

Appendix: Membership Comments in Detail

In this Appendix we present the detailed comments gathered from the membership of the Experimental Research Section. The original document is presented in black font while the members' comments are in red. We do not report the identities of the authors of the comments.

Principles of Ethics for Human Subjects Research and Guidance

General Principles:

- 1. Political scientists have an obligation to respect autonomy, to consider the wellbeing of participants and other people affected by their research, and be open about the ethical issues they face and the decisions they make when conducting their research.**
- 2. Political scientists bear sole responsibility for the ethics of their research and its impact on participants, other parties, communities, and the discipline. Researchers should understand that their ethical obligations may go beyond what regulatory bodies require.**
- 3. Political scientists have a general obligation to follow these principles. In exceptional cases there may be good reasons to deviate from these principles, or these principles may even conflict with each other. In such cases, researchers should acknowledge and justify deviations in scholarly publications and presentations of their work.**

Legality

- 4. Political scientists have a general obligation to comply with relevant laws and regulations when they are conducting research in domestic and foreign settings. (see guidance)**

Political scientists should generally comply with relevant laws and regulations as they apply to both the research process and any activities associated with the research. This includes laws and regulations regarding prospective review and permitting as well as laws and regulations related to the activities of the research project.

Political scientists who are conducting research in a foreign country should generally comply with local review, permitting requirements, and other laws and regulations. When researchers think that local review requirements are inappropriate, they should be prepared to justify why they did not comply with local approval processes. For example, when local review may be inconsistent with protection of research participants; when there is reason to believe that review

bodies do not fairly represent the interests of the people under study; when political elites try to use those approval processes to prevent research on topics that might jeopardize their power; or when researchers make a good faith effort and discover that the review or permitting system is non-functioning. In these cases, researchers should seek input from area specialists (regardless of whether such review is required by an IRB or other regulatory body).

Consent and Deception:

- 5. Political scientists have a general obligation to seek informed consent from participants and other parties directly affected by the research process. They should:**
 - a. ensure that consent is fully voluntary and not unduly induce or coerce participation with the promise of benefits;**
 - b. seek continuing consent in research settings where expected risks and realized harms change during a study; and**
 - c. be open about the parties from whom they sought consent, why consent from these parties was meaningful and sufficient, and whether and how consent was documented. (see guidance)**

When seeking consent, researchers should clearly communicate:

- researcher name and affiliation (and contact information when appropriate),
- the general purpose of the research,
- an explanation of what participation entails,
- potential risks to participant,
- potential benefit (or clarification that none are expected),
- whether and how identities and data will be protected, and
- sources of financial support for the research (this is essential for participants to assess risk in some settings, including conflict or polarized zones);
- any other information relevant to the study, setting, or context.

Researchers who do not communicate this information to participants during the consent process should identify and justify their deviation from this practice in scholarly publications and presentations of their work.

Comments:

1. The phrase "other parties directly affected by the research process" is vague. Some experimental research designs involve interventions that aim to decrease socially undesirable actions (e.g., corruption, misuse of public office, criminal behavior) where the full informed consent of "other parties" that take these actions is not viable, especially when these parties are public officials. Of course, local ethical review is essential in these cases and decisions should be justified.

2. The phrase is also ambiguous in field experiments that study activities that would otherwise occur but be unstudied (e.g. interventions by NGOs, government agencies, and so on).

3. Field researchers are also at a unique position of being unable to anticipate what would be considered objectionable by other types of political science researchers. Moreover, "no such ethical review exists for all other forms of research, including ethnographic work or work that endangers subjects through research gathering. Rather, we use the IRB process to decide on what is appropriate and scholars can know that ahead of time".

4. One way to overcome this is to insert language that might indicate possible exceptions, for example "exceptions might include when the other party is causing harm to others...".

5. Another way might be to phrase it as follows: "Political Scientists have a general obligation to seek informed consent when their research activities directly affect participants or other parties' experience of the real world. The latter is intended to make it clear that researchers have an obligation to obtain informed consent when they are directly intervening. Researchers also have an obligation to inform research partners of the risks as well as benefits of RCTs (an oft overlooked ethical dimension).

