

GUIDELINES AND PROCEDURES REGARDING ACCESS TO CMCC STAKEHOLDERS FOR RESEARCH PURPOSES



Introduction

A great deal of research involving members of the CMCC community is conducted at the college. This includes pure research, applied research and quality assurance research. Much of this research is governed by regulations within the CMCC Research Policy Manual, and by regulations and procedures set forth in the Tri-Council Policy Statement on Ethical Conduct for Research Involving Humans (TCPS 2, 2014). CMCC has a Research Ethics Board (REB) that must approve most research.

These guidelines provide the principles and processes for researchers who wish to conduct research directly with various stakeholders of the Canadian Memorial Chiropractic College (CMCC), or to gain access to data about students, staff, faculty, alumni, members, patients, customers and other stakeholder groups held by CMCC. These guidelines have been developed to assist researchers in optimizing participation in their studies, while preventing research study fatigue, protecting confidentiality and student & employee rights, as well as ensuring that research does not conflict with any current or planned research to be conducted by CMCC on an institutional or a divisional level. Furthermore, the guidelines will help to ensure that certain kinds of research will help CMCC to integrate methodologically valid data into institutional planning and decision making, while also ensuring the protection of personal information of stakeholders as research subjects and participants.

Researchers are expected to develop their project proposals having considered these guidelines; and in advance of making formal submissions to the REB or the Office of Institutional Planning. The administration of these guidelines is a shared responsibility between the Office of Institutional Planning and Assessment and the Office of Research Administration.

Scheduling of Research

With a relatively small and unique stakeholder population, there is much demand for engaging various stakeholders as subjects/participants in research. However, CMCC is also required to regularly engage in quality assurance research (e.g. opinion research, stakeholder feedback, customer preferences, customer satisfaction,) and measurement of Key Performance Indicators as required by various policies and legislation.

That said, in determining the timing of their research, researchers must first contact both the Administrative Coordinator, Research, and the Institutional Planning and Assessment Analyst, to ensure that there is no potential for scheduling conflicts or overlap in research projects. Once the timing has been determined, then access will be granted based upon the type of research as described below.

Types of Stakeholder Access for Research

There are four general categories of access for research that involve CMCC stakeholders:

- 1) Research that utilizes data held by CMCC on its employees, students, or alumni;
- 2) Research that involves lab-based participation and data acquisition;

- 3) Research that requires direct access to students and employees, or subsets thereof; and,
- 4) Research that assesses customer feedback and/or preferences.

Based upon each of these categories, various levels of permission for access are required. The following guidelines will assist researchers in determining how to best access stakeholder data, participants, and to determine the necessary levels of permission for approval.

Any research proposals requiring access to CMCC stakeholders (employees, students, alumni, members, patients and customers, etc.) from researchers or organizations that are not members of the CMCC community must also be submitted to the Institutional Planning and Assessment Analyst.

Type 1: Research utilizing data held by CMCC on its stakeholders including faculty, staff and students

Data of this type is maintained in CMCC-owned information systems and databases, and often contains confidential information about students and employees. The data in these repositories are governed not only by CMCC Policy, but also by provincial and federal legislation. Researchers must first discuss their project with the Administrative Coordinator, Research. The Office of Research Administration, can then advise on the required paperwork and permissions.

Access for this type of data may be obtained accordingly:

| Data type | Consenting Authority |
|--|---|
| Student academic records and student demographics (current and alumni) | Registrar |
| Clinical patient records | Dean, Clinics |
| Employee records and employee demographics | Director, Human Resources & Employee Engagement |
| Institutional Quality Assurance Data (satisfaction and engagement surveys, key performance indicators) | Institutional Planning and Assessment Analyst |

Once access is granted, written confirmation of the approval is to be sent to the Institutional Planning and Assessment Analyst, for information.

Type 2: Research involving lab-based participation and data acquisition

Research of this type involves students and employees as voluntary participants. These studies are typically ongoing as part of the institution's overall research plan. While timing may not need to be approved through the Office of Institutional Planning and Assessment, the marketing and promotion of this type of research could overlap with communications relating to other institutional surveys and research projects.

As such, if researchers wish to utilize institutional communications resources (eg. Email announcements, in-class promotions, announcements at student/employee activities and events) to encourage participation, they must consult with the following individuals to discuss a communications plan and timeline:

| Population | Consenting Authority |
|---|---|
| Students ¹² | Registrar |
| Employees | Director, Human Resources & Employee Engagement |
| Patients ² | Dean, Clinics |
| Alumni | AVP, Institutional Advancement & Communications |
| ¹ Where access to students during class time is proposed, secondary consent is required by the Vice-President, Academic (Years I-III and graduate), or the Dean, Clinics (Year IV) | |
| ² Where access to patients who are also registered students or employees, secondary consent may be required by the Registrar or the Director, Human Resources & Employee Engagement. | |

Once a communications plan has been agreed to, written confirmation of the plan is to be sent to the Institutional Planning and Assessment Analyst, for information.

