

The REB at the University of Guelph: Recommendations for a Process in Crisis

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Executive Summary

All research conducted at the University of Guelph (UofG) involving human participants must comply with the principles and articles of the *Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans (TCPS2)*, as well as relevant privacy legislation. At the UofG we have two Research Ethics Boards, the General Research Ethics Board (REB-G) and the Natural, Physical Engineering Sciences Research Ethics Board (REB-NPES) which are responsible for ensuring that research complies with the TCPS2. All research involving human participants, whether funded or not, must be compliant with the TCPS2 guidelines and thus requires approval from either the REB-G or REB-NPES board.

There is widespread concern and frustration at UofG that the REB approval process is not working effectively. Over the past eight months, the REB Working Group¹ has sought to understand why the process is not working for users and to propose strategies to improve the situation. We consulted widely. We conducted a survey of members of the research community who use the UofG REBs (n= 256). We also conducted interviews and focus groups with relevant stakeholders and key informants including members of the REBs, REB staff and other staff in the Office of Research, managers of REBs at other Ontario universities, and members of UofG administration (at College and University levels).

We found that the REB process has reached a *crisis-point* – both the research and teaching missions at UofG are being compromised by an untenable ethics process. Students are not receiving the research training or the experiential learning opportunities that they otherwise would, and many research activities are being delayed, altered, or avoided. We outline ten recommendations to address the challenges facing the REB. They are interlinked and no one recommendation stands alone. It is clear, however, that the REB process requires *simplification*. Frustrations with the current REB process relate to both its *speed* (it is too slow) and its *substance* (lengthy and complex form, feedback and direction to researchers). While there are excellent *people* involved with the REB, the *process* is unnecessarily complex and under-resourced. In particular, the Research Ethics Board Office is understaffed. Our summary here of recommendations to address the crisis in process aligns with the more detailed description of these recommendations in Section 3. Supporting improvements to the REB process at UofG is an essential component of supporting ongoing growth in research excellence.

We want to stress that the campus community values the service provided by the REB, appreciates the hard work performed by REB staff, board members and Chairs, and recognizes the importance of ethical review. We also recognize that REB Office staff and REB members are highly and passionately committed to their work. It is the REB *process* at UofG that has led to concerns. We all – researchers, REB members and staff, university leaders – have a role to play in supporting the process changes that are necessary.

¹ The REB Working Group is an ad-hoc group that was assembled by invitation of Karina McInnis, Associate Vice-President (Research Services), and included four faculty members: Noella Gray (Geography, Environment and Geomatics), Jamie Burr (Human Health & Nutritional Sciences), Tad McIlwraith (Sociology & Anthropology), and Lori Ann Vallis (Human Health & Nutritional Sciences).

Primary Recommendations

First and foremost, we propose a need for new REB service goals – instead of the current 6-8 week goal for initial feedback on REB applications, we propose a goal of 3 weeks for initial feedback on delegated reviews and 4 weeks for feedback on protocols requiring a full board review. These service goals are reasonable and consistent with REBs at other Ontario universities. We expect the recommendations listed below, if implemented fully, would significantly improve the REB process and help to enable these goals to be reached.

- Hire more permanent, full-time (PFT) REB staff ([Section 3.1](#), below)
 - Specifically, one additional PFT coordinator position is required to support the full suite of recommendations detailed in this report
 - The number of new REB applications and amendments has increased substantially since 2009. This is a positive reflection of the growth in human participant research being conducted at UofG, which needs to be adequately supported.
 - Since 2018, one coordinator position was converted from a contract position to a regular full-time position. While this is helpful for retention of appropriately skilled staff, it did not increase the number of staff in the office.
 - The REB office is currently facing systemic risk, given the context of unmanageable workload and staff burnout. The sudden resignation of even *one* staff member would exacerbate challenges so dramatically that all human participant research at UofG would be severely impacted for a significant period. (For example, one staff member went on short-term leave in December 2022 and an announcement about delayed REB responses times was sent to ADRs and College Research Managers on December 7, 2022.)
- Ensure REB positions are always filled and provide more support for REB members ([Section 3.2](#)). This could include:
 - Revising the REB appointment process
 - Providing more incentive and/or recognition for faculty who serve on the REB
 - Providing more training to REB members regarding consistent and appropriate feedback
- Empower REB staff to complete delegated reviews of minimal risk research ([Section 3.3](#))
 - Rather than the current process for reviewing minimal risk protocols (review by 1 coordinator (staff member), 1 REB member (2 members on occasion), the REB Manager, and a (Co-)Chair), we propose review by one coordinator (a qualified Ethics Office staff member) and the Co-/Chair of the REB, with oversight by the REB manager.
 - This is how minimal risk protocols are handled by some other REBs in Canada and it is permitted under [Articles 6.4](#) and [6.12](#) of the TCPS2.
 - **This recommendation is only possible if an additional REB coordinator, with the appropriate skills and qualifications, is hired.**
- Develop an Electronic Submission System with input from REB staff, REB board members, and researchers ([Section 3.4](#))

- The application process must be re-designed at the same time ([Section 3.5](#)). Simply transferring the current form into an online system will be ineffective (and was tried in the past). A new, but poorly designed, electronic system would increase challenges and frustrations, rather than mitigate the current issues.
- System design requires input of all user groups including researchers, REB staff, and REB members.
- Ideally, an electronic system would include a repository of previously approved protocols and related documents (SOPs, CORE certificates, etc.), to be easily accessible and referenced in new applications ([Section 3.6](#)).
- Develop a simpler REB Application Form ([Section 3.5](#))
 - The current form is too long, too complicated, and redundant in places which, in turn, leads “...researchers to fail in predictable ways”, as one REB board member stated.

Secondary Recommendations

We expect that the secondary recommendations, if coupled with primary recommendations above, will also help to improve the REB process.

- Improve communication between researchers and the REB Office ([Section 3.8](#))
- Develop an online repository of SOPs, certificates, and previously approved protocols ([Section 3.6](#)), ideally integrated with a new electronic submission system ([Section 3.4](#))
- Develop new templates/examples of approved language for consent forms, simplified from current lengthy documents ([Section 3.7](#)).
- Empower any interested department(s) to create departmental Research Ethics Committees (RECs). These RECs could oversee course-based research activities (per [Article 6.12 of the TCPS2](#)) ([Section 3.9](#)).
- Tailor the REB application form and review process to better fit the different kinds of research reviewed by the REB. This tailoring would pertain to level of risk, methodology, type of participant, etc. For example, a ‘re-think’ of the review process as it relates to SoTL, community-based research, and research with Indigenous communities would be helpful, but would require that other recommendations be implemented first or concurrently ([Section 3.10](#)).

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1.0 Introduction and Report Overview

All research conducted at the University of Guelph (UofG) involving human participants must comply with the principles and articles of the *Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans* (TCPS2), as well as relevant privacy legislation.² At UofG we have two Research Ethics Boards, the General Research Ethics Board (REB-G) and the Natural, Physical Engineering Sciences Research Ethics Board (REB-NPES). Together, these two boards are responsible for ensuring that research is conducted according to ethical principles. Indeed, all research involving human participants, whether funded or not, must be compliant with the TCPS2 guidelines and thus the research requires approval from either the REB-G board or REB-NPES board. Of note, a commitment to the ethical conduct of research is not just mandated, it is a widely shared value among members of the UofG research community.

Despite these mandates, there is widespread concern and frustration at UofG that the REB approval process is not working effectively. Why not, and what can be done to improve these processes? Over the past six months, the REB Working Group has sought to answer these questions. We consulted widely, via a survey of members of the research community who use the UofG REB (n= 256; Appendix 1). We also conducted interviews and focus groups with stakeholders and key informants. These stakeholders included members of the REB, REB staff and other staff in the Office of Research, managers of REBs at other Ontario universities, and members of UofG administration.³

What did we find?

- The REB process has reached a *crisis-point* – both the research and teaching missions at UofG are being compromised. Students are not receiving the research training and experiential learning opportunities that they otherwise would and many research activities are being delayed, altered, or avoided.
- There are multiple possible strategies to address the challenges facing the REB. They are interlinked – no single recommendation alone will address all challenges – and they require investment and support from a range of stakeholders across campus. Overall, the REB process requires *simplification*.
- Although there are excellent *people* involved with the REB (researchers, staff, REB members), the *process* is unnecessarily complex and under-resourced. In particular, the Ethics Office is understaffed.
- Frustrations with the current REB process relate to both *speed* (it is too slow) and *substance* (feedback to researchers, details below in [Section 2.3.4](#)).

The remainder of this report elaborates on these key findings. The Executive Summary, above, aligns with the discussion in Section 2 and recommendations in Section 3. Section 2 summarizes the challenges associated with the current REB process at UofG, illustrating the specific frustrations related to the speed and substance of the REB process. Section 3 elaborates on the recommendations, identifying the ways in which they will facilitate the simplification of the

² Available at: https://ethics.gc.ca/eng/policy-politique_tcps2-eptc2_2018.html

³ Throughout the document, quotations are used to illustrate key points. The majority of these quotations come from the survey, while a few come from interviews or focus groups.

REB process. Section 3 builds on the recommendations listed in the Executive Summary and is summarized in Table 1 (p. 30). Two graphics are included to show the changes to process. Figure 2 identifies specific bottlenecks and challenges in the current REB process and Figure 3 shows where these bottlenecks and challenges might be overcome if our proposed recommendations are implemented. [Appendix 1](#) includes the survey questions and [Appendix 2](#) includes a summary of data collected in the survey.

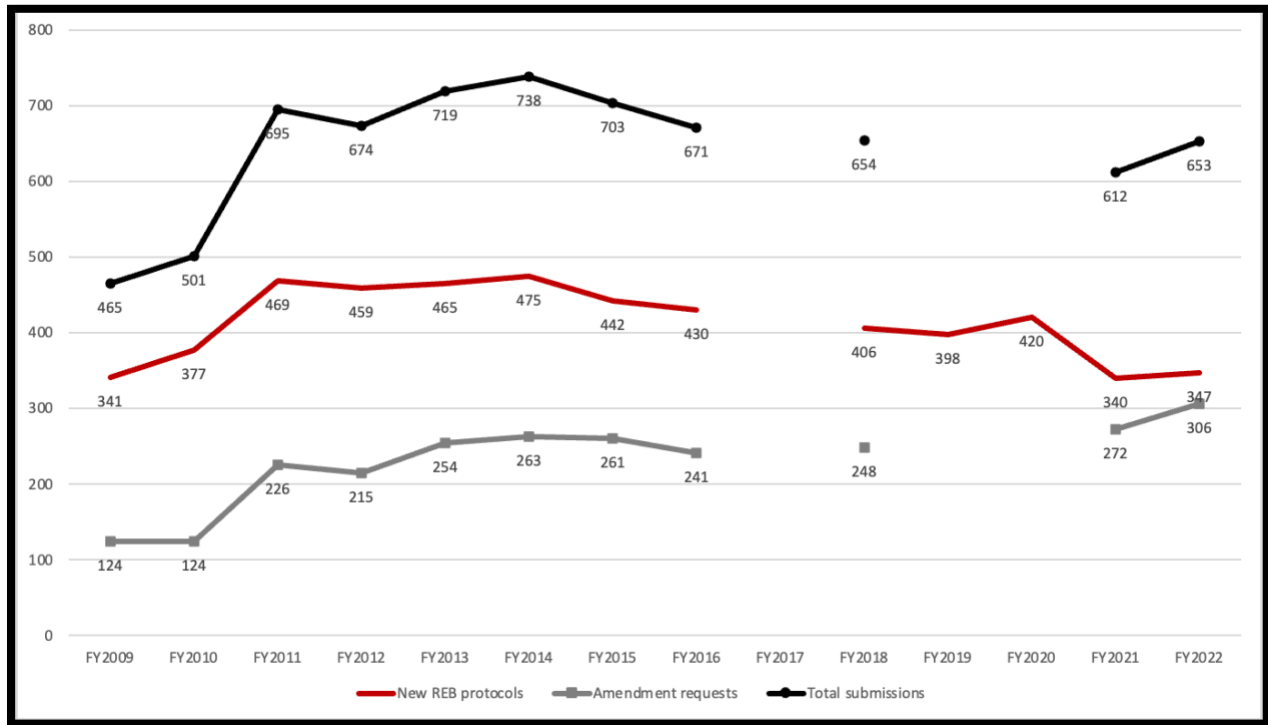
2.0 Challenges in the Current REB Process

Before reviewing challenges and problems, it is important to note that throughout this review process it was repeatedly stated that the campus community values the service provided by the REB, appreciates the hard work performed by REB staff and board members, and recognizes the importance of ethical review. We also recognize that Ethics Office staff and REB members are highly and passionately committed to their work. It is the REB *process* at UofG – the specific forms, timelines, and tendencies – that have led to concerns. In short, it is frustration with the system rather than individuals. As one survey respondent put it, *“I have always received courteous service/responses from the REB office... Please don't lose what is working well, as you work to fix what isn't.”*

2.1 Context for Challenges

- The number of total submissions to both of the University of Guelph’s Research Ethics Boards has increased 40% over the past decade, from 465 submissions in the 2009 fiscal year to 653 submissions in the 2022 fiscal year (Figure 1). Of these submissions, the number of amendments submitted has more than doubled in the same period (from 124 to 306). This is a positive reflection of the growth in human participant research being conducted at U of G – and is exactly what is expected of a research-intensive university. This research activity needs to be adequately supported.
- Given this increase in submissions, the workload for REB staff and members has increased significantly in recent years. Staff and board members are burnt out, there has been little changeover in board members, and there are several vacancies on both the G and NPES boards as it is challenging to recruit new board members due to a general increase in workload across campus. As of September 2022, there will be 8 faculty vacancies on the REB-G (5 regular members and 3 alternate members) and 2 faculty vacancies on the REB-NPES (both alternate members).
- Adjusting to research during the COVID pandemic created additional delays and challenges. However, since the initial disruption of the pandemic, REB review timelines have returned to pre-pandemic norms at other institutions (i.e. ~3 weeks for initial review of minimal risk protocols), but have remained much longer than this at UofG. In addition, many of the challenges related to the REB process at UofG were present before COVID, as detailed in an external review of the Office of Research Services in 2018.

Figure 1: New REB Protocols, Amendment Requests, and Total Submissions (2009-2022).



Note: Data provided by the Research Services Office. Some data are missing (related in part to the adoption of Research Link electronic software in 2016-17).

2.2 Crisis-Point

While concerns regarding the UofG REB process have been mounting over time, we have reached a crisis-point where the negative impacts on both research and teaching are significant. Indeed, the university’s reputation in these areas may be compromised by this crisis (this concern was voiced by multiple survey respondents). Two of the core principles of the University’s [Strategic Research Plan](#)⁴ – promoting research excellence and building a supportive research environment – are undermined by current challenges with the REB. Similarly, opportunities for [experiential learning](#) focused on course-based or community-engaged research are increasingly limited because of challenges associated with the REB process; this constrains the University’s ability to advance experiential learning per its [Strategic Framework](#).⁵ Given UofG’s emphasis on both research excellence and experiential learning, this crisis must be addressed.

⁴ Our Research Vision: Strategic Research Plan, University of Guelph, 2017-2022. Available at: <https://www.uoguelph.ca/research/system/files/UofG%20OOR%20Strategic%20Research%20Plan%20-%20202017-22.pdf>

⁵ The UofG Strategic Framework, *Our Path Forward*, is available here: <https://live-chug.pantheonsite.io/sites/default/files/2022-03/strategic-framework-2020.pdf>. Experiential Learning categories, including ‘Research and Scholarly Creation Courses,’ are outlined here: <https://www.uoguelph.ca/experientiallearning/about-el/el-definition-and-criteria/curricular-experiential-learning-categories-and-criteria>

Many researchers are altering their research plans because of delays and frustrations with the REB; 76% of survey respondents indicated they had done so (n=176). The most frequently reported negative impacts on research included:

- not conducting a particular research project (43%);
- deciding against involving human participants in a project (26%);
- advising a graduate student to avoid thesis research involving human participants (26%);
- asking a collaborator at another institution to submit an application to their REB instead of submitting at UofG (20%) or asking a colleague at a different Institution to take on the PI role on collaborative grant due to challenges with REB submissions at UofG (10%);
- and/or deciding not to submit a grant application (9%).

“I have avoided running some studies because I knew that I wouldn’t get REB approval in a usable timeline.”

“Where I’ve seen the REB process create hardship for researchers is linked to the length of time to move through the review process... e.g. when unexpected opportunities for data collection pop up and there is not enough time to move through the process so data collection has to be delayed or cancelled.”

The challenges faced by the complex and slow REB process are impacting teaching as well. For graduate students whose programs emphasize training in human participant research, it is particularly concerning that they are being advised to avoid human participant research, or to avoid learning methods or techniques, or to undertake different research projects solely because of challenges they would face with getting REB approval in a timely fashion.

“The REB process is such a substantial barrier to research that I regularly discourage master’s students from collecting primary data. Within a 2-year degree, there’s no time to use an entire semester going back and forth with the REB.”

“My department’s faculty members routinely steer graduate students away from this important [social science] methodology because the approvals process is perceived to be unreasonably time-consuming and onerous.”

Furthermore, for an institution that emphasizes experiential learning, there is concern that opportunities for undergraduate students to engage in human participant research are diminishing.

“I have stopped conducting classroom research because the REB requirements for this have become ridiculously onerous since I have been here.”

“Our students are disadvantaged due to these constraints compared to students at other Canadian institutions who can gain practical experience running a user study due to more light-weight REB processes related to computing-related studies.”

“[The REB process] has increasingly discouraged me from recommending that undergrads conduct their own research. In my discipline undergraduate students conducting their own research is common and puts our students at a disadvantage if they cannot do this before applying to graduate school.”

Both the research and teaching missions of the university are compromised if the REB is not functioning efficiently and effectively.

2.3 Challenges

Researchers who use the REB identified two main concerns that have given rise to this crisis-point: *speed* and *substance*. ‘Speed’ refers to the prolonged review timeline and delays in receiving REB approval. ‘Substance’ is more complex, referring to challenges related to the application form, the feedback researchers receive from the REB, and other qualitative aspects of the review process. These challenges are illustrated in Figure 2 and discussed in further detail below. While Figure 2 illustrates the challenges in relation to the review process for minimal risk research, they also apply to applications that go to full board review.

