CLEMSON
RESEARCH COMPLIANCE

# Guidance on When Translators/Interpreters are Research Team Members

Clemson University researchers often 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) defines the activities that make someone a member of the research team as someone who is:

- intervening or interacting for research purposes with participants, and
- obtaining the informed consent of participants for the research.

If a translator is only providing translations of documents before there is any interaction with the participants, that person is clearly not performing either of the activities listed above.

However, if an interpreter is translating a researcher's spoken or written words and/or translating the participant's response for the researcher, the situation is not as clear. The interpreter is interacting with the participants for research purposes and sometimes the interpreter is obtaining the informed consent of the participants.

OHRP has provided guidance, https://www.hhs.gov/ohrp/regulations-and-policy/guidance/guidance-on-engagement-of-institutions/index.html, that clarifies how to determine when an interpreter who is interacting with participants is a member of the research team. According to the guidance, interpreters are not members of the research team if:

> They perform commercial or other services for researchers provided that all of the following conditions also are met:
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> 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.

If an interpreter who will be interacting with participants for research purposes, does not meet any one of the three conditions listed above, and the research requires Expedited or Full Board review, that person:

- is a member of the research team;
- must be identified and their role described in the IRB application; and
- have to complete an IRB approved human subjects training.

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