Type 3: Research requiring direct access to CMCC stakeholders including students and employees

Research of this type is such that researchers wish to directly access and target stakeholder populations to promote their study, and/or invite direct participation by stakeholders such as students and/or employees. Direct access can take place using various means, including but not limited to individual email distribution, announcements during class time, during clinical interactions or during student/employee activities and events.

Where access to the stakeholder population is required simply for the indirect promotion (ie. posters, general email announcements) of a research project in which individuals may voluntarily participate

If researchers require direct access to patients, students and/or employees, they must receive permission to do so accordingly:

| Population | Consenting Authority |
|---|---|
| Students ¹ | Registrar |
| Employees | Director, Human Resources & Employee Engagement |
| Patients ² | Dean, Clinics |
| ¹ Where access to students during class time is proposed, secondary consent is required by the Vice-President, Academic (Years I-III and graduate), or the Dean, Clinics (Year IV) | |
| ² Where direct access to patients who are also registered students or employees, secondary consent will be required by the Registrar or the Director, Human Resources & Employee Engagement. | |

Once access is granted, written confirmation of consent is to be sent to the Institutional Planning and Assessment Analyst, for information.

Type 4: Research assessing customer feedback and/or preferences of CMCC stakeholders

Research of this type is usually conducted by CMCC service departments to assess 'customer satisfaction', or by academic departments or student groups to assess 'customer preferences.' They are most often voluntary, focused on a specific sample of a population, and short-term.

Projects of this nature do not generally require specific population access approvals as in some cases the stakeholder data is already available in a particular department. However, where a division or department holds quality assurance data or program-related data relative to a specific population (e.g. Satisfaction with seniors' exercise program in clinic, or student participation rates in peer tutoring) approval for accessing this type of data is required by the executive for that division.

In all such cases however, consultation with the Institutional Planning and Assessment Analyst is required to ensure an integrated institutional approach to this kind of research. Doing so will help to minimize redundancies with existing quality assurance projects and ascertain only methodologically valid data is collected and used for decision making and planning. This consultation shall include support for a research needs assessment, questionnaire design, research methodology validation, research timing, and appropriate analysis of the resulting data. Additionally, this consultation will reveal potential new areas of inquiry in stakeholder satisfaction and engagement.

Documentation Required for Consultation/Access Permission

A letter of permission will be issued by the consenting authority within two weeks' of receiving the complete request from the researcher. Copies of the letter will be sent to the researcher, the Office of Institutional Planning and Assessment and the Office of Research Administration.

It is incumbent upon the researcher to ensure that the associated documentation is included with the submission to the CMCC REB.

Those research projects that require access permission/approval before submission to the REB should submit the following to the consenting authority:

- Study title
- Title and names of authors
- Brief description of the research including objectives and timeline
- Details of sampling methodology for research involving institutional data.
- Description of participants and their recruitment and/or description of data requested.
- Why is this specific stakeholder population required to be sampled?
- Provision of funding for any costs incurred by CMCC in providing access or data.

While the process of ethics review will make certain that the privacy of individual participants will be protected and that appropriate measures for confidentiality and consent are followed, review by the Office of Institutional Planning and Assessment will guarantee that:

- CMCC Stakeholders including students, staff and faculty are not being unduly surveyed or receiving repeated requests for participation in research studies.
- Data is collected for the appropriately assessed needs, and by using appropriate methodologies so that only valid data is used for institutional as well as divisional level decision making and planning.
- Access to potential participants and data can be provided in a way that maintains appropriate confidentiality, and does not result in undue additional workload on administrative/academic units;
- Requests for data protect the confidentiality of students, staff or faculty and are in accordance with the purpose for which the data was initially collected as required by the CMCC Privacy Policy and associated privacy legislation.

- The proposal ensures that applicable laws, contractual requirements and CMCC policies are respected.
- Adequate arrangements have been made to fund any administrative costs incurred in fulfilling researchers' requests.
- The research is timely and appropriate and does not conflict with the plans and priorities of CMCC or its administrative/academic units.
- CMCC is aware of any potential reputational risk or anticipated institutional liability posted by the research or its potential findings.

No access to data or students/faculty/staff will be allowed for commercial purposes. Timeline delays may be recommended to prevent the conflict of commercial research with other research studies which may be underway or with research studies which are being conducted by CMCC.

Key Contacts

| Position | Name | Email |
|--|-------------------------|-----------------------|
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