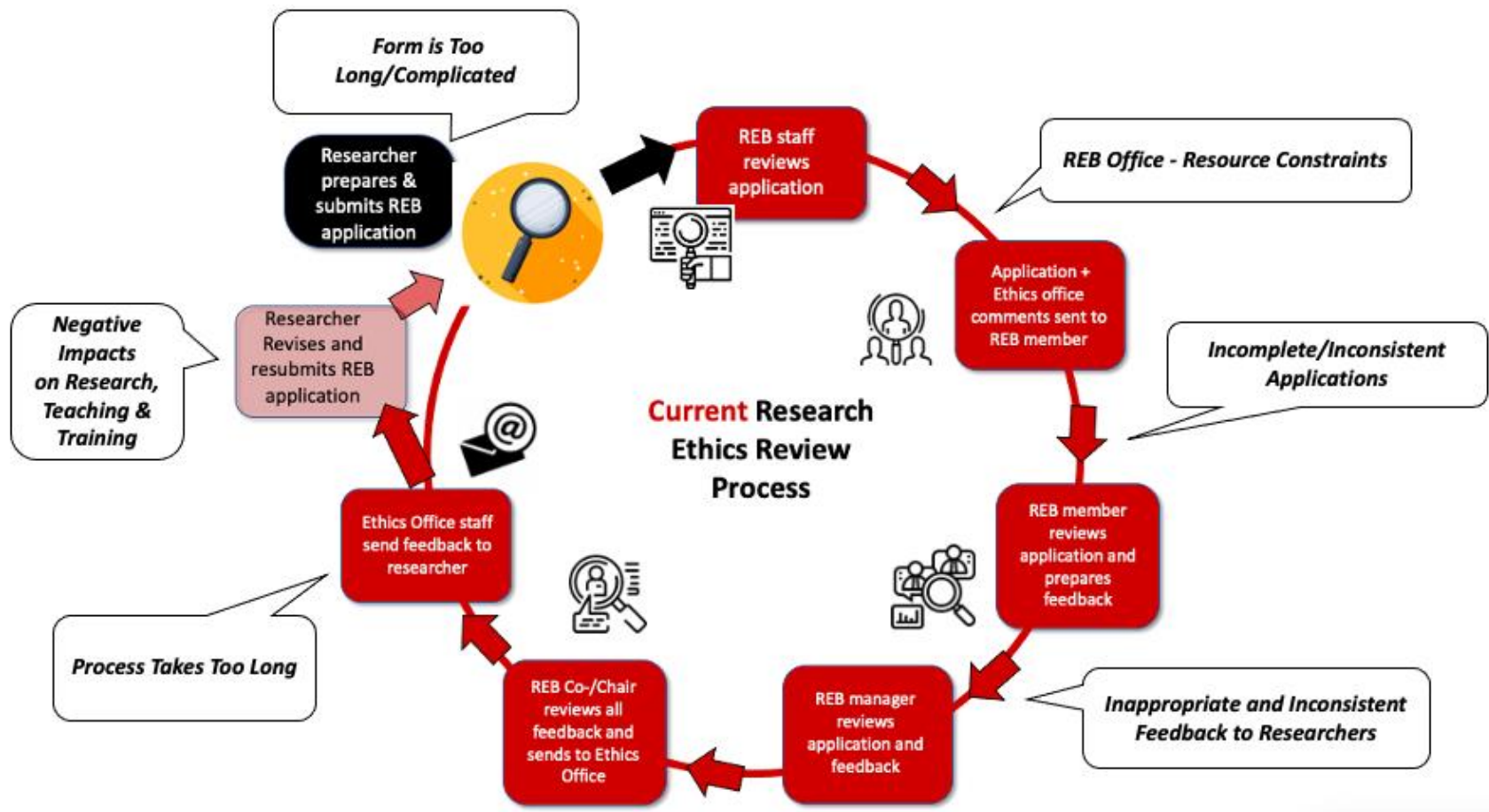


Figure 2: Challenges Throughout the Current REB Review Process

2.3.1 Lengthy Timelines and Delays

The REB website indicates that it should take approximately 4-6 weeks for researchers to receive initial feedback on their REB applications.⁶ Of 173 survey respondents, 27% indicated that in their experience the process was ‘longer than expected’, and 38% indicated it was ‘much longer than expected’.

For researchers, the unpredictability of the timeline for review and approval can hinder their ability to complete research according to funding schedules, to collaborate in multi-institutional projects, or to fulfill obligations to community partners. This also creates reputational risks with colleagues, funders, community partners and others.

“Our requirements differ from some US universities - they get approval, we don't (without extensive additional requirements) and because we are so slow, we aren't able to participate in multi-university projects.”

While all REBs experienced delays and prolonged review times with the onset of the pandemic, REBs at other universities have since been able to resume ‘regular’ review times. For example, at the University of Waterloo minimal risk protocols are currently reviewed within 2-3 weeks, while at the University of Toronto 2-4 weeks is typical.

“...the REB process... is taking way too long, typically 6-8 weeks. I think REB needs a lot more reviewers in order to shorten the processing time. The REB process should not take more than 2 weeks. Period.”

“I don't have any issues with the REB process itself. It is more the speed that it takes to get it back to me. Colleagues at other Universities turnaround in 2 weeks.”

For students, the lengthy approval timeline hinders their ability to gain research experience and to complete their degrees in a timely fashion. It can cause them to be unable to complete their research and writing within their guaranteed funding period.

“For graduate students, the 4-6 week initial approval process is also onerous and can introduce significant delays, say in a 2 year Master's degree, especially when the rounds of feedback and approval can make the process drag on for 2+ months.”

“I was very disappointed when a graduate student I was advising wanted to interview human subjects in a very low-risk manner, and was forced to abandon that line of research since the REB process took so long that it would have forced her to register for an additional semester in order to complete the research.”

2.3.2 REB Application Form is Too Long and Too Complicated

⁶ Although the website indicates 4-6 weeks, researchers currently receive a response from the REB when they submit an application indicating that initial feedback will take 6-8 weeks.

The current REB application form is 46-pages in length *even before it has been filled in*. As such, the form is excessively and unnecessarily long. (For comparison, until they switched to an electronic system in 2017, the University of Toronto REB had a 10-page application form). Not only does it take a significant amount of time to complete this form (for researchers) and review this form (for REB staff and members), but it also leads to challenges in maintaining consistency and coherence across the document. As one REB board member said:

“Researchers fail with the form in predictable ways.”

This REB member was referring to the consistent pattern in mistakes and inconsistencies that they see in applications, which are partially a result of the structure and length of the application form.

Researchers share this frustration with the application form.

“Our [REB] application is huge and vague. Some sections duplicate... and it is designed to gather much more information than is actually required. In addition, the layout of the document disperses similar and duplicate information throughout, making it difficult to edit and keep consistent.”

The length and complexity of the form is unnecessary; other Canadian institutions who must also comply with the TCPS2 have much shorter, simpler forms.

*“A *blank* form at Guelph is a whopping 46 pages long, whereas all the other forms I can find were less than half of that length: Ottawa (19 pages), Carleton (11 pages), Queens (20 pages), Manitoba (19 pages). Many institutions appear to use an online system to streamline the process (e.g., U of T, Waterloo, McMaster, Western, Alberta). The Universities of Regina & Saskatchewan have a joint document that boils it down to only 7 pages, and McGill University starts at only 3 pages! So Guelph’s 46-page monstrosity is clearly an outlier, and can be shortened considerably... Right now, the massive REB form adds to researchers’ workloads, the REB response time, and to the burnout experienced by many REB members.”*

Moreover, when asked whether the materials required as part of the initial REB application are limited to only what is needed to ensure the ethical conduct of research, 49% of respondents disagreed or strongly disagreed.

“I think the REB documents required for the Guelph REB (compared to my experience at 2 other institutions) are far greater than what is needed to ensure ethical conduct of the research. In fact, it almost creates motivations for researchers to try to go around REB policies to ensure that they can keep their research going.”

There is a widely held perception that the length and complexity of the current form, as well as the length and complexity of consent documents (see [Section 2.3.5](#)), is the result of an effort to protect the university, rather than research participants. Whether or not this is the case, this perception serves to undermine researchers’ trust in the process.

“I do not know whether or not the REB processes are intended to limit liability. It's a common belief however, and it might be a good idea for the REB to address that assumption.”

Addressing this assumption could be accomplished through revising and simplifying the application form (see [Section 3.5](#)) as well as by providing templates for simplified language for consent documents (see [Section 3.7](#)).

2.3.3 REB Office Insufficiently Supported

Given the crisis-point that the REB has reached, the REB office is currently in a state of crisis management. Whereas the office would, ideally, have capacity to provide regular training and feedback for REB members and workshops/orientations for researchers (especially graduate students and new faculty), there is currently no capacity for these crucial activities. More importantly, the limited number of staff in the Ethics Office points to a capacity issue, which is a significant and major contributing factor to the lengthy review timeline.

The mismatch between the needs of the research community and the capacity of the Ethics Office was widely noted during our consultations.

“I think the REB members and the review and approval process does facilitate the conduction of ethically sound research. However, I think the staffing is inadequate (i.e., we have placed them in an impossible situation) compared to the work demands... The workload is unreasonable for them.”

As a service-provision unit, the REB does not currently have the capacity to provide the level and timeliness of service required to adequately support human participant research at UofG.

2.3.4 Inappropriate and Inconsistent Feedback

One of the main concerns described by survey respondents related to overreach or ‘mandate drift’ that appeared in the feedback received about their protocols. This is the sense that REB reviewers often request changes that go beyond ethical concerns, or that are unreasonable or unnecessary, given the minimal risks involved.

“Often I get feedback that demonstrates what I have called "mandate drift" where REB members comment on method, methodology or content that I deem to be outside the scope of ethics. Some members confuse their judgements about how a given project should be conducted with what according to the guidelines, falls within the purview of ethical conduct of research. Here disciplinary bias and reviewers' own (taken for granted or stated) commitments to questions of how we know and what reality is trump the policy.”

When asked whether the feedback that they received from the REB on their initial application(s) identified only those changes that were necessary for research to comply with the principles of

the TCPS2, 56% of respondents disagreed or strongly disagreed. Furthermore, 42% of respondents disagreed or strongly disagreed that the REB process at the University of Guelph facilitates the progress of ethical research.

Overall, many respondents' concerns could be summarized as a perceived failure of the REB to adopt a proportionate approach to REB review. Per [Chapter 1](#) of the TCPS2:

This Policy aims to strike an appropriate balance between recognition of the potential benefits of research, and protection of participants from research-related harms, including injustices and breaches of Respect for Persons. Given that research involving humans spans the full spectrum of risk, from minimal to substantial, a crucial element of REB review is to ensure that the level of scrutiny of a research project is determined by the level of risk it poses to participants ([Article 6.12](#)). A reduced level of scrutiny applied to a research project assessed as minimal risk does not imply a lower level of adherence to the core principles. Rather, the intention is to ensure adequate protection of participants is maintained while reducing unnecessary impediments to, and facilitating the progress of, ethical research. This approach is in keeping with the need to respect academic freedom and not to place unwarranted constraints upon it.

Many respondents indicated that they found the REB review process to create impediments to and constraints on their research; in other words, the current process is not proportionate.

“The REB often recommends revisions beyond its scope, such as those pertaining to methodological or analytic decisions. Similarly, the requirements are often non-nonsensical or defy logic, such as the requirements routinely imposed on anonymous online surveys.”

“There are many REB comments that do not pertain to the terms of the TCPS2. I have had to delve into statements from the tri-council ethics board to prove to the REB members that they are overstepping. They seem focused on protecting participants from research, not from harm. We should aim to minimize risk of harm, rather than going to extremes to try to avoid it. This is especially true for survey-based research - particularly anonymous surveys. The risk to participants is exceedingly low for most studies, but the full REB process is brought to bear.”

Related to over-reach or ‘mandate drift’ were concerns regarding the inappropriateness of the feedback for the proposed research. While researchers understood that reviewers were trying to offer feedback regarding legitimate ethical concerns (i.e., feedback that would be appropriate and consistent with the TCPS2), a lack of familiarity with the research methods/tools/approach meant that some researchers found that REB feedback did not in fact address ethical concerns in a meaningful or appropriate way.

“When I propose online studies using [X], much of the feedback is not relevant because of a misunderstanding of [X] (e.g., how [these] platforms deal with anonymity and confidentiality). Therefore, these recommendations go beyond the ethical principles of

the TCPS-2, as they impose additional requirements beyond the protections already offered to participants.”

“The initial feedback was constructive and appropriate, but there were a couple of points that were inappropriate, some of them even rendering the research impossible and indicating that the people who reviewed the applications and provided comments did not have knowledge on the specific research context.”

“The REB should avoid sending protocols to be reviewed by people who know nothing about these systems [SONA, MTurk and Prolific] and who keep raising unnecessary roadblocks.”

“For my cross-cultural international research, the REB really didn't understand the research context at all. Therefore, some of their questions and requirements were totally inappropriate to the research context.”

“I've received feedback concerning ways to measure physiological variables that were not valid... Time was spent gathering more information to justify the use of well-defined (at least in our measurement scheme) terms.”

When asked if they reuse materials from previously approved REB applications when preparing new submissions, 95% of survey respondents (n=103) indicated they did. For example, researchers may re-purpose a previously approved consent document, or re-use a description of a method in a new application. However, 94% of respondents indicated that when they re-use previously approved materials, they are asked to change them. There may be legitimate reasons for such requests (e.g. best practices may change over time, or an important issue may have been missed in a previous application). However, in many cases this seems to arise because different REB members notice and ask for different things. In addition, many of these requests do not seem to address significant or critical ethical concerns (e.g. preference for particular terminology in a consent form).

“Inconsistency of feedback received, and the inability to always understand the logic of reviewers makes the process more about satisfying reviewers rather than ensuring ethical research.”

“There have also been many cases where information has been copied and pasted from another REB to ensure quality, only to receive feedback suggesting new changes even though the original REB application was approved.”

“It was also a replication study, in which the study was conducted only a couple of years prior at the University of Guelph. I used all the same materials as the original study but had to change up the original consent and debrief form because of ethical concerns.”

“...we often receive contrasting feedback between projects (for example, we based our latest submission off of feedback we got for the one prior, which we were told to change - it makes no sense!).”

The problem with ‘mandate drift’, inappropriate feedback, and inconsistent feedback is not just the frustration it causes, but the extra work created for both researchers and REB staff and board members, who must spend more time revising or commenting on REB application materials. A minimal risk research review process (where staff conduct reviews of routine, minimal risk applications) may aid in overcoming mandate drift ([Section 3.1](#), [Section 3.3](#)). Additional training for REB members may also help ([Section 3.2](#)).

One more consideration: In focused discussions with members of the REB, we were reminded that researchers themselves play a significant role in ensuring that an approval certificate is issued in a timely way. We were told, in fact, that roughly 20% of the applications submitted to the board for review are incomplete or incorrectly filled in, which made the review process challenging for REB members. In other words, researchers are delaying the approval process by not filling out the forms correctly or completely in the first place. (Simplification of the form, as discussed in [Section 3.5](#), possibly through an Electronic Submission System, as discussed in [Section 3.4](#), would help to ensure this problem is minimized). In this report, then, we seek a balance between acknowledging that the REB process is cumbersome and recognizing that it is a required component of research at any Canadian Institution. Both REB members and researchers bear responsibility in ensuring the process works well. Indeed, the majority of our survey respondents see the importance of the ethics process.

2.3.5 Fulfilment of Current REB Requirements May Create Ethical Problems

When asked to consider this statement: “In using my REB-approved materials (e.g. consent forms) during research, I have encountered ethical challenges that have been created by the requirements of the REB,” 31% somewhat agreed or strongly agreed (n=181). This is a large number, given that REB-approved materials should be *preventing* rather than creating ethical challenges. The most common example offered by respondents related to the lengthy ‘legalese’ required in consent documents and the negative impact this has on facilitating informed consent.

*“Even minimal-risk consent forms are often close to two pages. Other institutions have much shorter consent forms, especially for low-risk anonymized online studies – some colleagues have one-paragraph consent forms. Participants are actually *less* likely to read the longer forms, just like most people don’t read lengthy End User License Agreements for computer programs. As such, the required length of Guelph consent forms actually *increases* the risks, if there are any, because they inhibit true informed consent. Guelph should develop a much shorter template.”*

“...the length and complexity of documents intended to ensure ethical research, such as consent documents and forms, makes them practically unviable for research with many human participants, particularly those from vulnerable populations. I appreciate that the university is limiting their liability, but consent documents now often read like terms of use agreements with small print and complex legalese that nobody pays attention to. This is surely counterproductive to their intended purpose.”

“Highly convoluted, lawyerly language needed for Information Letter and/or Consent Letter is often unsettling for participants, and distances me as a researcher in an uncomfortable way from my participants.”

“I feel that our process is actually quite unethical - I am completely embarrassed to give these consent forms and informational letters etc. to potential participants. They are totally inaccessible to regular people. It doesn't allow participants to clearly receive information in a way they can use.”

“The formality of the consent forms have turned off and away multiple participants, especially Indigenous Elders who see themselves as entering into a relationship with the researcher or research project team, not signing away their inherent rights to their own words, story and knowledge. We have worked with Elders who are insulted by the formal, bureaucratic and transactional feel / language of the consent form and process and who are wary that they are being once again duped into signing something not in their interests by colonizers and colonial institutions. Participants in our studies are intimidated by the forms and many many people have commented that the forms seem to be designed to protect the institution rather than the person.”

It is essential that the REB process is simplified for research participants – who the REB is tasked with protecting – as well as for researchers and staff. However, while the purpose of the REB is to ensure research is consistent with the principles of the TCPS2, many respondents have the impression that it is instead working to protect the university; 78% of respondents agreed or strongly agreed that “REB processes are intended to limit the university's liability in research contexts.”

“Often feedback wasn't received for months on end, and much of the feedback did not seem to address ethical issues and instead requested changes seemed to be intended to cover university liability.”

*“Is the REB's job to protect participants from every possible harm, real or imagined, no matter how minimal? Is the REB's job to ensure that every aspect of a protocol is documented and catalogued for future liability? Or is it the REB's job to help researchers conduct research in an ethical way? It *should* be the latter, but in my experience it has unfortunately been the former two.”*

“[Ethics] is important to me and I see it having almost nothing to do with the REB process which feels like a word-smithing legalize jargon practice to cover the university's culpability. It is distressing and demoralizing to participate in this process. It is also embarrassing as an institution.”

“Unfortunately, from the perspective of a researcher, the entire REB process at UofG feels as if it is designed to limit the University's liability while maximizing both the PI's liability and workload.”

This widely shared perception leads to mistrust and undermines the REB process. Simplifying the REB process – for researchers as well as for research participants – will be essential for restoring some of this trust and addressing this widespread perception.

2.3.6 Negative Impact on Community-based Research

The UofG promotes and encourages community-based and community-engaged scholarship. The results of the survey, however, indicate that the REB process unnecessarily complicates the ability of researchers to form and maintain relationships with community partners. This includes partnerships with Indigenous communities where those communities have their own ethical standards and legal regimes. Specifically, these challenges include an ethics review process that does not clearly acknowledge community partner roles in the development of an ethics protocol or the possibility that communities have their own ethical understandings related to the formation of relationships and the sharing of information. In short, researchers perceive that “the REB process can hinder relationship building in community engaged scholarship, [and that] ethical research can be achieved through much simpler and more straightforward means.”

“Many community partners have complained about the multiple problems with our REB processes.”

“I do appreciate the time, feedback, and perspectives offered by folks at the REB. My challenges more related to the idea that the REB (and institution more broadly) are not setup to facilitate engagement of external community partners in research and it is difficult sometimes to fit the research into these established processes in ways that facilitate ethical and sustainable community engagement, especially in course-based partnership contexts.”

“When working on community engaged research, the process does not really facilitate meaningful collaboration with partners (either you work with partners to develop a process that works for them to risk it being rejected by the REB, or you complete the REB and risk the process being unworkable for partners). In either case, the possibility of lengthy amendments is high.”

“The turnaround time takes very long, which is really hard with working with community partners who often have tight timelines.”

These concerns contribute to the perception that the review process is a barrier to what researchers consider to be the most ethical approaches to working with community partners, approaches that include the collaborative creation of ethics protocols that put community ethics first. While the Ethics Office is known to accept and support community practices, even placing a priority on them, the scope and scale of the form combined with the timelines for navigating UofG’s REB review process hinder community engagements.

3.0 Recommendations

We make ten recommendations to address the challenges and problems outlined in the previous section. Figure 3 illustrates these recommendations in relation to the review process for minimal

risk research; some of these recommendations are specific to minimal risk research, while others will also apply to those applications that require full board review. At the end of the section, Table 1 summarizes the recommendations, indicates which challenges they address, and points to units on campus who might take responsibility for leading/supporting the implementation of recommended strategies.

