



IRB Review and Oral History Projects

Guidance for Determining when Oral History Projects Require IRB Review

WSU IRB review and approval, or concurrence of exemption is required for any activity, which in part involve Human Participant Research, regardless of sponsorship or funding prior to initiation.

“The U.S. Office for Human Research Protection (OHRP), part of the Department of Health and Human Services (HHS), working in conjunction with the American Historical Association and the Oral History Association, has determined that oral history interviewing projects in general do not involve the type of research defined by HHS regulations and are therefore excluded from Institutional Review Board oversight”.¹ The following guidance is provided to clarify the circumstances for when oral history projects require IRB review.

Human Participant Research Definition:

Any research project or clinical investigation that involves Human Participant(s) and Research, as defined in the regulations (45 CFR 46), requires IRB review. A project involves a **Human Participant** when the investigator(s) obtains data about a living individual through intervention or interaction with the individual; or obtains an individual's identifiable private information. A project involves **Research** when there is a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to **Generalizable Knowledge**.

Oral History Projects and Generalizable Knowledge:

Oral history is defined by the National Oral History Association as “a method of gathering, preserving and interpreting the voices and memories of people, communities, and participants in past events²”. Projects limited to oral history activities, such as open ended interviews, that only document a specific historical event or the experiences of individuals, and which are not designed to develop or contribute to **Generalizable Knowledge** or generalizable principles in the *scientific* sense, can be excluded from IRB review, per the definition above.

General Principles for Evaluating Oral History Type Activities³:

1. Oral history activities, such as open ended interviews, that **ONLY** document a specific historical event or the experiences of individuals without an intent to draw conclusions or generalize findings would **NOT** constitute "research" as defined by HHS regulations 45 CFR part 46.

¹ Donald A. Ritchie and Linda Shopes, “Oral History Excluded from IRB Review”, *Oral History Association Newsletter*, volume 37, No. 3 (Winter 2003), Available from <http://www.oralhistory.org/wp-content/uploads/2008/10/opoha199.pdf>.

² <http://www.oralhistory.org/about/do-oral-history/>

³ E-mail message from Michael Carome <MCarome@OSOPHS.DHHS.GOV> 12/01/03 9:23 AM to Lori Bross, Assistant to the Vice President for Research – Research Compliance, The Graduate School, Office of Research Compliance, Northern Illinois University, DeKalb, IL

Example: An oral history video recording of interviews with holocaust survivors is created for viewing in the Holocaust Museum. The creation of the video tape does NOT intend to draw conclusions, inform policy, or generalize findings. The sole purpose is to create a historical record of specific personal events and experiences related to the Holocaust and provide a venue for Holocaust survivors to tell their stories.

2. Systematic investigations involving open-ended interviews that are designed to develop or contribute to generalizable knowledge (e.g., designed to draw conclusions, inform policy, or generalize findings) WOULD constitute "research" as defined by HHS regulations at 45 CFR part 46.

Example: An open ended interview of surviving Gulf War veterans to document their experiences and to draw conclusions about their experiences, inform policy, or generalize findings.

3. Oral historians and qualitative investigators may want to create archives for the purpose of providing a resource for others to do research. Since the intent of the archive is to create a repository of information for other investigators to conduct research as defined by 45 CFR part 46, the creation of such an archive WOULD constitute research under 45 CFR part 46.

Example: Open ended interviews are conducted with surviving Negro League Baseball players in order to create an archive for future research. The creation of such an archive would constitute research under 45 CFR part 46 since the intent is to collect data for future research.

WSU Policy and Guidance:

All research that meets the federal definitions of human participant research is subject to the policies and procedures of the HRPP and review by WSU's Institutional Review Board (IRB). Oral history activities conducted by WSU faculty and students are not required to be submitted for WSU IRB review unless such activities constitute "human participant research" as defined by 45 CFR 46. Use the *Human Participant Determination Tool* available on the WSU IRB website or contact the IRB Education Coordinator when unsure if IRB review is required for a project.