NYU Psychology Subject Pool in Summer of 2020

NYU students who register for the following summer 2020 courses, Introduction to psychology, Personality, Social Psychology and Cognition, asked as usual to fulfill a research requirement, even though these courses are all online. They may fulfill the requirement either by analyzing published research articles, or by participating in approved psychological studies.

Because all in-person research studies are suspended until further notice, the students can only fulfill the participation requirement by engaging in online studies. We know that many of the students in the online psychology courses will be residing in places other than the United States. Because some students might be completing these online studies while residing in EU countries that have adopted the General Data Protection Regulations (GDPR), all NYU online studies that offer subject pool research credit must be in compliance with the GDPR.

GDPR provides protections to participants whose data is identifiable that are more strict than are routinely offered to participants who are not covered by the GDPR. For example, under the GDPR, participants whose data is identifiable may request access to their data, or to request that it be deleted at any time. Participants who are covered by the GDPR must be shown a document that describes their rights in detail.

GDPR rules do not apply if the online data is never linked to the data. For this reason, we ask that investigators who ONLY NEED IDENTIFIERS TO ALLOCATE COURSE CREDIT, to use a feature in Sona (the subject pool data base) and Qualtrics (the survey platform provided by NYU) to grant credit for participants directly so that online identifiers are never linked to the data.

Specifically we ask that researchers take the following steps when possible to minimize the impact of GDPR compliance on the research process:

1. Activate the SONA automatic credit-granting mechanism in the Qualtrics survey platform, so that it is not necessary to collect the student’s NetID to grant participation credit. (See sona-systems.com/help/qualtrics.aspx)

2. Activate the Qualtrics Anonymize Response option in the survey termination step, so that IP address, location and other identifying information is not saved with the Qualtrics responses. (See https://www.qualtrics.com/support/survey-platform/survey-module/survey-options/survey-termination/)

3. Make it clear in the study instructions to the respondent that they MUST go to the last question of the survey to be granted research credit, even if this involves skipping through some pages of the survey without answering.
4. Review the survey protocol to be sure that information that is unnecessarily specific is removed. For example, to measure age, it is usually sufficient to ask birth year, or birth year and birth month rather than specific date of birth. If accounting for culture, it is often sufficient to ask about region of ancestry rather than specific countries.

5. Include a question in the survey that asks if the student is responding to the online study while residing in any of the following nations that have adopted the GDPR: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, UK. If the student is NOT in a GDPR-relevant country, it is possible to ask for the NetID to provide a double check on the Sona automatic credit-granting mechanism.

Investigators WHO NEED TO ASK FOR IDENTIFIERS to link multiple waves of data, or to allow subsequent follow-up, must modify their procedures to be compliant with GDPR. In some cases, this can be done by simply informing the EU-residing participants of their GDPR protections, but in other cases it will require modification of the protocol. For example, some special categories of information require specific steps of security and consent. These include questions about political opinion, sexual identity and sexual behavior. See the EUGDPR page in the NYU research web pages (https://www.nyu.edu/research/resources-and-support-offices/getting-started-withyourresearch/human-subjects-research/forms-guidance/EUGDPR.html).

Investigators who cannot anonymize their online study data as described above, will need to prepare an IRB modification describing how they will comply with the GDPR before they will be allowed to recruit from the Psychology Subject Pool.