The strategies were identified through the survey, in conversations with REB managers at other institutions, and in consultation with various members of the U of G community who engage with the REB (staff, faculty, etc.). It is anticipated that many of these strategies will be needed to address the full suite of challenges identified in the previous section – there is no single strategy that will address all challenges on its own. However, it is worth emphasizing that many strategies depend on hiring an additional staff person in the REB office ([Recommendation 3.1](#), see Table 1).

3.1 Hire Additional Permanent, Full-Time Staff

The REB Office is currently under-resourced, particularly in terms of staffing. There is often a bottleneck in the office, with protocols waiting on staff in order to advance through the review process. The UofG REB Office must be staffed such that it can meet a service goal of 2-3 weeks for the completion of initial submissions for delegated, minimal risk research and four weeks for full board review. Over the past several years, the number of new submissions handled by the UofG REB office has increased significantly (see [Section 2.1](#)). This volume of work cannot be managed in a timely manner by the current full-time staff complement of one manager and two coordinators. Hiring one additional PFT coordinator would help to ensure that protocols move through the process in a timely manner (and in line with service goals) and support faster processing of amendments and renewals.

Currently, the REB Manager is fulfilling the role of both coordinator and manager, such that there is no capacity in the office to deliver on the range of recommendations outlined in this report. In addition to reducing review/processing time, adding a coordinator position would free up the manager to lead implementation of the range of strategies that are necessary, including:

- supervising coordinators to complete delegated reviews ([Recommendation 3.3](#))
- providing training and feedback for REB members ([Recommendation 3.2](#));
- updating or reforming REB processes, including the development of a shorter application form ([Recommendation 3.5](#)), providing input to the development of an Electronic Submission System ([Recommendation 3.4](#)), and additional work on template language for simpler consent documents ([Recommendation 3.7](#));
- answering researcher questions and discussing applications in advance of submission ([Recommendation 3.8](#)); and
- offering additional training and workshops for graduate student researchers and new faculty members who are new to the REB process at UofG ([Recommendation 3.8](#)).

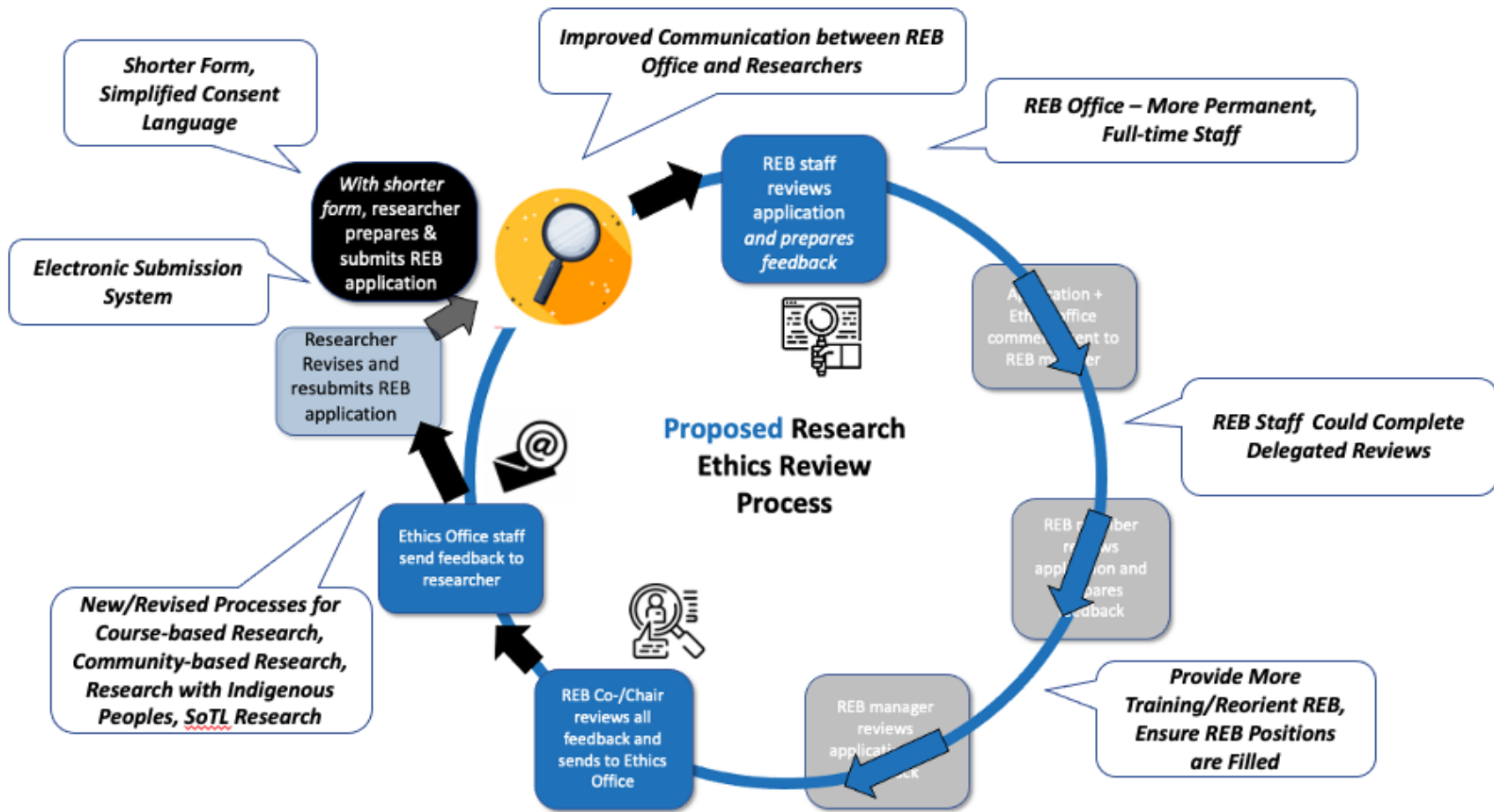


Figure 3: Recommendations to Address Current Challenges with the REB Process

While the staffing level in the UofG REB office is comparable to other institutions (when considering the staff to applications ratio), other larger REB offices are able to achieve economies of scale (e.g. the UofT REB office has one staff person whose only responsibility is processing renewals). Other REBs also have operational efficiencies compared with UofG (e.g. shorter forms, electronic submission systems, REB staff completing delegated reviews). If the number of REB submissions and amendments continues to grow at the UofG, then staffing levels must be reviewed regularly to ensure they are appropriate.

The need for more staff in the REB office was also recognized by many survey respondents, who commented on this unprompted.

“MORE STAFF!!!!”

“Increase the number of reviewers and REB support staff, so [they] can deal with the increasing number of submissions in a timely manner.”

“It also seems prudent that the University administrators choose to invest more in REB. More staff, greater support, and genuine investment in improving the process would go a long way.”

“Increase budget/personnel within the main REB office to reduce turn-around times, especially for the most minor amendments (adding a new student investigator to an existing protocol shouldn't take more than 24 hours).”

“MORE PERMANENT STAFF and FAR better transitional training”

“I also find the Ethics office staff helpful however there seems to be not enough support for them to do their job well... increase the people power to facilitate the review process”

3.2 Ensure REB Positions are Filled and Resume/Improve Training for REB Members

In addition to more staff in the REB office, there is a need to ensure that the REB itself always has a full slate of members. Currently, per the [Terms and Conditions](#)⁷ of the REB at UofG, a minimum of 12 faculty members must serve as REB members (6 on REB-G and 5 on REB-NPES); this does not include alternate members, many of whom are also faculty (18 total positions on REB-G and 15 total positions on REB-NPES).

Some survey respondents suggested that a larger REB may be necessary:

“... requiring more faculty members volunteer to serve on REB, especially linked to how much colleges are making use of the REB system, will help remove the current bottleneck for research at the university.”

⁷ See <https://www.uoguelph.ca/research/document/research-ethics-board-terms-and-conditions>

“I appreciate the difficulties in speeding up the process, but it is too slow for us to be competitive with research intensive universities. Maybe expanding committee membership to split applications across multiple working groups?”

“I would also advise that we should have... an REB that is three times the size of what currently exists. The group needs more resources to support the work it is doing.”

However, increasing the number of REB members would exacerbate challenges related to consistency (see [Section 2.3.4](#)), and cannot address timeline delays that result primarily from a bottleneck in the REB office (related to staff review and processing of files), which would be addressed by more staff (see [Recommendation 3.1](#) above). In the current process, REB members are asked to review protocols within one week; they already meet this deadline most of the time.

The main problem with the REB seems to be the frequency with which faculty positions are vacant rather than the size of the board. As of September 2022, there will be 8 faculty vacancies on the REB-G (5 regular members and 3 alternate members) and 2 faculty vacancies on the REB-NPES (both alternate members). It has been increasingly difficult to fill these positions in recent years, which creates more work for other board members.

With the increase in the number of new REB submissions over the past five years, the workload for REB members has increased substantially. REB members complete reviews amidst all other teaching, research, and service responsibilities.

“I served as a reviewer of the REB a few years ago. I had to review about 4-5 applications per week. After serving one year, I felt I could not do this anymore. It was taking too much time to review so many applications every week...”

“There is a lot of faculty complaining about the REB process but very few people put their hand up to serve although they draw on the resources of the REB committee regularly. This needs to stop! It is unfair and inefficient... What slows things down as a REB committee member is being sent two or more reviews in one week which have not been reviewed by the REB office. These are very time-consuming and hard to fit in with an already crammed workload... it would be manageable to complete one delegated review every couple of weeks that has been thoroughly checked by the office. The REB committee member could then more quickly review the application and consent checklist and return this in a timely manner.”

The process by which faculty REB members are appointed needs to be reviewed by Chairs and Deans/Associate Deans in appropriate units, with faculty input. Positions on the REB must be consistently and appropriately filled.

REB members recognize their work as fulfilling an essential service role on campus, so do not see typical faculty incentives (e.g. course release after a certain period of service on the REB) as appropriate or feasible. However, given the significant workload associated with serving on the REB (up to 15 hours per month, average ~8 hours per month), it is essential that (1) this service is appropriately recognized and (2) other service expectations are minimized. One way of

recognizing this service is through an annual letter to REB members from the Office of Research (cc to Chairs, Associate Deans, etc.) noting the number of reviews completed. Service of all REB members could also be recognized through other venues (e.g. College-level newsletters, etc.) - it is important that researchers recognize the work completed by their colleagues on the REB on their behalf. Finally, faculty must be willing to serve on the REB when asked, so long as it fits within their service DOE.

It is also essential that REB members receive appropriate training. New REB members need onboarding (e.g. orientation to how to complete reviews, what to look for, how to provide appropriate feedback), while both new and current REB members would benefit from feedback on their reviews, from REB staff, to ensure consistency across reviews and appropriateness of feedback. There is a sense among the UofG community that a 'culture shift' is needed regarding the purpose of REB review.

"The goal of the REB should be to help reviewers conduct their research ethically, but that seems to be currently missing. One way to resolve that would be by better training of REB members, especially regarding the goals of the REB, what it's supposed to be there for, and what kinds of comments are and aren't required."

"The reviewers also should be given permission and space to simply pass applications without commenting on anything. I'd really like to know how many apps are approved without revisions. For the few years I sat on the REB, I saw NO applications that were simply approved. Why? What I witnessed was a culture of assessment and judgement where reviewers were looking for issues, to "catch" a student or researcher in something they were or were not doing. The unspoken emotional atmosphere was that we needed to find issues in order to demonstrate that we were doing our jobs well. I also saw reviewers raising NEW issues with revised REB applications that had already been submitted once. This should be discouraged as much as possible."

"There is also a significant difference in the review received depending on the reviewers, analogous to journal manuscript reviewers. Some REB reviewers are much more demanding than others - the normalization processes that are in place for REB reviewers needs to be reconsidered."

"It's absolutely true that the same protocol text will not pass REB approval when re-submitted even within the same year. This makes me suspect that the REB members feel that it's their job to find things that need changing, rather than to check for legitimate issues. Faculty are trained to critique and the REB members do just that - whether it's merited or not."

"We need a reset at UofG. Not another expensive software platform. Not more tutorials. Rather, a redefining of the priorities, key concerns regarding ethics and how to get everyone on the same page so we are managing them more effectively. This is not the staff's fault. They are overworked and doing their best. But, a lot of the overwork comes from dotting i's and crossing t's that do not matter other than covering liability, leaving other critical gaps. Forest for the trees sort of thing."

Given the already significant workload associated with serving on the REB, training must be targeted and manageable (e.g. one orientation session per new member; an annual half-day retreat for all members). However, providing training and feedback on reviews requires REB staff capacity (see [Section 3.1](#) and [Section 3.8](#)). In addition, as noted above, researchers must also take responsibility for submitting complete and thorough applications ([Section 2.3.4](#)) and consulting with the REB as appropriate (see Table 1, [Recommendation 3.8](#)). A culture shift needs to include all stakeholders (REB members, staff, and researchers).

3.3 REB Staff Complete Delegated (minimal risk) Reviews

In the current process at UofG, delegated reviews are assessed by a staff member, up to two REB members, and a REB chair or co-chair and the manager. The lengthy review times experienced at UofG are thus partially a result of the number of people who review each application.

REBs at some other Ontario institutions avoid this problem by having REB staff complete delegated reviews, instead of REB members. This is permitted under the TCPS2, if staff (coordinators) are appointed as non-voting members of the REB, and so long as they “...have the requisite experience, expertise and knowledge comparable to what is expected of REB members...” (TCPS2 Article 6.4). While it is important to have faculty members on the REB, in many cases minimal risk protocols are being reviewed by REB members who are not expert in the relevant methodology; qualified staff members would be able to gain necessary familiarity with the range of methodologies that appear in minimal risk REB submissions. Having qualified staff complete delegated reviews would help to address two significant problems: lengthy timelines ([Section 2.3.1](#)) and inconsistent and inappropriate reviews ([Section 2.3.4](#)). It is also consistent with a proportionate approach to ethics review, as outlined by the TCPS2. However, this recommendation would only be possible if there were more staff capacity in the REB office (see Table 1, [Recommendation 3.1](#)).

“If well-trained administrators find no fault in a routine application, then they should be authorized to sign off. We are too puritan in our approach.”

“The biggest improvement for me would be to have extremely expedited reviews (no faculty review, only staff review) for minimal risk protocols, and to have it abundantly clear how to fashion a research process that it is indeed minimal risk.”

“...the delay and inconsistent response of the REB application process can be identified by the limited staff within the REB office. Other Ontario universities have a cadre of staff that will handle many of the delegated reviews. This could increase the consistency in feedback as well as decrease the processing time. I am guessing the University receives more protocols each year. The workload that is placed on those that sit on the REB is becoming greater which is likely the cause of faculty members not wanting to participate on this important committee. Having dedicated individuals to review low risk REB applications is certainly more efficient (salary and time) than having faculty members squeeze this activity into their already busy day.”

“We need some sort of faster route for low-risk research that could be approved by a staff person.”

3.4 Implement an Electronic Submission System

A total of 67% of survey respondents agree that an electronic REB submission system would be very or extremely helpful. However, several respondents also noted that this alone will not address many of the problems being experienced. It is **essential** that an online system be tailored to UofG, allow for smart/branching logic such that only required components of the form are completed, and enable multiple users who are working on a project (faculty, staff, students, etc.) to all access an application. There is widespread concern that a new system would simply create new problems and add to everyone’s workload.

“An electronic submission system is likely to increase the time required for completing the applications and the burden of researchers. (The last online REB system did not work well.)”

It is also essential that REB staff, REB members, and researchers all be involved in selection/development of an electronic system when one is adopted. The University of Waterloo system (KUALI) is one that could be considered.

“If it were an electronic system that has been tried-and-tested and is already in use and well-received at other universities, I think that could be very ideal. (It seems U of G often wants to “create new” with electronic systems which doesn't always go smoothly!)”

In addition to previous difficult experiences with an electronic system implementation at UofG, there are other REBs in Ontario that have sub-optimal electronic systems that frustrate users; such systems would do little to alleviate the problems identified. Ultimately, it is people (whether REB staff or board members) who must review applications; an electronic system without more staff support can only offer a partial recommendation.

“Regarding the idea of an electronic submission system: I am in favour of an electronic submission system if it can be shown/determined that it will improve the process. My fear is that an electronic system without additional resources is the same as we have now, just with an electronic form.”

If it is coupled with other recommendations and built to meet UofG needs, with input of all stakeholders, a well-designed electronic system can play an important part in addressing current challenges.

“I came from another university that had an online process - it was much simpler and more user friendly. You could find the version of what you needed, recycle things, and quickly renew approvals, etc.”

“I believe that having an online system that is well crafted would be extremely helpful.”

“In a previous institution (16 years ago!), we moved from a paper model to an electronic submission system and there was an immediate improvement in the speed and quality of the feedback.”

One of the main benefits of an electronic system is the automation of certain tasks that are currently performed by staff (e.g. emailing renewal notices, certificates); unless/until an electronic system is in place, it is essential that the REB office has adequate administrative support.

3.5 Develop a Simpler Application Form

A simpler application form, and one that worked in conjunction with an electronic system, would aid both researchers and reviewers in more efficient processing of REB applications. This is particularly true for minimal risk research for which there is the impression that the form, as it currently exists, is onerous and unnecessarily complicated (see [Section 2.3.2](#) for comparison with other institutions). If an electronic submission system is coming soon, then a new form can part of the development of an electronic system. However, it is essential to recognize that an electronic system cannot simply recreate the current form in an online environment.

“There should be a short version of the forms for those who are requesting approval for non-invasive procedures. It is wasteful to have someone applying to conduct a survey fill out a form that is designed for those who want to biopsy people, for example. It should be possible to have a dedicated, shorter form intended only for those who are conducting surveys.”

“Guelph should develop a much shorter template.”

“a new form”

“Shortening and removing the duplication within the forms. Having submitted at several institutions, ours seem the most labyrinthine.”

“Guelph might also consider a separate form for studies that are also minimal risk. Right now, the massive REB form adds to researchers’ workloads, the REB response time, and to the burnout experienced by many REB members.”

“The application needs a complete overhaul -- to be streamlined and shortened.”

3.6 Create an Online Repository for Previously Approved Protocols and Related Documents

A total of 81% of respondents agree it would be very or extremely helpful to have a repository where standard operating procedures (SOPs), Core Certificates, etc. could be housed. Such a repository would be available to applicants, reviewers, and REB staff. In theory, this would avoid the need to upload such documents with each new application (save time/work), and also provide a shared understanding of what has been previously approved, to help reduce inconsistency across reviews.

“... keeping a bank of relevant documents so they don't have to be repeatedly submitted (SOPS CORE etc.) would be extremely helpful. Finally, if a method etc has been submitted/approved, there should be an easy way to note this so it is rubber stamped again. SOPs should work this way, but we often avoid them because the current process makes it harder than just re-writing the text.”

“Maybe some sort of standardized forms for people who want to do a certain kind of research (e.g. if you want to interview people REB suggestions things online that you can select) - why would each student have to figure out how to transmit data or store it? couldn't the answers be provided to them somehow and they just follow that protocol?”

“Also, if the REB set specific criteria that all researchers should follow (e.g. data security and retention criteria), the researchers could simply attest that they will follow that requirement rather than have to re-write this every time or to adjust what they do when the university changes its policies.”

