

Institutional and Federal Compliance Requirements for Research/Teaching

Under Federal Regulations, certain classes of activity require formal review BEFORE they may be undertaken by employees or students of the College. This is true whether or not these regulated activities are funded by external money, whether or not they are performed as part of normal instruction in a classroom, lab, or practicum, whether or not they are performed on the College's grounds, and regardless of whether they are part of a formal research program or simply the result of academic curiosity on the part of a professor or student. Before graduate students can perform the following work for research/teaching, the faculty research advisor must submit a proposal to the appropriate W&M compliance committee(s) and receive written approval.

These classes of work include:

- a) work involving living human subjects (including some survey research or questionnaires);
- b) work that uses or produces radioactive materials;
- c) work that involves the use and care of vertebrate animals; and
- d) work that involves recombinant DNA, or infectious agents, or direct or indirect contact with wild-caught animals that may harbor infectious agents, or any human fluid or tissue.

By law, reviews of work in any of the four categories above must be performed by duly constituted committees appointed by, and reporting to, senior administrators of the College. To enable these reviews, investigators must submit proposals to perform work involving these regulated activities. The proposals must describe the detailed, step-by-step protocols and procedures that will be used in the performance of the work. These protocols must also be updated once each year to permit continuation of the work (annual renewals are not automatic). Additionally, please note that this sort of review is required for some survey work that may be done year-after-year in scheduled classes or laboratories.

Detailed descriptions of the compliance committees, along with guidance for investigators, can be found on the College's Compliance website, located within myWM, <https://my.wm.edu/cp/home/displaylogin>, under the Self Service tab.

W&M policy mandates that those individuals who will perform, or intend to perform, a particular activity involving these regulated areas may not judge for themselves whether that activity is exempt from formal review. Therefore, whenever you have any doubt about whether your work might require review, the correct approaches are either to submit that work through the Protocol and Compliance Management electronic submission program, or to contact a Committee Chair to discuss it.

Every A&S graduate student must provide a Compliance Committee form (not inserted into the thesis or dissertation) submitted to the Office of Graduate Studies and Research with the final original and two copies of the thesis or dissertation. The Compliance Committee form must be signed by the student and the faculty research advisor, certifying that either (1) the research does not involve the above types of research, or (2) the research has been approved by the appropriate W&M compliance committee(s).

If the graduate student's research involves the above types of activities, the final original and two copies of the thesis or dissertation must include a completed Compliance page template.