

## MEMORANDUM

**To:** Rutgers Institutional Review Board  
**From:** Paul D. Gottlieb  
**Date:** March 31, 2017

**Subject:** Attachment 1 to “Request for Exemption from Full IRB Review” for the federally-funded project entitled *Recycling irrigation water at New Jersey nurseries: Creation of a comprehensive decision-making system*

### RESEARCH PROTOCOL

1. Human subjects overview: This project may be viewed as an extension project with a strong one-on-one consulting component. Extension activities are generally not subject to IRB approval because they are not considered to be research. In addition, the federal RFP for this project specifies that research is not permitted (an exception is made for certain kinds of field trials). Still, out of an abundance of caution, we hereby apply to the IRB for exempt status for this project.

We have two reasons for doing this. First, as is often the case with extension faculty, we may publish scholarly articles describing methods and findings arising from this project. Second, we plan to assist a small set of agricultural operators in New Jersey by collecting financial and technical data on their existing operations, and then making confidential recommendations to them for improvement. We will use what we learn from the operators to help us develop a more generalized *financial decision-making tool*—one that could be employed by nurseries and greenhouses throughout the U.S. A considerable amount of additional information (e.g., from the existing extension literature and from financial reference books) will be used to develop this computer decision-making tool.

The only human subjects risk posed by this project is the possibility that sensitive information on an operation’s finances (sales, profits), its business plans, or the quality of its irrigation water discharge would be released in such a way that the operation can be identified. These risks are minimal to start with, but we believe that a proper, IRB-reviewed research protocol can drive them to nearly zero.

This memorandum describes the procedures we plan to implement to ensure the strict confidentiality of any data we collect as a result of this project. A sample consent form and advertising broadsheet are attached to this memorandum. A copy of our project proposal, which has been funded by the New Jersey office of the USDA Natural Resources Conservation Service, completes this **attachment 1** of this IRB application.

The start date for this grant is February 27, 2017. The end date is September 30, 2019. We expect that from one to three South Jersey nurseries will be recruited as sites for this project.

2. Computer files and coding: As soon as a nursery agrees to participate in this project and signs the consent form, it will be given a code name or code letter. From that moment forward, no paper or computer work files for the project will include any direct identifiers of study sites such as name, address, or latitude-longitude. Because there will be relatively few study sites, the principal investigators will be able to connect the operators' true identities to the ID codes and data recorded in Rutgers project files. These connections, however, can take place only in the "investigators' heads," and never in any documentation housed at Rutgers. The investigators have IRB training and understand the importance of keeping these confidences.

This protocol raises the issue of email communications, where the identity of a correspondent cannot be so easily concealed. For this reason, the consent form below gives participants the option to communicate with investigators by telephone or face to face only.

Work files will be secured on Rutgers equipment, and will not be downloaded to personal machines or to personally-owned backup drives. Any work files used by the Certified Public Accountant who is listed as a contractor on this project will be subject to the confidentiality standards of that profession. Where financial and tax information are concerned, these standards are actually stricter than IRB confidentiality standards

3. Scholarly publication: No information will be published that would allow a study site to be identified, or which would allow a reader to connect a particular piece of data to a particular project participant. Individual operators will have the right to waive this protection in writing if they are willing to be profiled publicly. (Our previous project on this subject, featuring large agricultural operations, functioned precisely this way. See <http://farmmgmt.rutgers.edu/recycling-water/index.html>.)

4. Compensation and coercion: This project offers a mutually-advantageous exchange between Rutgers extension personnel and agricultural operators. In exchange for some insights on those aspects of a typical nursery operation that are related to water recycling, we will make site-specific recommendations on technical and financial operations. This approach to recruitment is not coercive and it does not violate the funders' rules against paying for participation. Perhaps more important, it is standard practice within Rutgers cooperative extension. In the course of helping individual farmers, extension agents use what they learn, generalize it, and leverage this knowledge to help others. This is not research as that word is traditionally defined, nor is it payment for research participation.

## FORM ON CONSENT AND CONFIDENTIALITY

Rutgers NJAES project on “Recycling irrigation water at New Jersey nurseries: Creation of a comprehensive decision-making system”

### Project purpose

If you agree to participate in this project, we will use your operation as a test site for the planning of a potential water recycling system (three sites in total are planned). The experience we gain from working with you will be used to develop a computer-based decision tool to help growers nationwide. You have no obligation to install a water recycling system—only to help us think about the regulatory, technological, and financial aspects of this kind of investment in a real-world setting. Your participation in this project will not affect in any way your eligibility to receive grants from our own project funder (Natural Resources Conservation Service of the USDA) to install such a system in the future.

### Benefits and risks to you

- As a *benefit* of this project, we will (with your permission) analyze your entire operation’s finances and make recommendations on operations and financial control procedures.
- The usual *risk* in a project like this involves maintaining the confidentiality of the business information collected by Rutgers personnel.

We will take all steps within our power to ensure that no financial, technological, or operational information will ever be publicly released in such a way that it could be connected to your identity. We have developed a strict research protocol for this purpose, and it has been approved by the Rutgers Institutional Review Board. This research protocol covers our own work files that contain interview results, financial or other forms of data on individual operations.

Email communications represent a distinct confidentiality challenge because the identity of an email correspondent is difficult to conceal. Rutgers keeps the emails of all of its extension faculty on file for a specified period of time. In the consent section below, you may approve or disapprove communication with the Rutgers study team by email.

You also have the right to waive confidentiality at a future date: for example, if you would be willing to have your participation highlighted in trade press stories or extension publications. We will need to get such a waiver from you in writing.

Time commitment, right of withdrawal

This project should take no more than 20 hours of your time over two years, but it could easily take less. Our expectation is that you will regard this as time well spent because of the consulting support we will provide to your existing operation.

You have the right to withdraw from participation in this project at any time, for any reason. The investigative team enjoys a similar right of withdrawal.

If, at any time, you have questions about your rights regarding Rutgers research on human subjects, you may contact the:

Office of Research Regulatory Affairs, Rutgers University  
335 George Street  
Liberty Plaza / 3rd Floor / Suite 3200  
New Brunswick, NJ 08901  
Department Telephone: 732-235-2866  
irb-admin@ored.rutgers.edu

By signing below, you agree that you have read and understand this document and that you agree to participate in this project under the conditions stated.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Print name \_\_\_\_\_

By signing below, you agree to communicate with us by email. In the absence of this signature, we will communicate with you only by telephone or face to face.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Print name \_\_\_\_\_

Preferred email address \_\_\_\_\_

On behalf of Rutgers University:

Signature \_\_\_\_\_ Date \_\_\_\_\_

Print name  Raul I. Cabrera, Ph.D. Associate Extension Specialist in Nursery  
Production and Management \_\_\_\_\_