3.7 Provide Standard, Proportionate, and Simpler Language for Consent Forms

While there are many [resources available on the REB website](#) concerning consent and how to complete consent documents to REB specifications,⁸ a total of 74% of survey respondents agree that simpler consent language, and particularly language in proportion to the proposed project risk, would be very or extremely helpful. Researchers feel frustrated that, even when they rely on these resources, their forms are found inadequate. Ideally, such standard/approved language would be more concise (addressing concerns that such documents are too long, and create ethical problems of their own), prevent ‘overreach’ (to specific words/phrases that are not critical in terms of ethics), and address inconsistencies across reviews (such as requests to change previously approved wording). Standardized/approved language would be optional, recognizing that every study is different. It is hoped that this will address some researcher frustration, such as inconsistency across reviews, and if proper training is provided for researchers, REB members and Ethics office staff, it may also reduce the perception that REB protocol reviews ‘overreach’. In other words, consent documents will be more clearly written by researchers and feedback to researchers will be more focused on ethical concerns.

“I very badly want approved templates for certain kinds of minimal-risk work, such as anonymous online surveys.”

“I think the core issue is that the REB needs standard language and process. In turn, this would mitigate lengthy review and revision processes... The REB is inconsistent to a T and it means hours spent making edits to previously-approved language in order to pass whatever the bar of the day is.”

*“Regarding standard language for consent forms: this could be effective if done well (e.g., *short* consent forms), but would be bad if the standardized language were as*

⁸ <https://www.uoguelph.ca/research/services-divisions/ethics/obtaining-consent>

wordy as it currently is. Long consent forms are actually counterproductive, because they make participants less likely to read them.”

“Standard consent forms will only be useful if they are simple and clear and have no expectation that researchers will follow them to the letter. Every study is different/unique; every participant is unique; one size does not fit all.”

3.8 Improve Communication Between Researchers and the REB Office

While any researcher can consult with the REB office, many do not realize they can do so, or are not familiar with communication possibilities. Several challenges could be avoided or ameliorated by improved communication between researchers and the REB. There are many ways this could happen, including (but not limited to):

- Faculty reps (REB members) could create a standing item on department meeting agendas for REB updates and questions
- The REB manager could visit faculty meetings, to help create a culture of communication with the REB
- The REB should continue its ‘brown bags’ - reminder notices could be sent to relevant departments (including graduate student listservs), posted on College Teams sites, etc. to improve attendance
- The REB website could have a “book an appointment” link, to allow researchers to easily schedule consultations with REB staff prior to protocol submission
- The REB office could establish a dedicated Teams channel or online ‘chat’ function that researchers could access at any time (via the REB webpage) for quick questions
- REB staff could conduct more outreach/training (e.g. in relevant graduate courses, for researchers new to UofG)
- Regular reporting (through Senate, ‘Research Alerts’, and other venues as appropriate) to share key metrics, such as the number of REB applications/amendments processed annually, review timelines (minimum/average/maximum), etc.

There is currently no capacity in the REB office for most of the items above ([see Recommendation 3.1](#)). It would help to have a staff member in the REB office who serves in a dedicated ‘educator’ role – providing training and outreach for both REB members and researchers (including students).

A total of 46% of survey respondents agree it would be very or extremely helpful if an opportunity for a video or phone call happened during the review process.

“We have rarely had misunderstandings come from the review, but these could have been prevented with a quick call/chat at the time of submission. I like that idea.”

Similarly, 43% of respondents agree this would be very or extremely helpful if it were possible before submitting an application.

“One way I could imagine spending time on REB (instead of courses, videos, etc.) would be to have an REB staff member walk through every form with my student (and sometimes me), crafting the proposal such that it will be approved very quickly (even instantly – like a credit card). It was easier and FAR QUICKER for me to refinance my gigantic S. Ontario mortgage this past fall because I had someone walk with me through the whole thing.”

“Having the materials looked through and approved quicker would be useful. As well, it is really difficult to contact someone to ask questions during the process.”

“I very much appreciated conversation over phone/teams with REB in this process. This was the most helpful.”

For those researchers who do consult with the REB, they find the advice and support helpful. The challenge is that many researchers (including faculty, graduate students and others) do not know how to communicate effectively with the REB, and the REB does not have the capacity to communicate with all researchers in relation to every submission.

3.9 Empower Departments to Create Departmental Research Ethics Committees

The TCPS2 ([Article 6.12](#)) allows for review of protocols on the basis of foreseeable risk. Further, minimal risk course-based research that emphasizes teaching can take place within a department or a college. The TCPS2 states:

An institution may decide that ethics review of minimal risk course-based research activities with a primarily pedagogical purpose can be delegated to non-REB members at the institution’s department, faculty or equivalent level. Such pedagogical activities are normally required of students (at all levels) with the objective of providing them with exposure to research methods in their field of study (e.g., interviewing techniques).

The TCPS2 notes that once course-based research becomes part of a researcher’s research program, the review of the research protocol should go to the REB for delegated or full-board review (TCPS2, Section 6.12).

While many departments and units at UofG may not be interested in conducting ethics reviews of minimal risk protocols designed for pedagogical purposes and uses, Colleges may wish to facilitate conversations related to this possibility.⁹

“I would strongly like to see the REB processes around course projects and for low-risk graduate research be revised to streamline processes. Other Canadian universities have very different processes that I have found more efficient both as a course instructor and as a graduate supervisor.”

⁹ For example, Wilfrid Laurier University allows for review at the department level of teaching-related protocols. Several criteria must be met before such review can occur. More details are available here: <https://students.wlu.ca/academics/research/human-research/index.html#beforeyouapply>

“A course-based community engagement form/process that allows for smaller scope research and engagement to be reviewed more quickly as semester timelines are only 12 weeks and there is often not capacity to complete the full REB application prior to the course beginning, and partnerships are not far enough along before the course to complete the REB sometimes.”

“There should be a process to get approval of a study protocol for certain courses that allow for no to minor methodological changes without full resubmission each year. Or for the introduction of a process that allows for departmental experts to assess and grant approval for such low-risk studies.”

3.10 Develop Processes for Reviewing Specific Types of Scholarship or Methodologies

Many survey respondents discussed the challenges they face in navigating ethics review for their particular type of research. Here we wish to highlight three examples, as they may warrant their own (re)evaluation. Developing, reviewing, and/or revising processes for these specific types of research will require that other recommendations be implemented first (or concurrently).

First, several respondents highlighted the unique ethical concerns associated with Scholarship on Teaching and Learning (SoTL).

“It would be very helpful to have a SoTL research 'stream' or subcommittee that deals exclusively with SoTL projects. Some ethical concerns in SoTL research are unique (e.g., giving grades as a research incentive, using a classlist to recruit participants). Therefore it would be great to have a committee that is specifically trained in these issues. It would also potentially streamline the whole REB process if SoTL research went through a different stream. The SoTL application could be shorter as some issues rarely apply in SoTL research (e.g., the collection of biological samples) and SoTL research is typically very low risk.”

If REB staff were to begin completing delegated reviews ([Section 3.3](#)), then a staff person with expertise in SoTL could review these applications. If not, other strategies could be considered in consultation with the community of SoTL researchers on campus.

Second, community-based researchers also face unique challenges with the review process.

“When working on community-engaged research, the process does not really facilitate meaningful collaboration with partners (either you work with partners to develop a process that works for them to risk it being rejected by the REB, or you complete the REB and risk the process being unworkable for partners). In either case, the possibility of lengthy amendments is high.”

“The REB process can hinder relationship building in community engaged scholarship - ethical research can be achieved through much simpler and more straightforward means.”

Again, a dedicated consultation process with community-based researchers would yield more nuanced diagnosis of problems and solutions. Some of these may be addressed by recommendations already outlined above.

Finally, while research with Indigenous communities is already addressed in the TCPS2 (Chapter 9) and there is a (currently vacant) position for an Indigenous ethics advisor on the REB-G, several researchers identified challenges in conducting ethical research with Indigenous communities through the current REB process.

“The formality of the consent forms have turned off and away multiple participants, especially Indigenous Elders who see themselves as entering into a relationship with the researcher or research project team, not signing away their inherent rights to their own words, story and knowledge. We have worked with Elders who are insulted by the formal, bureaucratic and transactional feel / language of the consent form and process and who are wary that they are being once again duped into signing something not in their interests by colonizers and colonial institutions. Participants in our studies are intimidated by the forms and many many people have commented that the forms seem to be designed to protect the institution rather than the person.”

Other challenges relate to the bureaucratic process associated with managing incentives (honoraria) for Indigenous elders and research participants, among others. Challenges extend beyond the REB specifically (e.g. to research finance), and the need to transform research with Indigenous peoples is already documented in the UofG Indigenous Initiatives Strategy Summary Report, [BI-NAAGWAD IT COMES INTO VIEW](https://indigenous.uoguelph.ca/system/files/Indigenous-Initiatives-Strategy-Summary-Report.pdf).¹⁰ The REB needs to be part of these ongoing conversations and transformation processes on campus.

¹⁰ See: <https://indigenous.uoguelph.ca/system/files/Indigenous-Initiatives-Strategy-Summary-Report.pdf>

Table 1: Summary of Recommendations

| Recommendation | Problems Addressed | Summary of How Recommendation Addresses Problems | Connections with Other Recommendation(s) | Offices/Groups who could Lead/Support |
|---|-------------------------|--|--|--|
| 3.1 - Hire additional, permanent full-time staff | 2.3.1 2.3.3 2.3.4 | <p>Supports faster processing of applications by addressing workload issues (bottleneck) in REB office due to increasing number of applications/amendments</p> <p>More staff capacity to ensure consistency in reviews and familiarity with appropriate processes.</p> <p>Provides dedicated staff for renewals and timely amendments</p> <p>Frees REB Manager to oversee, lead, and implement other recommendations</p> | Will support all other recommendations | <p>Office of Research</p> <p>Other offices concerned with negative impacts on research and teaching (e.g. Provost, OGPS, Colleges)</p> |
| 3.2 - Ensure REB Positions are Filled and Resume/Improve Training for REB Members | 2.3.1 2.3.4 | <p>Ensure REB is always operating at full capacity, to support timely review of applications</p> <p>Provide greater clarity for REB members about goals and approach to ensure targeted and timely feedback</p> | Training requires 3.1 for Manager time | <p>REB Manager</p> <p>Deans and ADRs</p> <p>Chairs</p> <p>Researchers (REB members)</p> |
| 3.3 - REB Staff Completed Delegated Reviews | 2.3.1 2.3.4 | <p>Simplification. Supports faster processing time (removes time-consuming step) and greater consistency/accuracy across reviews. Dedicated staff become familiar with nuances of ethical issues (or lack thereof) for particular methodologies</p> <p>Frees time of REB members for full-board review; addresses workload/burnout for REB members</p> | Not possible without 3.1 | <p>Office of Research</p> <p>REB office</p> |

| Recommendation | Problems Addressed | Summary of How Recommendation Addresses Problems | Connections with Other Recommendation(s) | Offices/Groups who could Lead/Support |
|---|-------------------------|--|--|--|
| 3.4 - Implement an Electronic Submission System | 2.3.1 2.3.2 2.3.3 | <p>Using branching logic, the application could be tailored to only include relevant portions of REB application</p> <p>A 'smart' form could automatically populate relevant sections using previously entered information, reducing errors and workload for researchers completing application</p> <p>Easy integration of repository items and/or standard language</p> <p>Link to researcher central login to avoid need for attestation</p> <p>Ability to include "self-serve" amendments that do not require review (e.g. addition of research staff to protocol)</p> <p>Quicker and easier for REB staff and REB members to evaluate applications</p> <p>Central storage and indexation of all approved protocols</p> | <p>Must include 3.5</p> <p>Could include 3.6, 3.7</p> | <p>Office of Research</p> <p>CCS</p> <p>REB office</p> <p>REB members</p> <p>Researchers</p> |
| 3.5 - Develop a Simpler Application Form | 2.3.1 2.3.2 | <p>Quicker and easier to evaluate applications for REB staff and REB members</p> <p>Quicker and easier for researchers to complete application</p> | <p>Could happen alone or as part of 3.5; requires 3.1 for Manager time</p> | <p>REB Office</p> |
| 3.6 - Create an Online Repository for Previously Approved Protocols | 2.3.1 2.3.2 2.3.4 | <p>Indexation of approved methods, which can be reused without re-review. Avoids conflicting feedback.</p> <p>Clear indication of preferred approach to common research methods, with agreed upon language</p> <p>Could promote "check-box" solutions on application and pre-approval of recycled methods.</p> <p>Allow researchers to attest to follow clear policies - reduces application bulk and chances for error</p> | <p>Requires 3.1 for Manager time</p> | <p>Office of Research</p> <p>REB Manager</p> <p>CCS</p> |

| Recommendation | Problems Addressed | Summary of How Recommendation Addresses Problems | Connections with Other Recommendation(s) | Offices/Groups who could Lead/Support |
|---|---------------------------|---|---|--|
| 3.7 - Provide Standard, Proportionate, and Simpler Language for Consent Forms | 2.3.5 | Reduce length/complexity of consent forms | Requires 3.1 for Manager time | REB Office |
| 3.8 - Improve Communication Between Researchers and the REB Office | 2.3.2 2.3.4 | <p>Improve quality of initial REB applications (avoids researchers ‘guessing’ at what will be approved most easily, ensures accurate completion of form and consideration of relevant issues)</p> <p>Improve trust, increase transparency, and reduce researcher frustration with process</p> <p>Reduce the number of full board reviews for minimal risk and course related research</p> | Requires 3.1 for Manager time | REB Office Researchers CCS |
| 3.9 - Empower Departments to Create Departmental Research Ethics Committees | 2.3.1 | Enable rapid reviews of course-based research, to support research as key type of experiential learning | Requires 3.1 for Manager time | REB Office ADRs Chairs Researchers |
| 3.10 - Develop Processes for Reviewing Specific Types of Scholarship or Methodologies | 2.3.6 | More work would be needed to diagnose specific needs/strategies for improving review process for SoTL, community-based research, and research with Indigenous peoples | Should be considered concurrently with or after all other recommendations | REB Manager President's Advisory Committee on Indigenous Initiatives Researchers |

UofG REB user survey 2022

Start of Block: Introduction - Context

Q1 Introduction and Purpose of the Survey

You are invited to participate in a survey about the Research Ethics Board (REB) at the University of Guelph. As a user of the REB who conducts ‘human participant research,’ your responses will help us to understand your experiences with the REB and its research ethics approval processes. We are interested in understanding the common challenges researchers face when seeking REB approval. Our goal is to identify recommendations that, if implemented, could directly and positively impact the REB approval process.

This survey was designed and facilitated by the REB Working Group, an ad-hoc university committee that is operating independently of both the Office of Research and the Research Ethics Board. The REB Working Group was formed at the invitation of Karina McInnis, Associate Vice-President, Research Services. Working group members are Drs. Jamie Burr (Human Health and Nutritional Sciences), Noella Gray (Geography, Environment, and Geomatics), Tad McIlwraith (Sociology and Anthropology), and Lori Ann Vallis (Human Health and Nutritional Sciences).

Our goal is to understand the experiences of REB users and to make recommendations to the Office of Research and to both the General (REB-G)) and Natural Physical Engineering Sciences (REB-NPES) Research Ethics Boards about how REB processes can be improved. During the W22 semester, we are collecting information and consulting with REB stakeholders across campus to prepare a report which will be shared with the University community.

This survey is conducted as a component of ‘program review’ and as such is not subject to REB oversight. That said, this preamble shares your rights as a survey participant. If you have any questions regarding this survey or the REB Working Group, please contact Noella Gray, REB Working Group Chair, at grayn@uoguelph.ca.

Survey Procedures, Participation and Withdrawal

The survey is shared via Qualtrics. Your participation in this survey is voluntary. By entering the online survey, you consent to participating in it. Once you begin the survey, you may choose to skip any question. You may quit the survey for any reason without any penalty, by closing your browser. Once you begin completing the survey, it is not possible to withdraw from participation as answers are recorded after each question and we cannot identify which answers are yours. By completing the survey, you consent to our use of the information you provide. The survey will take you 15-20 minutes to complete.

Confidentiality and Anonymity

We do not intend to collect information that will directly identify you. We do, however, ask for information about your role on campus. Please note that if you provide specific details of your REB experience, or of your research protocol, your identity may be unintentionally revealed. Because data collection in this survey occurs online, complete confidentiality of the information you provide cannot be guaranteed while data are in transit over the Internet. We recommend that if you are using a public computer to fill out the survey, you protect your privacy by erasing the browser's history, empty the browser cache, and close the browser.

Risks and Benefits of Participation

It is entirely possible that reflecting on your experiences with the REB may provoke feelings of frustration. But generally, there are no risks of participation in this survey. Similarly, there are no material benefits of participation. We are hopeful, however, that your responses will help us provide the Office of Research with a robust set of recommendations for improving REB processes.

Sharing of Results

The analysis of this survey and the summary of results will be shared publicly with the University of Guelph research community, including members of the university leadership team, the Office of Research, the Research Ethics manager, members of both of U of G's Research Ethics Boards, and REB users. The raw survey data will not be shared publicly.

Thank you for completing this survey! We expect that your comments will help us develop a set of recommendations for the Office of Research around improving REB processes. By clicking the arrow below to begin the survey, you consent to participating in it.

Page Break

Q2 What is your current role at the University of Guelph?

- Undergraduate student
 - Masters student (e.g. MA, MSc)
 - PhD student
 - Post-doctoral researcher
 - Faculty
 - Staff
 - Other _____
-

Q3 In your current role, which College or unit are you affiliated with?

- College of Arts (COA)
 - College of Biological Science (CBS)
 - Gordon S. Lang School of Business and Economics
 - College of Engineering and Physical Sciences (CEPS)
 - College of Social and Applied Human Sciences (CSAHS)
 - Ontario Agricultural College (OAC)
 - Ontario Veterinary College (OVC)
 - Library
 - Office of Teaching and Learning
 - Other _____
-

Display This Question:

If In your current role, which College or unit are you affiliated with? = College of Arts (COA)

Q4 With which department or school are you affiliated?

- Department of History
 - Department of Philosophy
 - School of English and Theatre Studies
 - School of Fine Art and Music
 - School of Languages and Literatures
 - Prefer not to say
-

Display This Question:

If In your current role, which College or unit are you affiliated with? = College of Biological Science (CBS)

Q5 With which department are you affiliated?

- Department of Integrative Biology
 - Department of Molecular and Cellular Biology
 - Department of Human Health and Nutritional Sciences
 - Prefer not to say
-

Display This Question:

If In your current role, which College or unit are you affiliated with? = Gordon S. Lang School of Business and Economics

Q6 With which department or school are you affiliated?

- Department of Management
- Department of Economics and Finance
- Department of Marketing and Consumer Studies
- School of Hospitality, Food and Tourism Management
- Executive Programs
- Prefer not to say

Display This Question:

If In your current role, which College or unit are you affiliated with? = College of Engineering and Physical Sciences (CEPS)

Q7 With which department or school are you affiliated?

- Department of Chemistry
- School of Computer Science
- Department of Mathematics and Statistics
- Department of Physics
- School of Engineering
- Prefer not to say

Display This Question:

If In your current role, which College or unit are you affiliated with? = College of Social and Applied Human Sciences (CSAHS)

Q8 With which department are you affiliated?

- Department of Family Relations and Applied Nutrition
 - Department of Geography, Environment and Geomatics
 - Department of Psychology
 - Department of Political Science
 - Department of Sociology and Anthropology
 - Other centre, institute or program
-

Prefer not to say

Display This Question:

If In your current role, which College or unit are you affiliated with? = Ontario Agricultural College (OAC)

Q9 With which department or school are you affiliated?

- Department of Food, Agricultural and Resource Economics
- Department of Animal Biosciences
- School of Environmental Sciences
- Department of Food Science
- Department of Plant Agriculture
- School of Environmental Design and Rural Development
- Other _____

Prefer not to say

Display This Question:

If In your current role, which College or unit are you affiliated with? = Ontario Veterinary College (OVC)

Q10 With which department are you affiliated?

