JHSPH students, in their capacity as students, are not agents or employees of the institution. A student may not serve as principal investigator for human subjects research projects. A student may be involved in human subjects research in one of two ways: 1) as a study team member performing routine staff duties like record keeping, data collection or analysis, or lab work; and 2) as a student investigator who is undertaking a research project in partial fulfillment of the requirements of his or her degree program or for other educational reasons, and has a faculty advisor to supervise the process and take ultimate responsibility for the conduct of the study. In situation 2, the PI must provide to the IRB details about the oversight of the student investigator's activities. In either of these roles, the student has the same compliance training requirements that any other research team member must provide.

In order to ensure that all situation 2 projects that require IRB approval are submitted to the IRB, all student research projects must be submitted to the IRB for a determination as to whether it qualifies as “Not Research” (NR), “Not Human Subjects Research” (NHSR), “Human Subjects Research (HSR) Exempt from IRB Review”, or HSR requiring IRB review. The student and PI may use the IRB guidance flowchart posted on the IRB website (also available from the IRB office) to give them some idea as to what that determination is likely to be, but the determination itself must be made by the IRB. The IRB office will provide the student documentation of its determination.

If a JHSPH student is listed as study team member on a human subjects research application at a different institution, the PI of that protocol and the approving IRB of that institution are responsible for the student's involvement in the research. The JHSPH IRB will not review the human subjects research application because the JHSPH is not “engaged” in the research. Copies of the IRB approval letter, research plan, and any documentation of the student's participation as a researcher should be submitted to the JHSPH Graduate Research and Education Office, and retained in the student file.