeeping

- IRB retains:
  - Applications
  - Consent forms
  - Review decisions and correspondence
- Records stored securely for at least 3 years after study closure

13. Appeals and Complaints

- Investigators may appeal IRB decisions by submitting a written request to the IRB Chair.
- Participants and staff may file complaints through the faculty supervisor or IRB Chair.

IRB Exemption Categories – Quick Reference Guide

This section summarizes when a research study may qualify for an exempt review.

Category 1 – Normal Educational Practices

Circumstances: Research in established educational settings involving regular teaching methods, curricula, or classroom management.

Example: Comparing two different approaches to teaching Bible study in a seminary class.

Category 2 – Educational Tests, Surveys, Interviews, or Observation of Public Behavior

Circumstances: Anonymous or non-sensitive surveys, interviews, or behavioral observations where disclosure would not put participants at risk.

Example: Anonymous congregational survey on worship music preferences.

Note: Sensitive topics (e.g., trauma, abuse, mental health) are not exempt, even if surveyed anonymously.

Category 3 – Benign Behavioral Interventions with Adults

Circumstances: Short, harmless, non-invasive activities with consenting adults, with no significant risk or stress.

Example: Asking small group participants to engage in a brief prayer exercise before filling out a reflection questionnaire.

Category 4 – Secondary Research with Existing Data

Circumstances: Use of existing records or datasets if data are publicly available or fully de-identified.

Example: Analyzing archived church attendance records (with identifiers removed).

Category 5 – Federal Research and Evaluation

Circumstances: Research conducted or supported by a federal agency studying public programs, policies, or services.

Example:Partnering with a federal program to evaluate a community outreach initiative.

Category 6 – Taste and Food Quality Studies

Circumstances: Studies evaluating food quality, taste, or consumer acceptance when foods are safe and approved.

Example: A fellowship meal survey asking participants to rate different potluck dishes.

Important Reminders:

- Research with children, prisoners, or other vulnerable populations rarely qualifies as exempt.
- Sensitive topics (mental health, abuse, sexuality, illegal behavior, etc.) usually require expedited or full IRB review.
- Only the Program Director can grant exempt status — researchers cannot self-exempt.