- Department of Biomedical Sciences
 - Department of Clinical Studies
 - Department of Pathobiology
 - Department of Population Medicine
 - Prefer not to say
-

Display This Question:

If What is your current role at the University of Guelph? = Faculty

Q11 Have you ever served as a member of the REB at the University of Guelph?

- No
- Yes - I am/was a member of the REB-G
- Yes - I am/was an alternate member of the REB-G
- Yes - I am/was a member of the REB-NPES
- Yes - I am/was an alternate member of the REB-NPES

End of Block: Introduction - Context

Start of Block: Application History

Display This Question:

If What is your current role at the University of Guelph? = Faculty

Q12 Have you submitted at least one REB application in the past three years, as the PI?

- Yes
- No

Skip To: End of Survey If Have you submitted at least one REB application in the past three years, as the PI? = No

Display This Question:

- If What is your current role at the University of Guelph? = Undergraduate student*
- Or What is your current role at the University of Guelph? = Masters student (e.g. MA, MSc)*
- Or What is your current role at the University of Guelph? = PhD student*
- Or What is your current role at the University of Guelph? = Post-doctoral researcher*
- Or What is your current role at the University of Guelph? = Staff*
- Or What is your current role at the University of Guelph? = Other*

Q13 While faculty must submit REB applications as the PI, in many cases they do so on behalf of graduate students, postdoctoral researchers, or other members of the campus community.

Have you helped to prepare at least one REB application in the past three years, which was related to your own research? (e.g. for your thesis/dissertation, postdoctoral research)

- Yes
- No

Skip To: End of Survey If While faculty must submit REB applications as the PI, in many cases they do so on behalf of gradu... = No

Q14 Consider the REB application(s) that you have submitted in the past three years. Did it/they include any of the following supplements? Please check all that apply.

- Supplement I: Sona
- Supplement II: Secondary Use of Data
- Supplement III: Cross Cultural Research
- Supplement IV: Biological Specimens
- Supplement V: Clinical Trials

Q15 For your most recent REB application, how many additional documents (e.g. CORE certificates, SOPs, consent documents, information sheets, etc.), were you required to append? Please indicate the number.

Display This Question:

If What is your current role at the University of Guelph? = Faculty

Q16 How many open REB protocols do you have currently? (An open REB protocol refers to research that has been approved by the REB, for which you have been provided a certificate of approval, and that is still ongoing). Consider all open protocols that list you as PI.

- 0
- 1
- 2
- 3
- 4
- 5
- 6 or more
- Not sure

Display This Question:

If What is your current role at the University of Guelph? = Undergraduate student

Or What is your current role at the University of Guelph? = Masters student (e.g. MA, MSc)

Or What is your current role at the University of Guelph? = PhD student

Or What is your current role at the University of Guelph? = Post-doctoral researcher

Or What is your current role at the University of Guelph? = Staff

Or What is your current role at the University of Guelph? = Other

Q17 How many open REB protocols do you have currently? (An open REB protocol refers to research that has been approved by the REB, for which you have been provided a certificate of approval, and that is still ongoing). Consider only open protocols that relate to your own research (e.g. thesis/dissertation, postdoctoral).

- 0
 - 1
 - 2
 - 3
 - 4 or more
 - Not sure
-

Q18 Approximately how many hours did it take to prepare the initial submission for your most recent REB application? If others also worked on the application, consider only the hours you worked.



Q20 After receiving initial feedback from the REB, how many hours did it take to revise your application for resubmission? Again, please consider only the hours you worked yourself.

Q19 Did anyone else spend time helping you to prepare your most recent REB application?

- Yes
- No

End of Block: Application History

Start of Block: REB Process/Experience

Q21

The REB website indicates that the approval process “will take four to six weeks, depending on the complexity and quality of the submission.” Given this, how would you characterize the timeline of the approval process for your most recent REB submission?

- Much quicker than expected (
- Quicker than expected (
- As expected (4-6 weeks)
- Longer than expected (>6 weeks)
- Much longer than expected (>8 weeks)



Q22 If you have email records pertaining to your most recent REB submission, please refer to them in order to help us accurately report on experiences using the REB.

When did you submit your most recent application to the REB (mm/dd/yyyy)?



Q23 Again referring to your email records, when did you receive an initial (first) feedback letter from the REB on this most recent application (mm/dd/yyyy)?

Page Break

Q24 In the past three years, have you ever altered your research plans in anticipation of a lengthy REB review process at the University of Guelph?

Yes

No

Display This Question:

If In the past three years, have you ever altered your research plans in anticipation of a lengthy R... = Yes

Q25 If yes, which of the following approaches have you used to adapt your research plans? Please check all that apply. (Please consider only those changes related to REB review timelines, rather than COVID challenges, etc).

Decided not to involve human participants in a research project

instead

Asked a collaborator at another institution to submit an application to their REB

Decided not to conduct a particular research project

Decided not to submit a grant application

Asked a collaborator at another institution to submit a grant application as PI

Advised a graduate student to avoid research involving human participants

Other _____

Page Break

Q26 All research conducted at the University of Guelph must follow the ethical principles and articles outlined within the TCPS2 (the Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans).

Research involving human subjects can be ethically justified only when:

- The research is scientifically sound
- The potential benefit significantly outweighs the potential for harm
- There is an adequate process for informed consent, and assent where applicable
- There is justice or fairness in selection of participants

Thus, when assessing whether a proposal meets the ethical requirements for research involving humans, the REB focuses on the following five elements: methodology, selection and recruitment, the informed consent process, potential harms and benefits, and privacy and confidentiality.

The TCPS2 also calls for a 'proportionate approach' to REB review, noting that "the intention is to ensure adequate protection of participants is maintained while reducing unnecessary impediments to, and facilitating the progress of, ethical research."

Q27 Considering the principles outlined in the TCPS2, please indicate the extent to which you agree or disagree with the following statements.

| | Strongly Disagree | Somewhat disagree | Neither agree nor disagree | Somewhat agree | Strongly agree |
|--|-----------------------|-----------------------|----------------------------|-----------------------|-----------------------|
| The materials required as part of the initial REB application are limited to only what is needed to ensure the ethical conduct of research | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| The feedback that I received from the REB on my initial application(s) identified only those changes that were necessary in order for my research to comply with the principles of the TCPS2 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| In using my REB-approved materials (e.g. consent forms) during research, I have encountered ethical challenges that have been created by the requirements of the REB. | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| The REB process at the University of Guelph facilitates the progress of ethical research | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

REB processes
are intended to
limit the
university's
liability in
research
contexts

Q28 If you wish, please elaborate on the reasons behind your responses to the statements above (e.g. specific experiences with REB applications/feedback)

End of Block: REB Process/Experience

Start of Block: Faculty specific

Q29 Have you ever amended an approved REB protocol to fit a new purpose, rather than start a new application, because of significant overlap in the purpose and methods?

Yes

No

Q30 When preparing a new REB application, how often do you reuse significant portions of a previously approved application? (e.g. description of methods, consent form text)

- Never
- Sometimes
- About half the time
- Most of the time
- Always
- Not applicable

Display This Question:

*If When preparing a new REB application, how often do you reuse significant portions of a previously... =
Sometimes*

*Or When preparing a new REB application, how often do you reuse significant portions of a previously... =
About half the time*

*Or When preparing a new REB application, how often do you reuse significant portions of a previously... =
Most of the time*

*Or When preparing a new REB application, how often do you reuse significant portions of a previously... =
Always*

Q31 When you reuse material from past REB applications, how often are you asked to change something that was previously approved?

- Never
- Sometimes
- About half the time
- Most of the time
- Always

End of Block: Faculty specific

Start of Block: Support and Solutions

Q32 Did you seek any support or advice while you were preparing your most recent REB application?

Yes

No

Display This Question:

If Did you seek any support or advice while you were preparing your most recent REB application? = Yes

Q33 Where did you seek advice or support for your most recent REB application? Please check all that apply

I consulted with a colleague, advisor, or fellow student (e.g. asked questions, reviewed their REB materials)

I consulted with the REB manager

I consulted the REB website (e.g. the consent checklist)

I attended an REB Brown Bag lunch

Display This Choice:

If In your current role, which College or unit are you affiliated with? = College of Social and Applied Human Sciences (CSAHS)

I consulted with the CSAHS REB support person

Other _____

Display This Question:

If Did you seek any support or advice while you were preparing your most recent REB application? = No

Q34 If you did not seek support or advice on your most recent REB application, why not?

- I did not have any questions
 - I did not know who to ask
 - I have sought advice in the past and found it unhelpful
 - I did not want to wait for help and further delay submission of my application
 - Other _____
-

Q35 How would you characterize the resources available to support the preparation of REB applications?

- Not at all useful
 - Slightly useful
 - Moderately useful
 - Very useful
 - Extremely useful
 - Not sure
-

Page Break _____

Q36 The goal of the REB Working Group is to identify specific recommendations that could help to improve the REB process for everyone involved. Please indicate how useful you would find the following tools or resources.

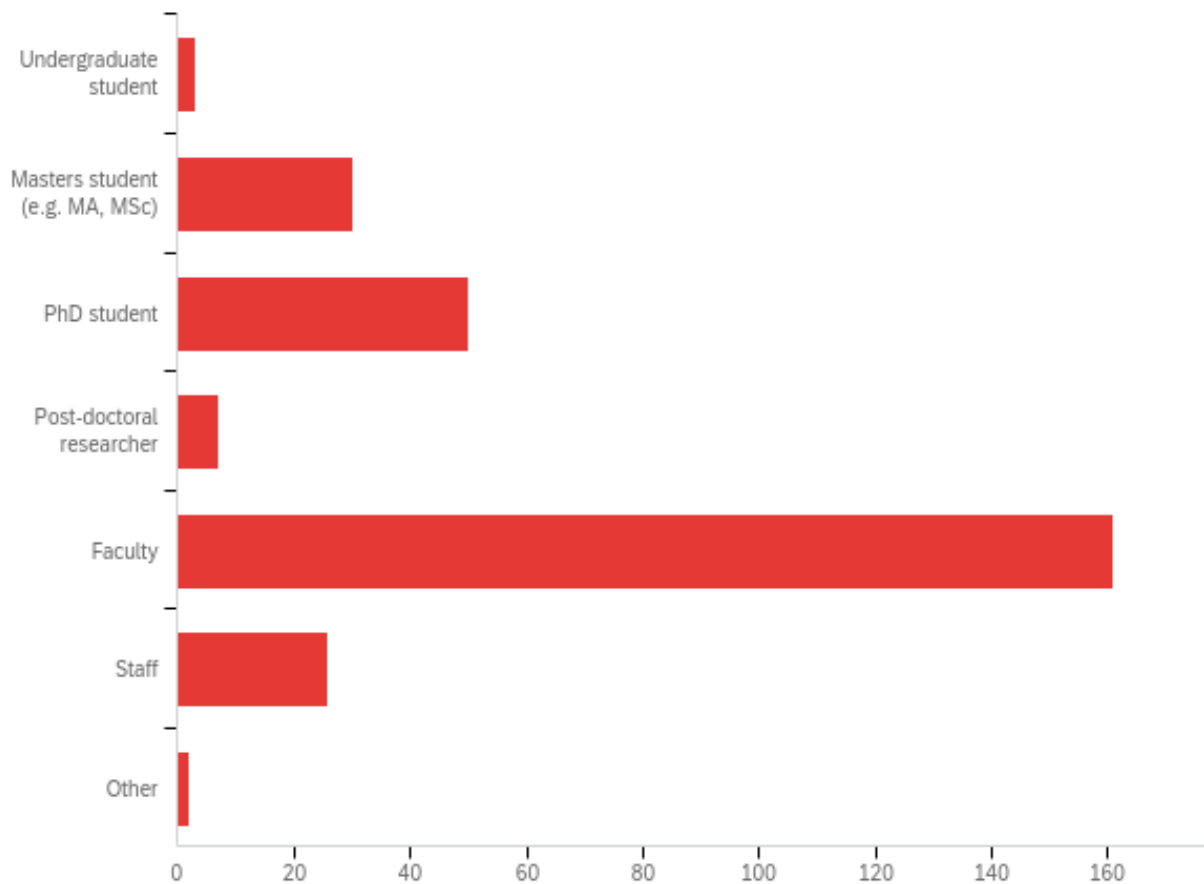
| | Not at all useful | Slightly useful | Moderately useful | Very useful | Extremely useful |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Electronic submission system (in place of Word document/email submission) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Online repository of previously approved protocols (including SOPs, CORE certificates, etc) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Online and/or in-person course on how to successfully navigate the REB submission process | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Speaking to REB about your application – before review (e.g. 30-min video call, phone call) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Speaking to REB about your application – during review (e.g. 30-min video call, phone call) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Instructional videos to guide your writing of the REB application | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Approved/standard language for consent forms | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Q37 Is there anything else that you think would help to improve the REB process at the University of Guelph?

End of Block: Support and Solutions

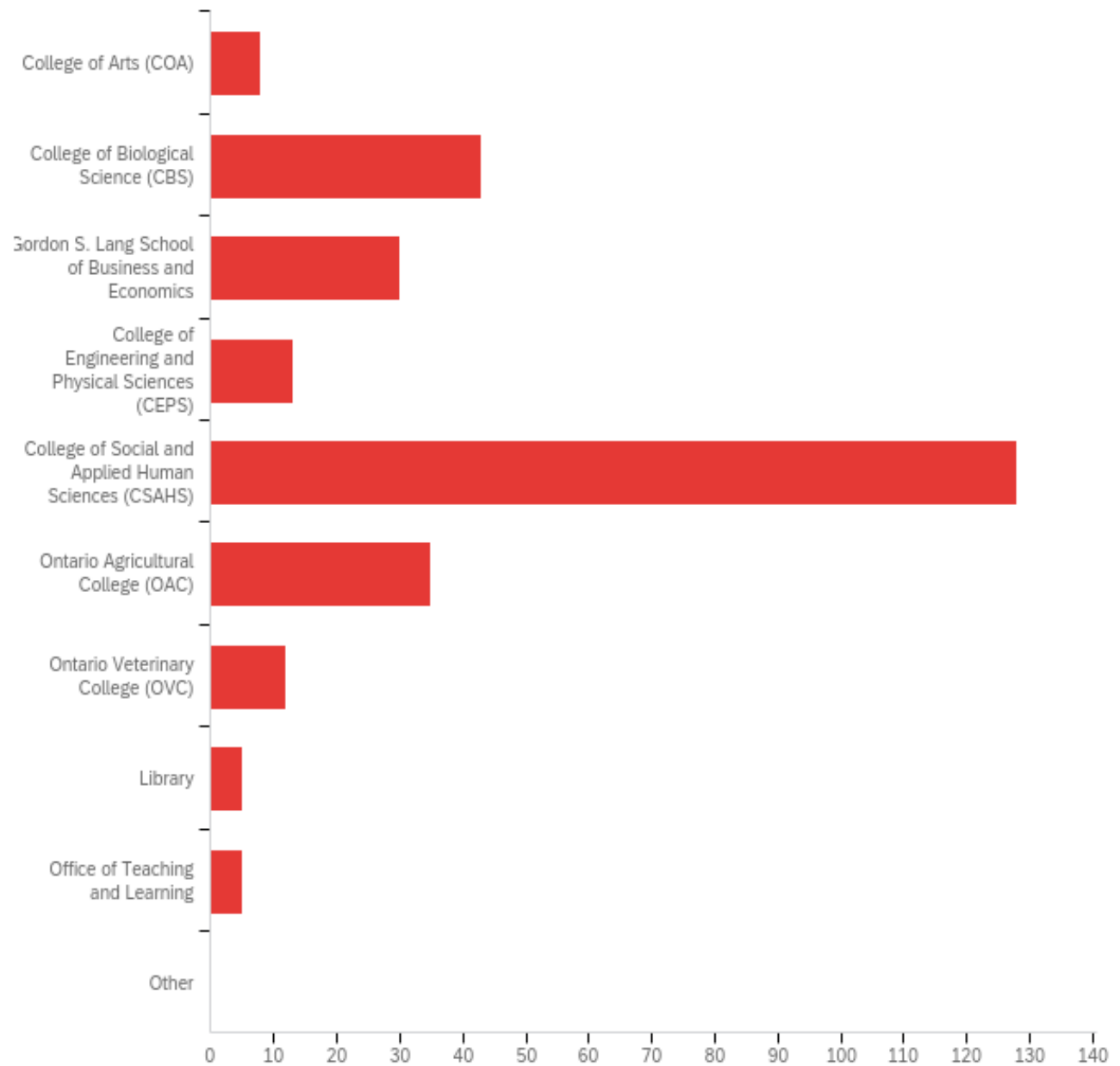
Appendix 2: Survey Data

Q2 - What is your current role at the University of Guelph?



| Answer | % | Count |
|--------------------------------|--------|-------|
| Undergraduate student | 1.08% | 3 |
| Masters student (e.g. MA, MSc) | 10.75% | 30 |
| PhD student | 17.92% | 50 |
| Post-doctoral researcher | 2.51% | 7 |
| Faculty | 57.71% | 161 |
| Staff | 9.32% | 26 |
| Other | 0.72% | 2 |
| Total | 100% | 279 |

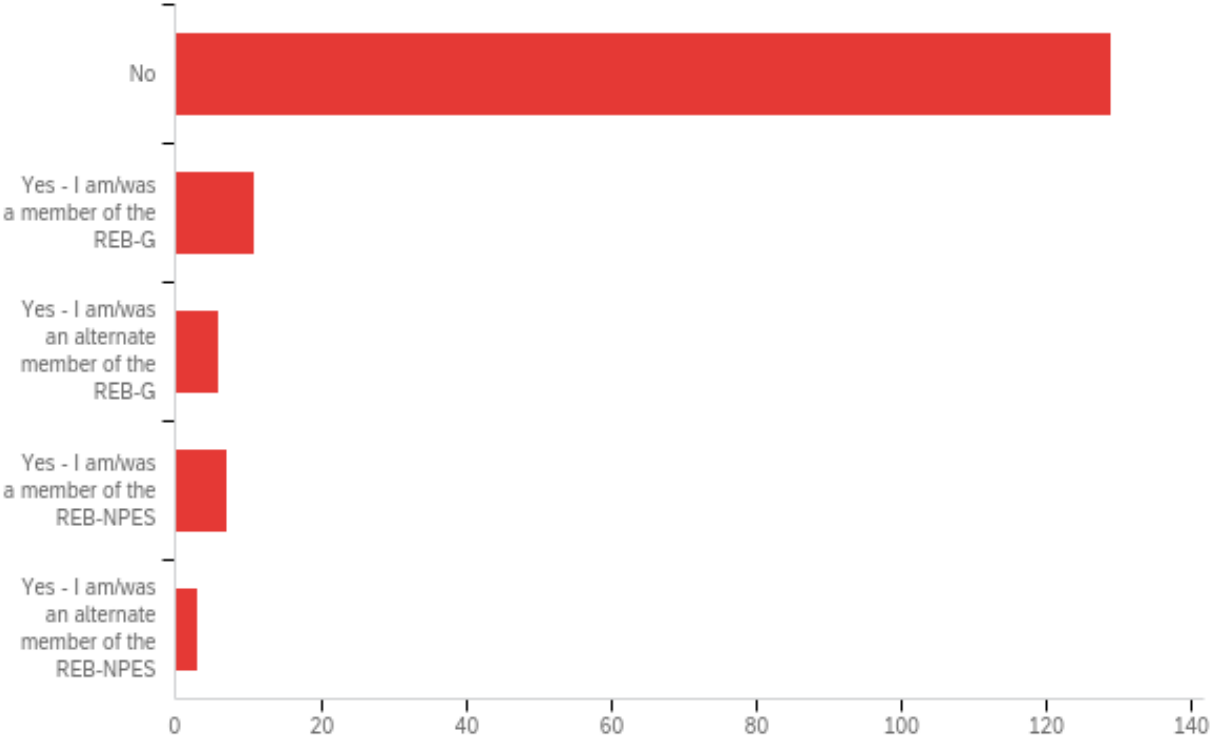
Q3 - In your current role, which College or unit are you affiliated with?



