



DEPARTMENT OF THE ARMY  
DEFENSE LANGUAGE INSTITUTE FOREIGN LANGUAGE CENTER  
PRESIDIO OF MONTEREY  
MONTEREY, CALIFORNIA 93944-5000

ATFL-CMDT

24 November 2018

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Command Policy #14 - Conducting Research Using Human Subjects at the Defense Language Institute Foreign Language Center (DLIFLC)

1. References.

- a. ALARACT 031/2008, Army Human Research Subject Protection Requirements, 141557Z Feb 08.
- b. DoDI 3216.02, Protection of Human Subjects and Adherence to Ethical Standards in DoD-Supported Research, 8 November 2011.
- c. Title 32, Code of Federal Regulations, Part 219, Protection of Human Subjects (current version).
- d. Army Regulation (AR) 70-25, Use of Volunteers as Subjects of Research, 25 January 1990.
- e. DLIFLC Human Research Protection Program (HRPP) Institutional Review Board (IRB). Policies and Procedures for the Protection of Human Subjects Engaged in Research, 28 February 2017.
- f. MEMORANDUM DASG-HRPO, 30 May 2017, subject: Renewal of the Defense Language Institute Foreign Language Center (DLIFLC) and Presidio of Monterey (POM) Assurance for the Protection of Human Subjects (Assurance), DOD A20209.
- g. Draft Department of the Army (DA) Guidance on Exempt Determination Official (EDO) Review of Academic Activities, 22 December 2015.

2. Purpose.

- a. To establish DLIFLC policies, responsibilities, and procedures for the support, coordination, management, accountability, and reporting of all research projects conducted at DLIFLC to ensure that approved research projects are of substantial value, are not duplicative, are properly designed to produce valid results, and that suitable scientific and ethical reviews of all proposed research activities have occurred prior to the involvement of human subjects.

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b. To establish DLIFLC policies, responsibilities, and procedures to ensure that the rights, safety, and welfare of human subjects participating in research are safeguarded and that the research is in compliance with applicable federal and state laws/regulations.

3. Applicability.

a. This policy applies specifically to those research projects that meet the federal regulatory definition of "research involving human subjects" as outlined in 32 C.F.R. § 219.102, where research is defined as "a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge."

b. This policy applies to all DLIFLC personnel and to external researchers who wish to conduct research in foreign language learning, teaching, testing, assessment, and in all other types of research, including those activities and entities that support these activities.

c. Action Research. Action Research (AR) projects are a Quality Improvement/Quality Assurance (QI/QA) type of activities and generally are not subject to this memorandum (Appendix A).

4. Responsibilities.

a. The DLIFLC Human Research Protections Program (HRPP) provides oversight and ensures compliance with federal regulations governing research activities involving human subjects.

b. The DLIFLC Commandant is the designated Institutional Official (IO) and ensures that the HRPP protects the rights, welfare, and safety of all human subjects involved as research participants.

c. The DLIFLC Human Protections Administrator (HPA) is the subject matter expert who manages the HRPP on behalf of the IO (AR 70-25).

d. The DLIFLC HRPP includes two separate committees and a determination function:

(1) The Scientific and Ethics Review Board (SRB) is a special committee appointed by the Provost to provide peer scientific, methodological, and ethical review of all proposed research. All research project proposals (both internal and external) must be reviewed and approved by the SRB.

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(2) The Institutional Review Board (IRB) is an independent committee appointed by the IO (Commandant) to regulate certain research involving human subjects. The IRB provides oversight of all research projects that propose obtaining information from a living individual to ensure that the rights, safety, and welfare of the human subjects are protected.

(3) An Exempt Determination Official (EDO) reviews all research to determine whether the IRB review is required or whether the project is exempt.

(a) Prior to any interaction or involvement with individuals identified as potential participants, and prior to any data collection or other interaction with a human subject involved as a research participant, the research project must have been approved by the IRB or reviewed by EDO and determined that it did not require IRB review.

(b) The IRB ensures that all research at DLIFLC is conducted according to the provisions of the DLIFLC DOD Assurance of Compliance (DOD A20909) granted by the Department of the Army Office of the Surgeon General (DASG) and on file with the Army Human Research Protections Office (AHRPO).

e. Researchers and personnel who conduct, oversee, or supervise a project are responsible for safeguarding the rights, safety, and well-being of subjects, to include work involving human subjects that does not officially constitute research.

f. The SRB and IRB review procedures and exemption determination outlined in this memorandum shall be mandatory for all DLIFLC faculty, staff, students, and for all external researchers.

5. Proponent. The proponent agency for this memorandum is the Office of the Director, Training Analysis, Academic Support. The point of contact for this memorandum is Dr. Michael Kaloydis, Director, Training Analysis at 831-242-3779, or e-mail at Michael.Kaloydis@dliflc.edu.



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Appendix A

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## **Appendix A**

### **Action Research**

#### **1. Definition**

Per Draft Department of the Army (DA) Guidance on Exempt Determination Official (EDO) Review of Academic Activities, "Action Research" (AR) refers to an activity "where actions are taken by the researcher to improve job performance within the scope of workplace norms. The subject of the research is the researcher: the primary purpose is to determine how researcher's actions affect others (secondary subjects). Action Research is NOT considered research involving human subjects but a quality improvement/quality assurance (QI/QA) type of activity.

#### **2. Policy**

Projects that meet the definition of "Action Research" mentioned above shall be approved, administered and conducted under the auspices of the Dean, Director, or Chair of each individual school and/or work unit. For the purposes of this memorandum, AR projects are not considered human subject research and as such are typically not governed by the procedures and policies outlined in this memorandum.

#### **3. Exceptions**

Questions regarding the scope, merit, and definition of AR projects, including issues involving the intent or possibility of publishing and/or presenting AR outside DLIFLC, shall be referred to HRPP.

#### **4. Responsibilities:**

All faculty, staff, and students who conduct, engage in, or are otherwise involved with AR projects are responsible for safeguarding the rights, safety, and well-being of all individuals voluntarily participating as subjects.