

Guidance on When Translators / Interpreters Are Research Team Members Long Island University Institutional Review Board (IRB)

Long Island University researchers may conduct research requiring expedited or full board IRB review in communities other than their own. Sometimes the research involves collecting data from people whose languages the researchers do not speak or do not speak fluently. In these cases, translators / interpreters are a critical part of the research process. But their activities may raise questions for researchers and reviewers of IRB protocols. Examples are:

- Is a translator / interpreter a member of the research team?
- Do researchers have to specify in the IRB application who is working for them as a translator / interpreter?
- Does a translator / interpreter need to take IRB-required CITI training?

The Office for Human Research Protections (OHRP) is the federal oversight agency for the LIU IRB. OHRP defines the activities that make someone a member of the research team. Among these are:

- intervening or interacting for research purposes with any human subject of research, and
- obtaining the informed consent of human subjects for the research.

If a translator is only providing translations of documents before there is any interaction with human subjects of research, that person is clearly not performing either of these activities.

However, if an interpreter is translating a researcher's spoken or written words so a research subject can understand those words and / or translating the subject's response for the researcher, the situation is not as clear. It can certainly be argued that the interpreter is interacting with the research subject for research purposes, and, sometimes, that the interpreter is obtaining the informed consent of the subjects for the research.

OHRP has provided guidance that clarifies how to determine when an interpreter who is interacting with human subjects is a member of the research team. This guidance says that interpreters are **not** members of the research team in cases where:

1. they perform commercial or other services for researchers provided that **all** of the following conditions also are met:
 - a. the services performed do not merit professional recognition or publication privileges;
 - b. the services performed are typically performed by the interpreters for non-research purposes; and
 - c. the interpreters do not administer any study intervention being tested or evaluated under the protocol.

In answer to the questions posed above, if an interpreter who will be interacting with human subjects for research purposes, does **not** meet any **one** of these three conditions, and the research requires expedited or full board IRB review, that person:

- is a member of the research team;
- does have to be specified in the IRB application; and
- does need to take IRB-required CITI training.

The information in this article is derived from OHRP's Guidance on Engagement of Institutions in Human Subjects Research, October 16, 2008, available at <http://www.hhs.gov/ohrp/policy/engage08.html>.