| Answer | % | Count |
|--|--------|-------|
| College of Arts (COA) | 2.87% | 8 |
| College of Biological Science (CBS) | 15.41% | 43 |
| Gordon S. Lang School of Business and Economics | 10.75% | 30 |
| College of Engineering and Physical Sciences (CEPS) | 4.66% | 13 |
| College of Social and Applied Human Sciences (CSAHS) | 45.88% | 128 |
| Ontario Agricultural College (OAC) | 12.54% | 35 |
| Ontario Veterinary College (OVC) | 4.30% | 12 |
| Library | 1.79% | 5 |
| Office of Teaching and Learning | 1.79% | 5 |
| Other | 0.00% | 0 |
| Total | 100% | 279 |

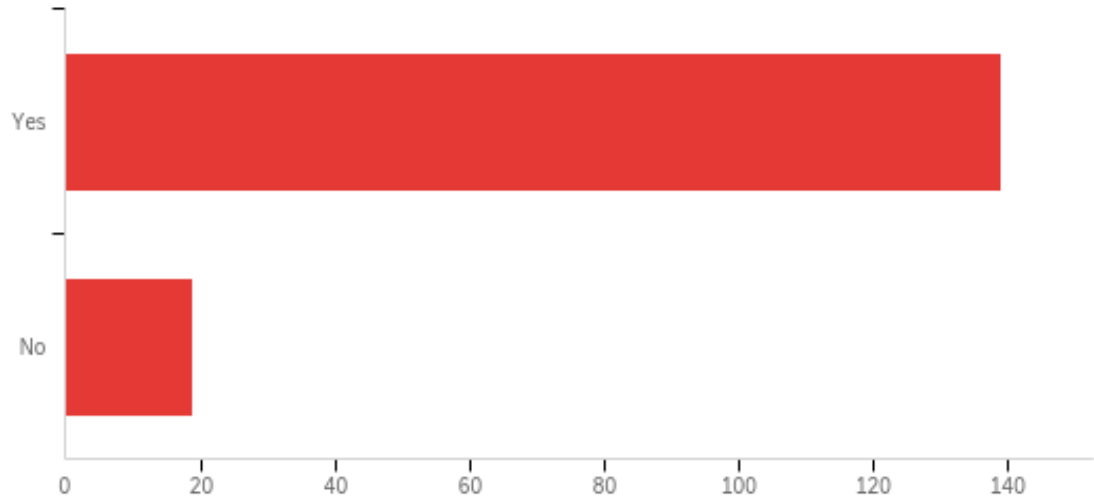
Q4-Q10: *Departmental level responses were removed b/c of low response rates in some units.

Q11 - Have you ever served as a member of the REB at the University of Guelph?



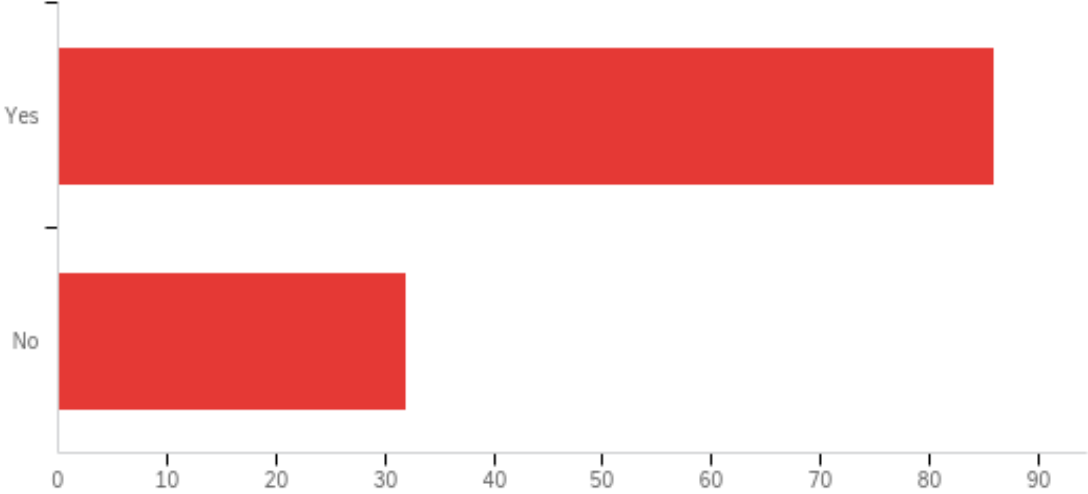
| Answer | % | Count |
|--|-------------|------------|
| No | 82.69% | 129 |
| Yes - I am/was a member of the REB-G | 7.05% | 11 |
| Yes - I am/was an alternate member of the REB-G | 3.85% | 6 |
| Yes - I am/was a member of the REB-NPES | 4.49% | 7 |
| Yes - I am/was an alternate member of the REB-NPES | 1.92% | 3 |
| Total | 100% | 156 |

Q12 - Have you submitted at least one REB application in the past three years, as the PI?



| Answer | % | Count |
|--------|--------|-------|
| Yes | 87.97% | 139 |
| No | 12.03% | 19 |
| Total | 100% | 158 |

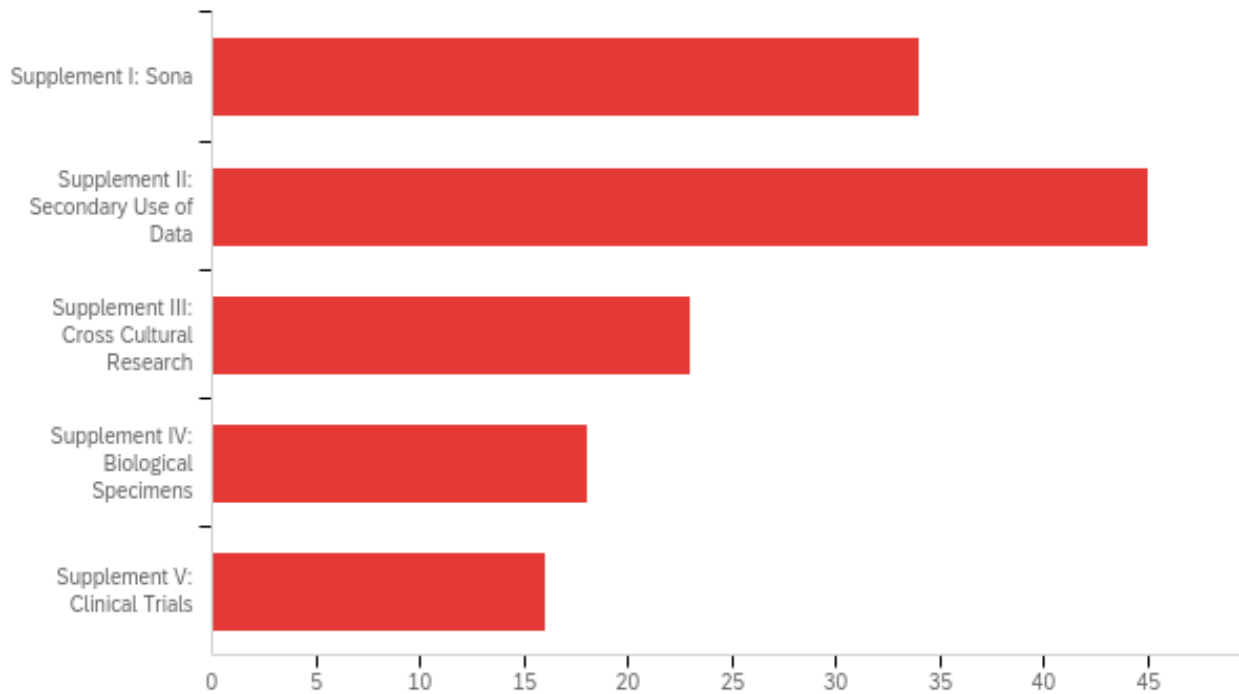
Q13 - While faculty must submit REB applications as the PI, in many cases they do so on behalf of graduate students, postdoctoral researchers, or other members of the campus community. Have you helped to prepare at least one REB application in the past three years, which was related to your own research? (e.g. for your thesis/dissertation, postdoctoral research)



| Answer | % | Count |
|--------|--------|-------|
| Yes | 72.88% | 86 |
| No | 27.12% | 32 |
| Total | 100% | 118 |

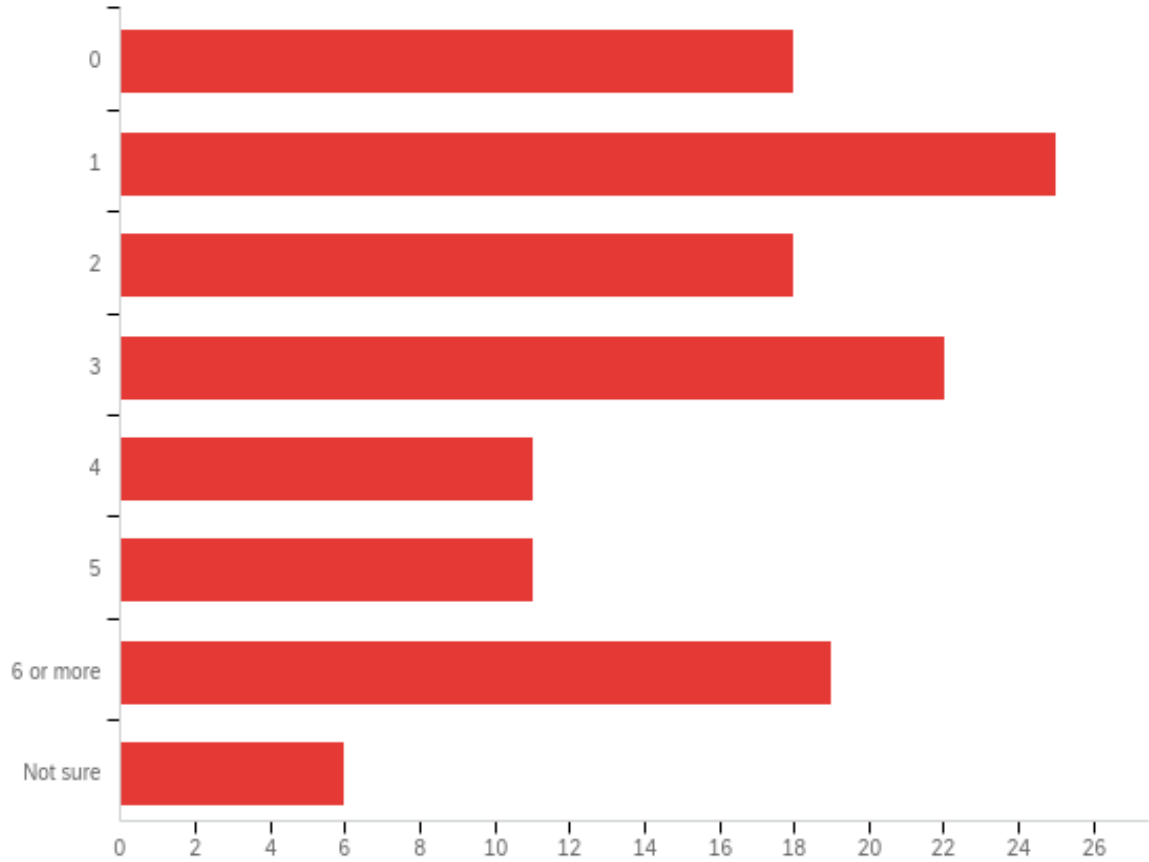
*Respondents who answered ‘No’ to both Q12 and Q13 were directed to the end of the survey. The purpose was to ensure that respondents had recent experience with the REB application process.

Q14 - Consider the REB application(s) that you have submitted in the past three years. Did it/they include any of the following supplements? Please check all that apply.



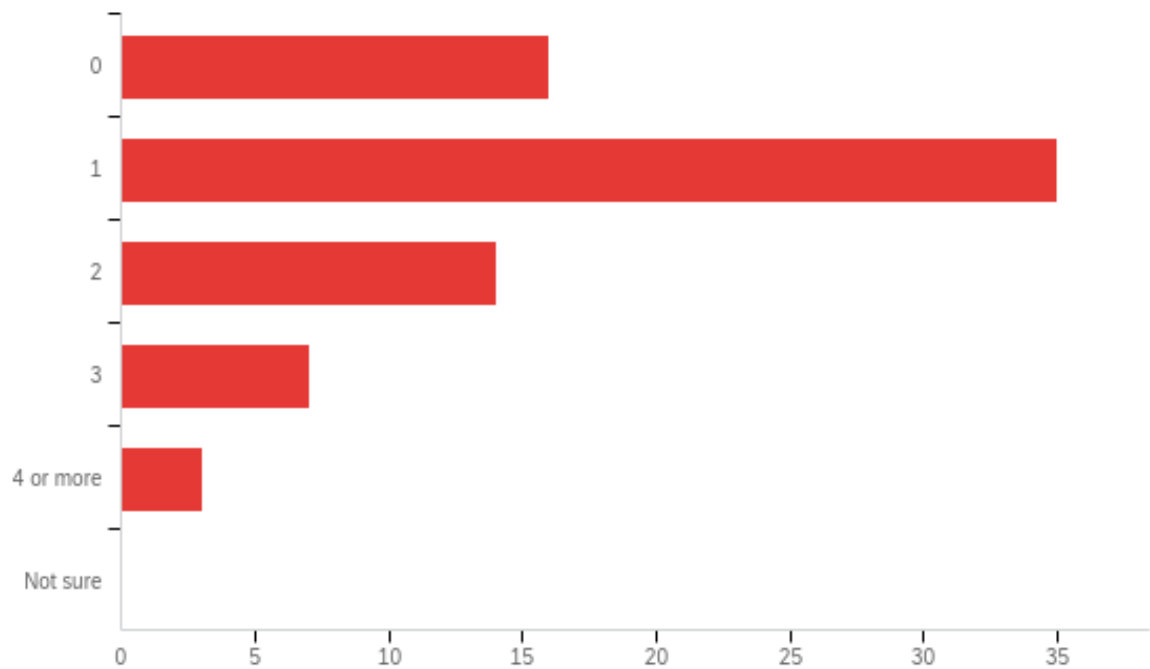
| Answer | % | Count |
|---|--------|-------|
| Supplement I: Sona | 25.00% | 34 |
| Supplement II: Secondary Use of Data | 33.09% | 45 |
| Supplement III: Cross Cultural Research | 16.91% | 23 |
| Supplement IV: Biological Specimens | 13.24% | 18 |
| Supplement V: Clinical Trials | 11.76% | 16 |
| Total | 100% | 136 |

Q16 - How many open REB protocols do you have currently? (An open REB protocol refers to research that has been approved by the REB, for which you have been provided a certificate of approval, and that is still ongoing). Consider all open protocols that list you as PI.



| Answer | % | Count |
|-----------|--------|-------|
| 0 | 13.85% | 18 |
| 1 | 19.23% | 25 |
| 2 | 13.85% | 18 |
| 3 | 16.92% | 22 |
| 4 | 8.46% | 11 |
| 5 | 8.46% | 11 |
| 6 or more | 14.62% | 19 |
| Not sure | 4.62% | 6 |
| Total | 100% | 130 |

Q17 - How many open REB protocols do you have currently? (An open REB protocol refers to research that has been approved by the REB, for which you have been provided a certificate of approval, and that is still ongoing). Consider only open protocols that relate to your own research (e.g. thesis/dissertation, postdoctoral).



| Answer | % | Count |
|-----------|--------|-------|
| 0 | 21.33% | 16 |
| 1 | 46.67% | 35 |
| 2 | 18.67% | 14 |
| 3 | 9.33% | 7 |
| 4 or more | 4.00% | 3 |
| Not sure | 0.00% | 0 |
| Total | 100% | 75 |

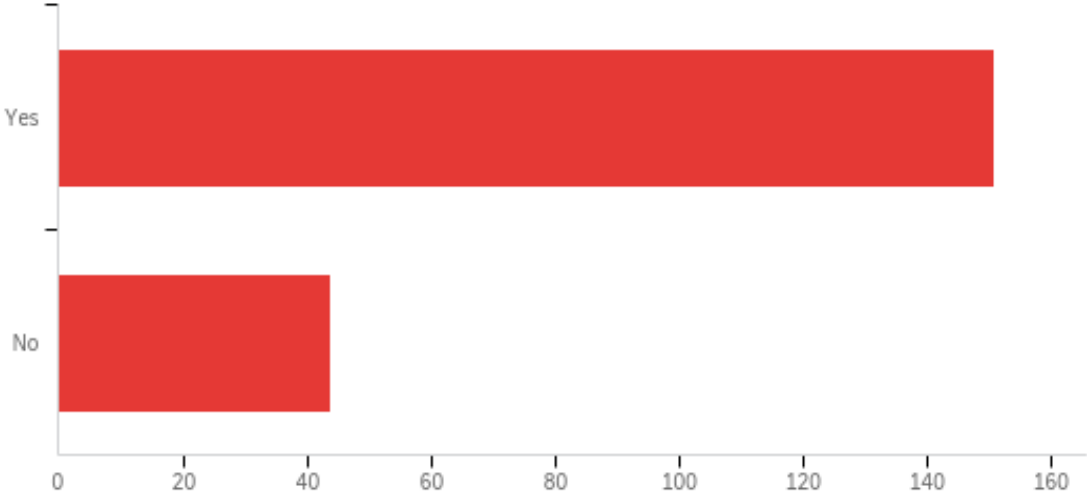
Q18 - Approximately how many hours did it take to prepare the initial submission for your most recent REB application? If others also worked on the application, consider only the hours you worked.

| | Minimum | Maximum | Mean | Std Deviation | Variance | Count |
|--|---------|---------|-------|------------------|----------|-------|
| Approximately how many hours did it take to prepare the initial submission for your most recent REB application? If others also worked on the application, consider only the hours you worked. | 1.00 | 100.00 | 16.28 | 15.08 | 227.36 | 189 |

Q20 - After receiving initial feedback from the REB, how many hours did it take to revise your application for resubmission? Again, please consider only the hours you worked yourself.

