

Ethnography Guidance for Institutional Review Boards (IRBs): Considerations for Reviewing Ethnographic Research

What is ethnography and ethnographic research?

Ethnography involves the study of human behavior in the settings where people live and work. It emphasizes the study of people and communities, and aims to describe social contexts, relationships, and processes.¹ Ethnographic research utilizes various qualitative data collection methods including, but not limited to, observation, surveys, and interviews.

Does the study you are reviewing meet the Common Rule definition of human participant research? If yes, does the study meet your institution's threshold for requiring IRB review?

This is an assessment that is often made on a case-by-case basis. When deciding if IRB review and approval are necessary, the first question a researcher should consider is whether the project is considered to be *research* involving *human participants*. Under the Common Rule, research is defined as “systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge.” Human participants are “living individual(s) about whom an investigator conducting research obtains: (1) data through intervention or interaction with the individual; or (2) identifiable private information.”²

Therefore, a study is considered to be research with human participants if it is conducted with the goal of drawing conclusions with general applicability, and if the researcher interacts *with*, designs an intervention *for*, or collects identifiable private information *from*, people.

Some ethnographic research might be considered “[exempt](#)” because it falls into one of the lowest risk categories, but it is important to remember that federal regulations describe a minimal standard, and the policies of your IRB, human research protection program (HRPP), or institution may be more strict.

Due to the unpredictable nature of observing life as it happens, ethnographers might have a difficult time succinctly describing their projects in a study proposal. This guide is designed to help clarify what information researchers should be able to provide, as well as when and where flexibility is necessary or acceptable.

What information should I expect ethnographic researchers to include in the IRB application?

Ethnography is often experiential, exploratory, and may have blurred boundaries between data collection and the researcher's regular activities and communication.^{3,4} Some questions on an

¹ <https://americananthro.org/about/policies/statement-on-ethnography-and-institutional-review-boards/>

² <https://www.hhs.gov/ohrp/regulations-and-policy/regulations/45-cfr-46/index.html>

³ www.gc.cuny.edu/sites/default/files/2021-06/Ethnography-Research-Guidance-11-12-20.pdf

⁴ Arwood, T., & McGough, H., 2007 PRIM&R SBER Conference

IRB application may be more applicable to other types of research, and ethnographic researchers may need to keep plans flexible until they begin data collection.

With that in mind, you may expect ethnographic researchers to include in their IRB applications:

- A description of the methodology they expect to follow in the field. This may include observations, interviews, surveys, and/or other, similar methods.
- Whether it is expected that special permission will be required to collect data. For example, if the proposed study is to be conducted in an office, a letter of permission will be required from the company in whose office the research will be conducted, and a letter of site permission should accompany the application.
- If the proposed study includes plans to collect data internationally, the research staff must adhere to the Office of Human Research Protections' (OHRP) [International Compilation of Human Research Standards](#), in addition to your institution's international research policies, as well as guidelines that exist in the community where data will be collected.
- It may be difficult for ethnographic researchers to predict, expect, or anticipate an exact sample size until they are in the field. This is particularly true of studies which rely on observations. Bearing this in mind, an estimated sample size is acceptable, as long as the estimate is reasonably consistent with the scale of the research they plan to do, and the sites they intend to survey. If it is consistent with the policies of your institution, you may choose to require that the researcher later submit an amendment to request a larger sample size, but also advise that it is better to err on the side of a higher estimate, as a larger sample size without an amendment may constitute noncompliance.
- The study proposal should describe any planned recruiting activities, including, but not limited to, an explanation of how the researcher(s) will introduce themselves to participants and/or the community they plan to study. If the proposed study includes a plan for the researcher(s) to introduce themselves to a larger community (such as a church or community organization), an explanation should be included which describes how and where they plan to do this, as well as a general script for their introduction. Recruitment may be an ongoing process, but it is important that ethnographic researchers have a planned approach and exhibit an understanding of when permissions should (or must) be obtained. If they have a compelling reason for not immediately alerting a community to their presence, make sure they have provided an explanation for why this is the case.
- Ethnographic interviews will often require flexibility and improvisation. However, similar to the process of submitting interview or focus group instruments, it is reasonable to expect that researchers will include the primary questions they intend to ask participants. Though they will likely ask different follow-up questions depending on how the conversation unfolds, researchers should be able to share the general topics they plan to address, as well as the questions they already know they intend to ask. This is

especially important for topics and questions of a sensitive nature to help ensure as accurate a risk assessment as possible.

Does the proposed study require site permission? If so, has the researcher provided documentation that it has been obtained?

As noted earlier, some sites such as school districts or other communities will have strict processes in place that researchers must follow before collecting data. It is the researcher's responsibility to ensure that they have satisfied these site-specific requirements before submitting their protocol. As a reviewer, it is acceptable to request confirmation that such permissions have been obtained.

If behavior is simply being observed, it is important that research staff have an understanding of what is considered public versus private behavior. According to the [Common Rule](#), private behavior "occurs in a context in which an individual can reasonably expect that no observation or recording is taking place, and [that] information that has been provided for specific purposes by an individual...will not be made public (e.g., a meeting among managers and staff at a business or other organization, or an interaction between a health care or social services provider and a patient or client)."

Public behavior refers to behavior taking place in a publicly accessible location in which the subject does not have an expectation of privacy (e.g., a public plaza or park, a street, a building lobby, a government building). If subjects have a reasonable expectation of privacy, both site permission and consent will generally be required. The fact that a researcher, or anyone else, may enter a building without explicit permission does not necessarily mean that it can be considered a public place. For instance, although church staff might not, as a practical matter, typically ask people entering for their names or intentions, members of a particular congregation might reasonably assume that all who enter are doing so to worship rather than to "observe or record".

It is important to note that a site permission letter is not the same thing as a consent form. A site permission letter can be very short, typically just a few sentences, and can be submitted in the form of an email. In some cases, a site permission letter may be required, but not a consent form. This will largely depend on other details of the proposed study, as well as the policies of your institution, IRB, HRPP, and those of the community in which the study is to be conducted.

Does the proposed study require a consent form? If not, is there a plan outlining when informed consent may be sought, and how it will be obtained?

Consent forms are not needed for observations in a public space as long as the observations are recorded in a way that makes it impossible to identify subjects, and the observations would not be likely to place the subject at legal, financial, or reputational risk if they became known. Otherwise, a consent form is required. Most places consider audio and visual recordings to contain personally identifiable information due to the unique nature of voices and faces, even in the absence of overt identifiers. As with other types of research, it is the researchers' responsibility to be aware that laws differ between states and it is important to consider local context when conducting research across state lines.

There is often no direct benefit to participants in ethnographic studies. There may be some risks, such as an invasion of privacy or breach of confidentiality. Reviewers should note whether this is adequately addressed in the consent form.

Depending on the population and cultural context, written consent may not be appropriate for the project. For this purpose, it is often helpful, when applicable, to distinguish between primary subjects and secondary or incidental subjects. For example, if researchers plan to shadow specific subjects about whom they record information of research interest, you may require written consent of those primary subjects. On the other hand, the researcher might not have to obtain written consent from other persons with whom a primary subject interacts during the course of observation. In this context, such other persons would be regarded as secondary or incidental subjects. In any case, researchers should provide a strong rationale in their protocol if another type of consent process (such as verbal consent) is most appropriate for the setting.

Summary

Many ethnographic studies take years, and involve relationships that may change over time. As such, a study proposal should describe how researchers plan to obtain consent in a way that is culturally appropriate, and on a continuing basis.