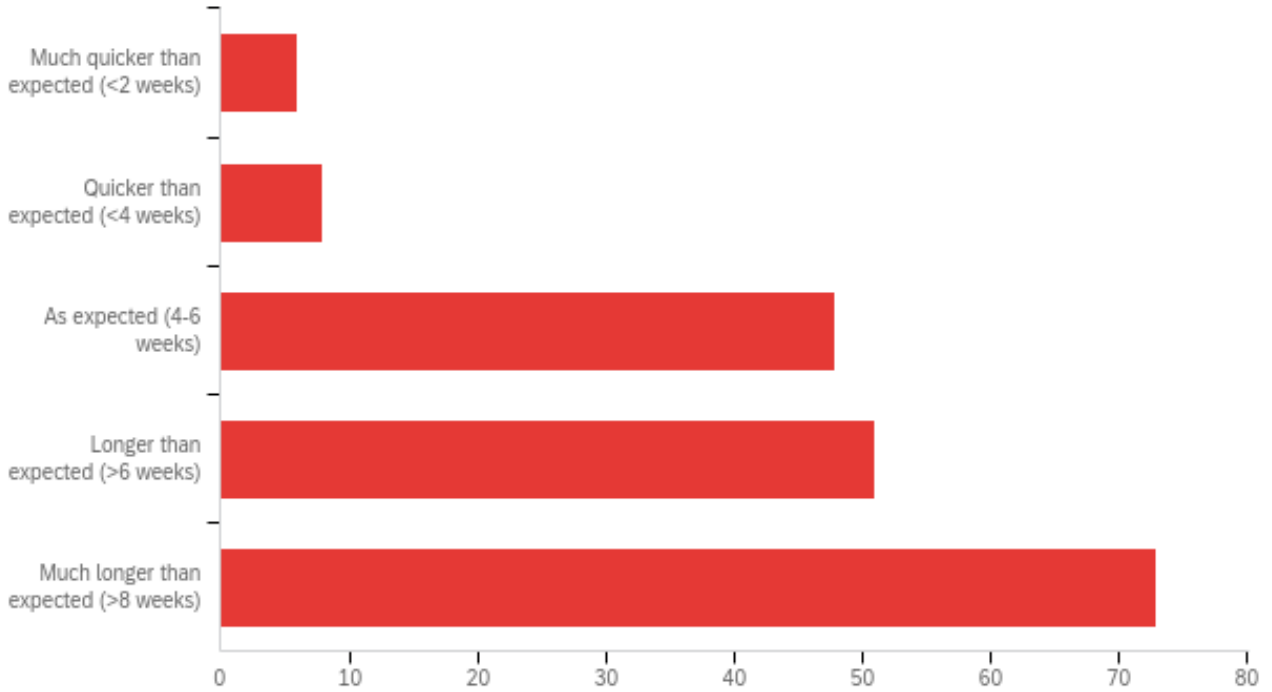
| Field | Minimum | Maximum | Mean | Std Deviation | Variance | Count |
|---|---------|---------|------|------------------|----------|-------|
| After receiving initial feedback from the REB, how many hours did it take to revise your application for resubmission? Again, please consider only the hours you worked yourself. | 0.00 | 150.00 | 6.60 | 12.51 | 156.42 | 185 |

Q19 - Did anyone else spend time helping you to prepare your most recent REB application?



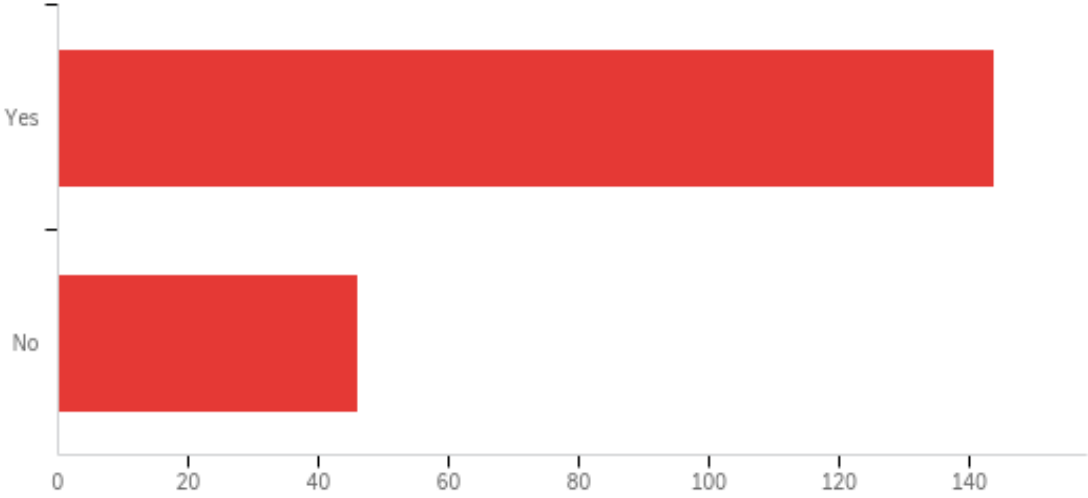
| Answer | % | Count |
|--------|--------|-------|
| Yes | 77.44% | 151 |
| No | 22.56% | 44 |
| Total | 100% | 195 |

Q21 - The REB website indicates that the approval process “will take four to six weeks, depending on the complexity and quality of the submission.” Given this, how would you characterize the timeline of the approval process for your most recent REB submission?



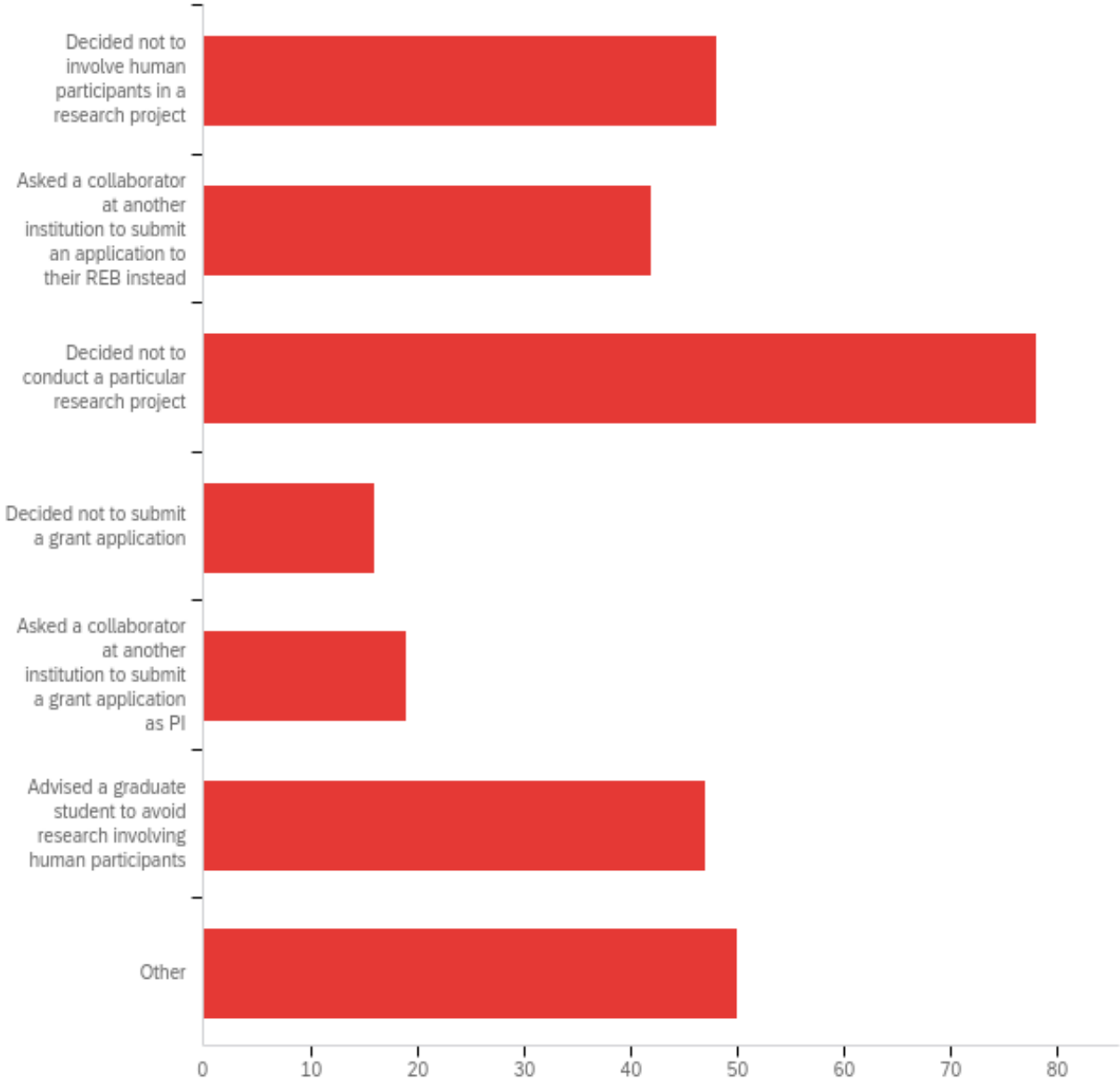
| Answer | % | Count |
|---------------------------------------|--------|-------|
| Much quicker than expected (<2 weeks) | 3.23% | 6 |
| Quicker than expected (<4 weeks) | 4.30% | 8 |
| As expected (4-6 weeks) | 25.81% | 48 |
| Longer than expected (>6 weeks) | 27.42% | 51 |
| Much longer than expected (>8 weeks) | 39.25% | 73 |
| Total | 100% | 186 |

Q24 - In the past three years, have you ever altered your research plans in anticipation of a lengthy REB review process at the University of Guelph?



| Answer | % | Count |
|--------|--------|-------|
| Yes | 75.79% | 144 |
| No | 24.21% | 46 |
| Total | 100% | 190 |

Q25 - If yes, which of the following approaches have you used to adapt your research plans? Please check all that apply. (Please consider only those changes related to REB review timelines, rather than COVID challenges, etc).



| Answer | % | Count |
|---|--------|-------|
| Decided not to involve human participants in a research project | 16.00% | 48 |
| Asked a collaborator at another institution to submit an application to their REB instead | 14.00% | 42 |
| Decided not to conduct a particular research project | 26.00% | 78 |
| Decided not to submit a grant application | 5.33% | 16 |
| Asked a collaborator at another institution to submit a grant application as PI | 6.33% | 19 |
| Advised a graduate student to avoid research involving human participants | 15.67% | 47 |
| Other | 16.67% | 50 |
| Total | 100% | 300 |

Q25_7_TEXT - Other

Other - Text

Undergraduate teaching. Changed focus of the assignment

submitted an REB application before the research design was completed determined (this way, we can keep refining research design and procedures while waiting 6-8 weeks for REB to deliver a review; otherwise, we, especially, grad students, would waste 4-6 weeks, not being able to do anything while waiting for REB review)

Did not do the research.

Advised an undergrad to do a different project

changed measures or procedures

adapted a protocol/methodology in anticipation of a difficult review process

Advised a graduate student that we needed to come up with a more feasible plan to account for the REB review time

Delayed the start of research

Made REB application more general to avoid having to submit multiple amendments

Submitted much earlier before proposal had been approved

Changed research methods for a project

Completely altered research plans as the forms are frustratingly long

delayed start date

Changed the research design

Changed timeline for data collection

Submitted more than I needed so I could decide what to use while waiting for REB

delayed data collection

Struck advisory committee rather than conducting generalized research to inform tools created

Combined protocols

prioritized finishing an REB over publication of existing work

decided not to conduct part of the research with human participants abroad

did not use a specific population of human participants

avoided specific things like honorarium, non-anonymous research etc. even when they would be better ethically.

extended the timeline for my project by one year in anticipation of missing semesterly deadlines for interviews

Decided not to make changes that would have made some aspects of my project easier but which would have required a lengthy amendment process.

Decided not to improve a research project because it would require changes that would need an amendment to an approved REB

Changed methods in hopes of making the REB process more manageable

Had to move forward with another project to finished degree on time

Chose a less sensitive topic because I knew full board review would take too long

shifted timelines

Project was planned as MSc thesis and had to be rolled into a PhD. While this worked out in the end, the REB review process would have prevented me from completing my MSc research in my allotted funding period had I not continued into a PhD

Altered timelines for other projects to compensate.

conducted different work in order to avoid research at all

altered components; looked for ways to avoid REB

changed recruitment plan

Decided against total sleep deprivation and used partial sleep deprivation instead

Modifications to other research projects already approved

Conducted research over multiple semesters instead of over 1 semester

Pushed start date back 1 semester

encouraged an undergraduate student to tag on to another project because there was no way we could do their proposed project in time for a two semester course

Delayed acceptance of a grant.

Modified the design of the study

Currently avoiding starting new research that involves human participants

Advised a graduate student to remove some research approaches to facilitate a faster process. Did not do an amendment to do research during COVID (suspended data collection instead).

Advised undergraduate honours thesis students to avoid research involving human participants

timelines

Split the qualitative & quantitative components to decrease complexity - completed them in separate applications to ensure I could start on one component while doing the next for REB

Changed survey questions and incentives

Q27 - Considering the principles outlined in the TCPS2, please indicate the extent to which you agree or disagree with the following statements.

| Question | Strongly Disagree | | Somewhat disagree | | Neither agree nor disagree | | Somewhat agree | | Strongly agree | | Total |
|--|-------------------|----|-------------------|----|----------------------------|----|----------------|----|----------------|----|-------|
| The materials required as part of the initial REB application are limited to only what is needed to ensure the ethical conduct of research | 18.68% | 34 | 29.67% | 54 | 12.09% | 22 | 27.47% | 50 | 12.09% | 22 | 182 |
| The feedback that I received from the REB on my initial application(s) identified only those changes that were necessary in order for my research to comply with the principles of the TCPS2 | 24.86% | 45 | 29.83% | 54 | 12.15% | 22 | 22.10% | 40 | 11.05% | 20 | 181 |
| In using my REB-approved materials (e.g. consent forms) during research, I | 32.60% | 59 | 15.47% | 28 | 20.44% | 37 | 20.99% | 38 | 10.50% | 19 | 181 |

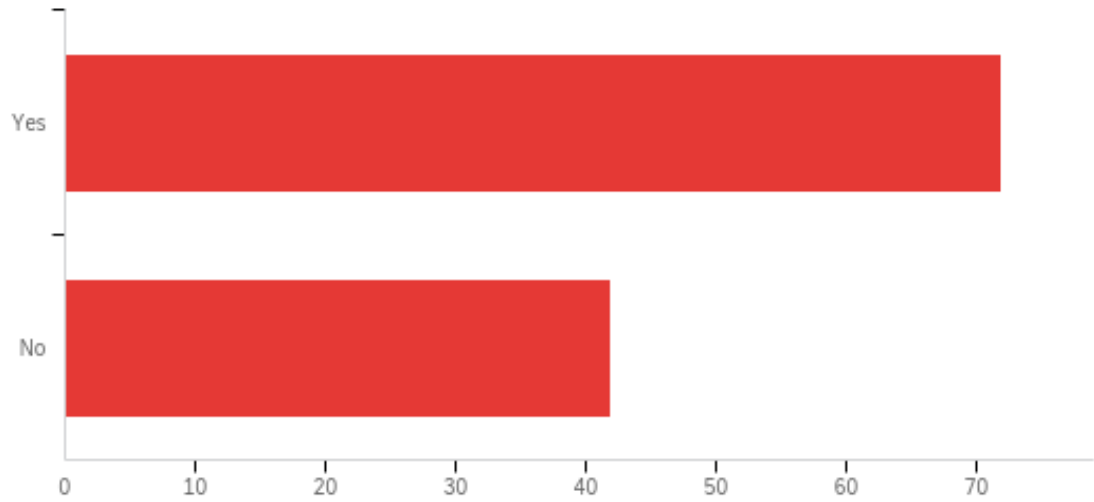
| | | | | | | | | | | | |
|--|--------|----|--------|----|--------|----|--------|----|--------|----|-----|
| have encountered ethical challenges that have been created by the requirements of the REB. | | | | | | | | | | | |
| The REB process at the University of Guelph facilitates the progress of ethical research | 17.58% | 32 | 24.73% | 45 | 19.23% | 35 | 26.92% | 49 | 11.54% | 21 | 182 |
| REB processes are intended to limit the university's liability in research contexts | 4.00% | 7 | 1.14% | 2 | 17.71% | 31 | 36.00% | 63 | 41.14% | 72 | 175 |

| # | Field | Minimum | Maximum | Mean | Std Deviation | Variance | Count |
|---|--|---------|---------|------|---------------|----------|-------|
| 1 | The materials required as part of the initial REB application are limited to only what is needed to ensure the ethical conduct of research | 1.00 | 5.00 | 2.85 | 1.33 | 1.78 | 182 |
| 2 | The feedback that I received from the REB on my initial application(s) identified only those changes that were necessary in order for my research to comply with the principles of the TCPS2 | 1.00 | 5.00 | 2.65 | 1.35 | 1.83 | 181 |
| 3 | In using my REB-approved materials (e.g. consent forms) during research, I have encountered ethical challenges that have been created by the requirements of the REB. | 1.00 | 5.00 | 2.61 | 1.39 | 1.94 | 181 |
| 4 | The REB process at the University of Guelph facilitates the progress of ethical research | 1.00 | 5.00 | 2.90 | 1.29 | 1.67 | 182 |
| 5 | REB processes are intended to limit the university's liability in research contexts | 1.00 | 5.00 | 4.09 | 0.99 | 0.99 | 175 |

Q28 - If you wish, please elaborate on the reasons behind your responses to the statements above (e.g. specific experiences with REB applications/feedback)

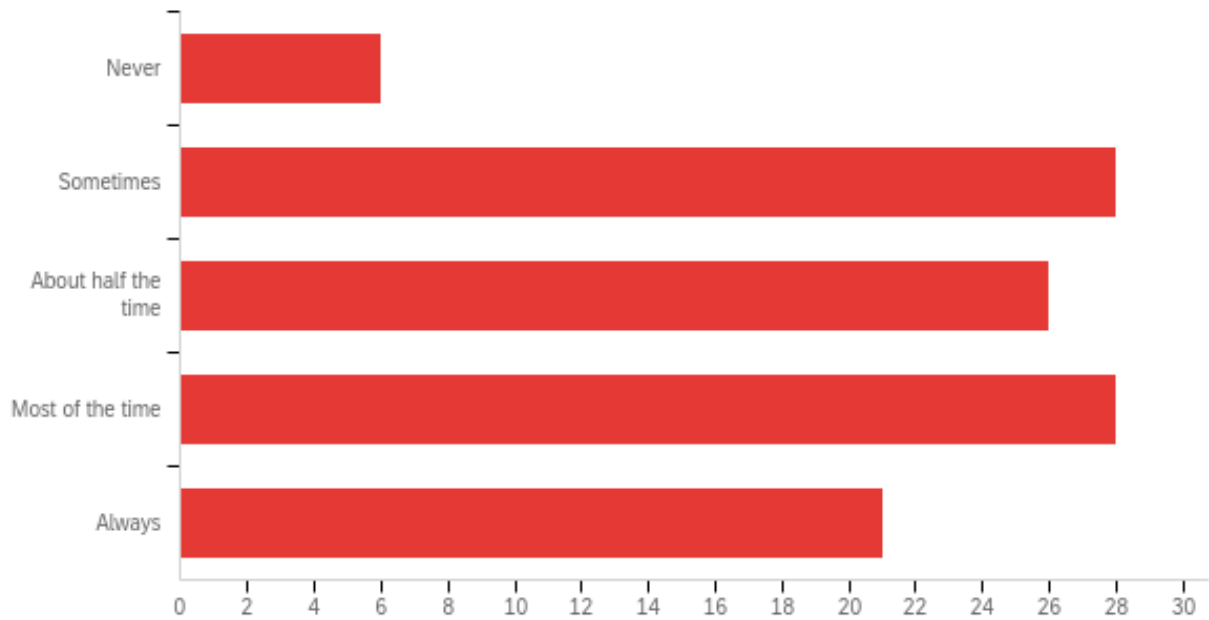
Representative quotations from open-ended responses are included throughout the report

Q29 - Have you ever amended an approved REB protocol to fit a new purpose, rather than start a new application, because of significant overlap in the purpose and methods?



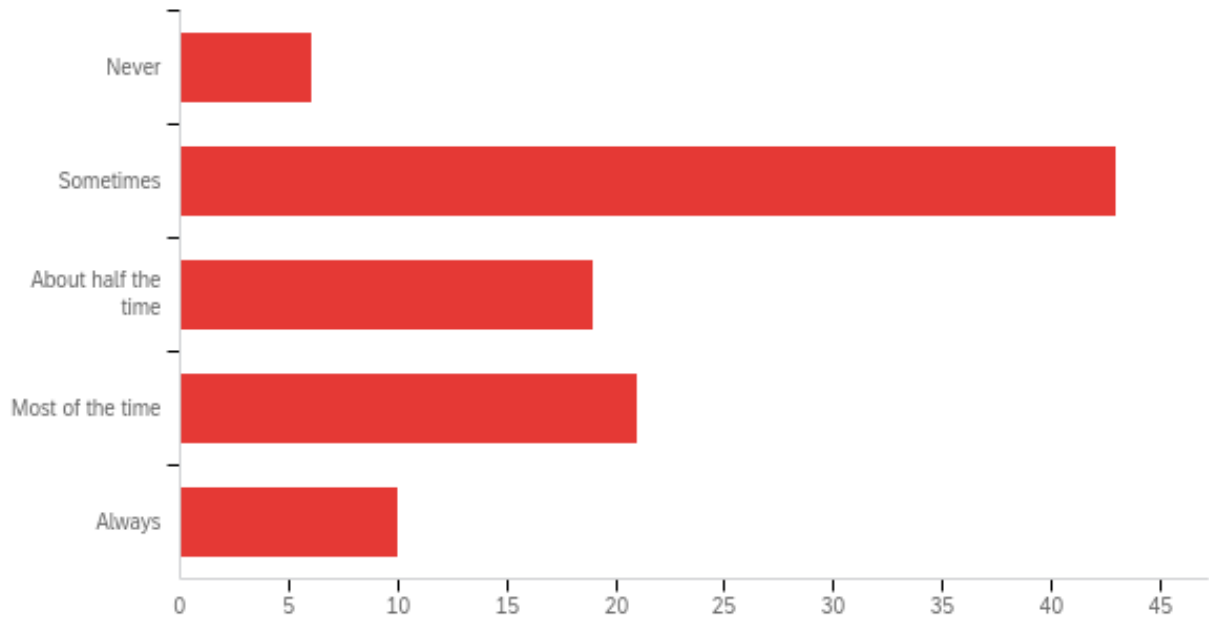
| Answer | % | Count |
|--------|--------|-------|
| Yes | 63.16% | 72 |
| No | 36.84% | 42 |
| Total | 100% | 114 |

Q30 - When preparing a new REB application, how often do you reuse significant portions of a previously approved application? (e.g. description of methods, consent form text)



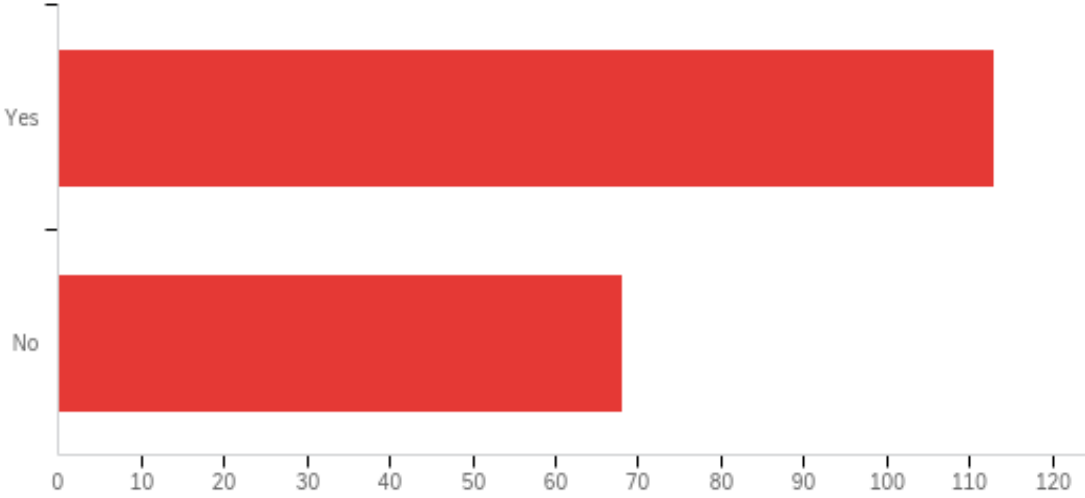
| Answer | % | Count |
|---------------------|--------|-------|
| Never | 5.50% | 6 |
| Sometimes | 25.69% | 28 |
| About half the time | 23.85% | 26 |
| Most of the time | 25.69% | 28 |
| Always | 19.27% | 21 |
| Total | 100% | 109 |

Q31 - When you reuse material from past REB applications, how often are you asked to change something that was previously approved?



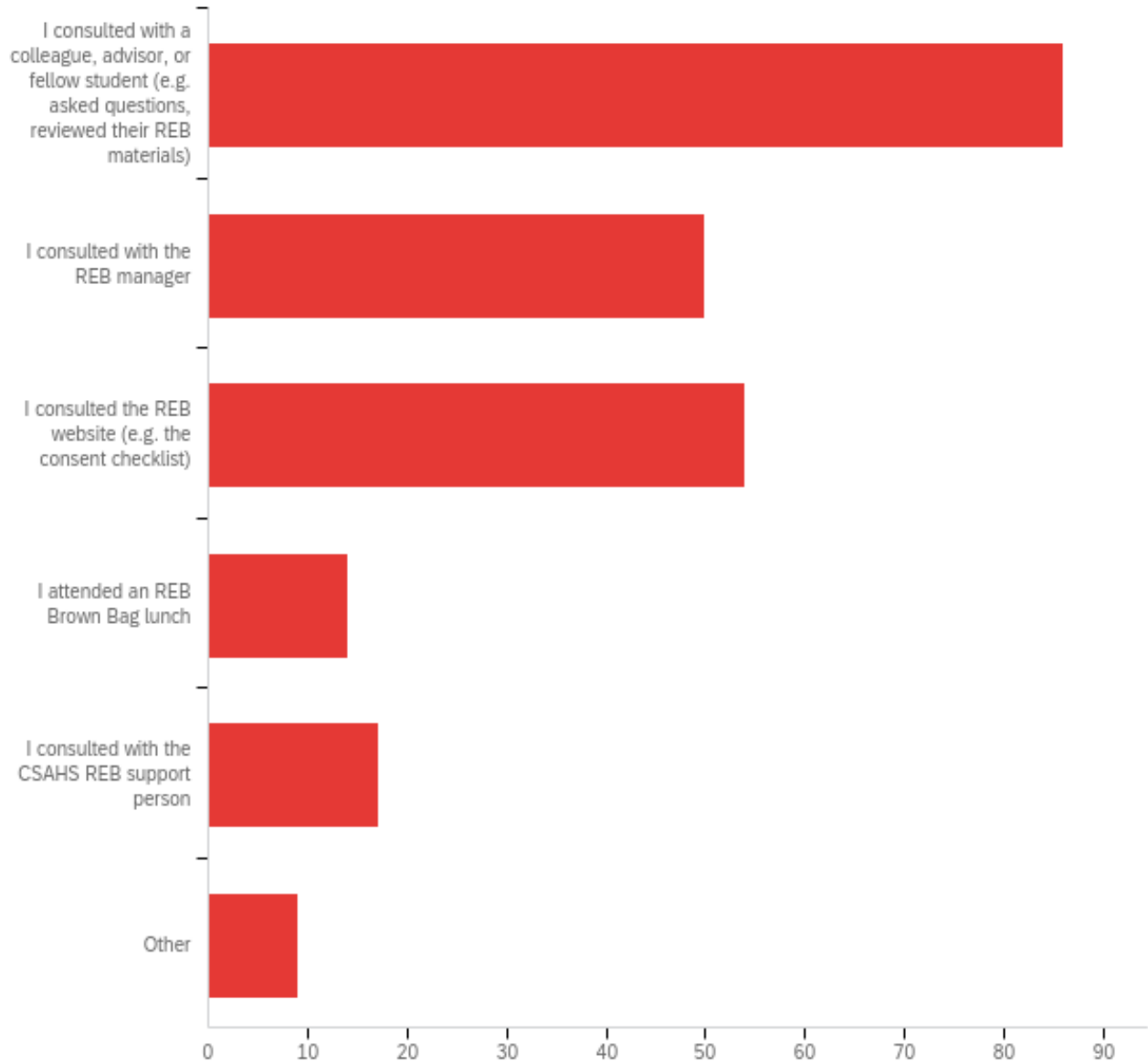
| Answer | % | Count |
|---------------------|--------|-------|
| Never | 6.06% | 6 |
| Sometimes | 43.43% | 43 |
| About half the time | 19.19% | 19 |
| Most of the time | 21.21% | 21 |
| Always | 10.10% | 10 |
| Total | 100% | 99 |

Q32 - Did you seek any support or advice while you were preparing your most recent REB application?



| Answer | % | Count |
|--------|--------|-------|
| Yes | 62.43% | 113 |
| No | 37.57% | 68 |
| Total | 100% | 181 |

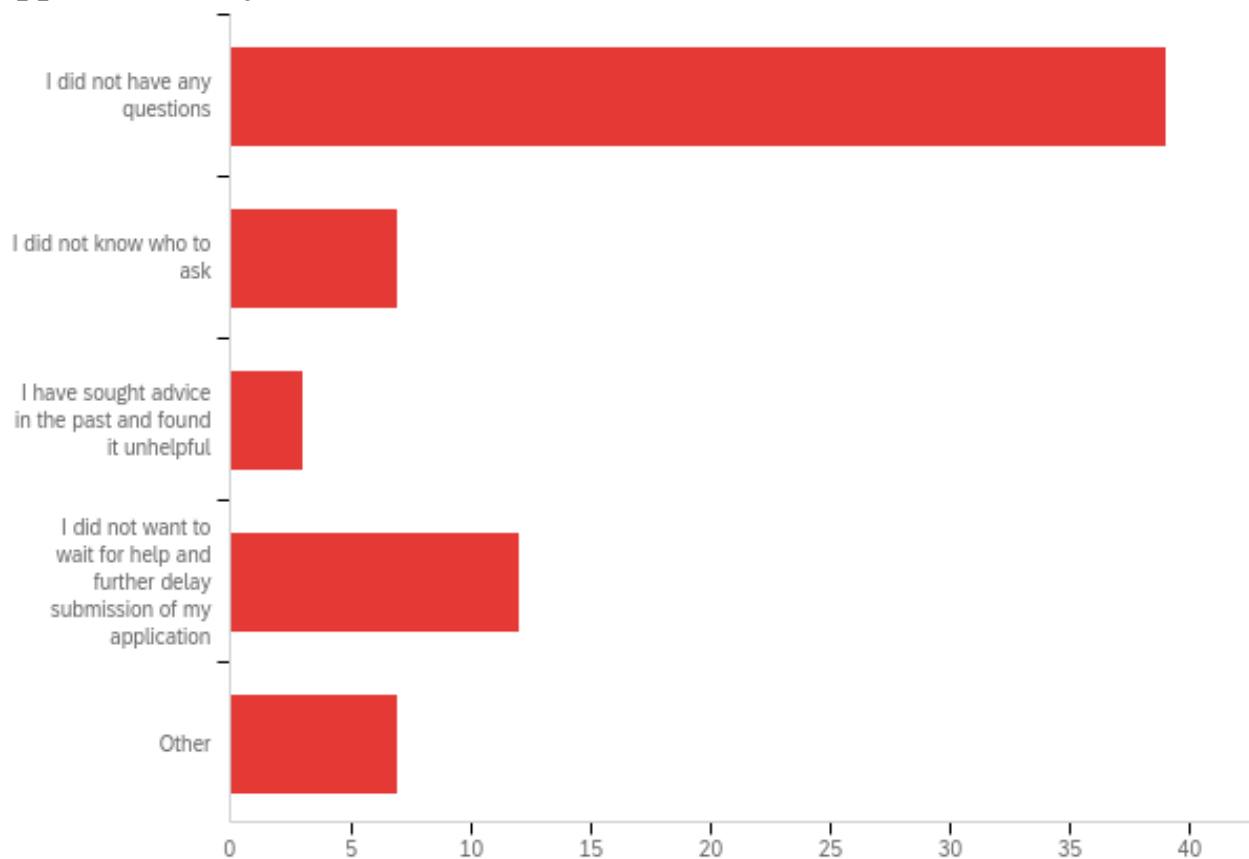
Q33 - Where did you seek advice or support for your most recent REB application? Please check all that apply



| Answer | % | Count |
|---|--------|-------|
| I consulted with a colleague, advisor, or fellow student (e.g. asked questions, reviewed their REB materials) | 37.39% | 86 |
| I consulted with the REB manager | 21.74% | 50 |
| I consulted the REB website (e.g. the consent checklist) | 23.48% | 54 |
| I attended an REB Brown Bag lunch | 6.09% | 14 |
| I consulted with the CSAHS REB support person | 7.39% | 17 |

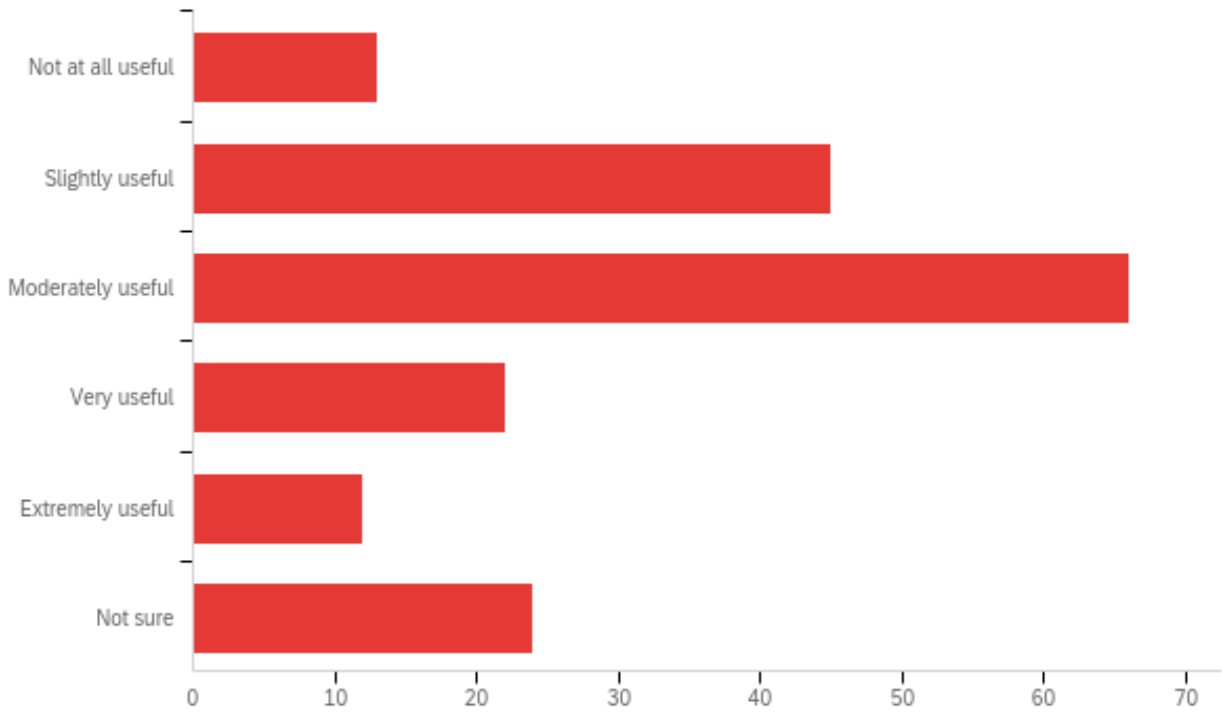
| | | |
|-------|-------|-----|
| Other | 3.91% | 9 |
| Total | 100% | 230 |

Q34 - If you did not seek support or advice on your most recent REB application, why not?



| Answer | % | Count |
|--|--------|-------|
| I did not have any questions | 57.35% | 39 |
| I did not know who to ask | 10.29% | 7 |
| I have sought advice in the past and found it unhelpful | 4.41% | 3 |
| I did not want to wait for help and further delay submission of my application | 17.65% | 12 |
| Other | 10.29% | 7 |
| Total | 100% | 68 |

Q35 - How would you characterize the resources available to support the preparation of REB applications?



| Answer | % | Count |
|-------------------|--------|-------|
| Not at all useful | 7.14% | 13 |
| Slightly useful | 24.73% | 45 |
| Moderately useful | 36.26% | 66 |
| Very useful | 12.09% | 22 |
| Extremely useful | 6.59% | 12 |
| Not sure | 13.19% | 24 |
| Total | 100% | 182 |

Q36 - The goal of the REB Working Group is to identify specific recommendations that could help to improve the REB process for everyone involved. Please indicate how useful you would find the following tools or resources.

| Question | Not at all useful | | Slightly useful | | Moderately useful | | Very useful | | Extremely useful | | Total |
|---|-------------------|----|-----------------|----|-------------------|----|-------------|----|------------------|----|-------|
| Electronic submission system (in place of Word document/email submission) | 10.50% | 19 | 6.63% | 12 | 15.47% | 28 | 28.18% | 51 | 39.23% | 71 | 181 |
| Online repository of previously approved protocols (including SOPs, CORE certificates, etc) | 1.66% | 3 | 4.42% | 8 | 14.36% | 26 | 26.52% | 48 | 53.04% | 96 | 181 |
| Online and/or in-person course on how to successfully navigate the REB submission process | 17.22% | 31 | 23.89% | 43 | 28.89% | 52 | 16.11% | 29 | 13.89% | 25 | 180 |
| Speaking to REB about your application – before review (e.g. 30-min video call, phone call) | 7.22% | 13 | 22.78% | 41 | 27.78% | 50 | 22.22% | 40 | 20.00% | 36 | 180 |
| Speaking to REB about your application – during review (e.g. 30-min video call, phone call) | 8.33% | 15 | 21.11% | 38 | 25.56% | 46 | 26.67% | 48 | 18.33% | 33 | 180 |
| Instructional videos to guide your writing of the REB application | 29.05% | 52 | 23.46% | 42 | 18.99% | 34 | 16.76% | 30 | 11.73% | 21 | 179 |
| Approved/standard language for consent forms | 4.97% | 9 | 7.18% | 13 | 13.81% | 25 | 23.76% | 43 | 50.28% | 91 | 181 |

| # | Field | Minimum | Maximum | Mean | Std Deviation | Variance | Count |
|---|---|---------|---------|------|------------------|----------|-------|
| 1 | Electronic submission system (in place of Word document/email submission) | 1.00 | 5.00 | 3.79 | 1.31 | 1.71 | 181 |
| 2 | Online repository of previously approved protocols (including SOPs,CORE certificates, etc) | 1.00 | 5.00 | 4.25 | 0.97 | 0.94 | 181 |
| 3 | Online and/or in-person course on how to successfully navigate the REB submission process | 1.00 | 5.00 | 2.86 | 1.27 | 1.62 | 180 |
| 4 | Speaking to REB about your application – before review (e.g. 30-min video call, phone call) | 1.00 | 5.00 | 3.25 | 1.22 | 1.48 | 180 |
| 5 | Speaking to REB about your application – during review (e.g. 30-min video call, phone call) | 1.00 | 5.00 | 3.26 | 1.22 | 1.48 | 180 |
| 6 | Instructional videos to guide your writing of the REB application | 1.00 | 5.00 | 2.59 | 1.36 | 1.86 | 179 |
| 7 | Approved/standard language for consent forms | 1.00 | 5.00 | 4.07 | 1.17 | 1.37 | 181 |

Q37 - Is there anything else that you think would help to improve the REB process at the University of Guelph?

Examples of open-ended textual responses are included throughout the report as direct quotations.