- 6. Political scientists should generally avoid deception and misrepresentation. Researchers who engage in deception should identify their use of deception, explain why deception was necessary to address the research question, and justify their decisions in scholarly publications and presentations of their work. If a study involves more than minimal harm, use of deception requires exceptional justification. (see guidance)**

Deception can take at least four forms.

- a. Identity deception: Deception about who you are (a researcher in political science) or who you are working with.
- b. Activity deception: Deception about what you are doing (e.g. research for social science) or the situation confronting research participants.

- c. Motivation deception: Deception about the reasons for the research or the use to which the research or data will be put.
- d. Misinformation. Providing false information about the state of the world---e.g. by providing unreliable or inaccurate information about political candidates.

Deception can be an act of commission or an act of omission. That is, researchers can deceive research participants by providing false information or by providing incomplete information that misleads participants. Not telling participants that they are in a research study is a form of deception, commonly termed covert research.

Concerns with deception extend beyond participants to deception of others involved in research including research staff and research partners. In the case of research partnerships, researchers should ensure that partners are not deceived regarding the purposes of research and the questions that can be addressed with the research.

When researchers engage in deception, they compromise the autonomy of research participants. In addition to violating a core value, this lack of autonomy can render research related harms unjustifiable.

In some research designs, blinding of participants or research staff is required for research integrity.

In studies where deception is used, researchers should consider:

- seeking alternative forms of consent, assent, or review (for example asking a small sample of representative participants to assess the study, or asking for consent retroactively);
- whether debriefing participants at the conclusion of the study is possible, appropriate, or even necessary;
- whether it would be appropriate to compensate participants post study.

When justifying their use of deception, researchers should discuss the basis on which they anticipated no more than minimal harm, and how they addressed these and other relevant concerns. If a study involves more than minimal harm, use of deception requires exceptional justification.

Researchers should not use deception when they have good reason to believe that participants would have not consented to participate if asked. Exceptions might include when the subject of study is causing harm to others (see Principle 7) or when the subject of study is a public official or powerful actor (see Principle 10b). Finally, when researchers are conducting studies with expected costs and harms to participants, they should use the minimum study size necessary. These considerations are of special import when studying low-power participants.

Research projects in which deviations from this principle might be justified might include, for instance, studies of abusive behavior, discrimination, or collaborations with governments seeking to measure or counter corruption. In such cases, researchers should acknowledge and justify deviations in scholarly publications and presentations of their work.

The covert observation of anonymized public behavior does not require consent.

Comments:

1. There is an objection to the section on "motivation deception" and a need to emphasize that some forms of deception are much more concerning than others. What is called "motivation deception" here, and "having a cover story" in Psychology, often poses no risk to the participants or anyone else, and is essential to avoiding demand effects and getting useful results. There is a divide among psychologists (who generally believe cover stories are necessary) and economists (who generally avoid cover stories in experiments). Stating this as a type of deception that experiments should avoid seems to suggest that APSA favors economic-style experiments (where the goals and objectives are clear at the outset) and disfavors psychology-style experiments (where we want to see what behavior participants will exhibit without realizing it). Cover stories are often necessary and usually without risk.

2. Furthermore, what it terms as "misinformation" is generally manipulating information about the state of the world (for example, the economy is declining or improving), which is followed by a debriefing afterwards.

3. With regard to "motivation deception" and "omission", one can reasonably envision a situation in which, for example, a survey is fielded in order to examine racist attitudes, but would need to omit that from the recruitment materials and description of the purpose of the study in order to minimize socially desirable responding or selecting out of the survey altogether. Where does this type of practice fall within acceptable guidelines? As currently written, this does not seem like it would fall within acceptable guidelines.

4. The guideline referring to studies with expected costs and harms is concerning. If the study causes harm but is too small to yield reasonable precision, then researchers have caused harm and have not obtained strong scientific answers. In particular, people may conduct post-hoc power analyses that use the observed effect size estimate to calculate the sample size needed for 80%, given that the **truth** is equal to the estimate, then disfavor a study for being "too powerful". This procedure is poor in the first place, and too married to null hypothesis testing in the second

place. It may be better to have something like "minimum precision targets" below which it is unethical to do the study because the answers will be too imprecise to be of much scientific use.

5. Furthermore, this phrasing does not consider the balance between costs and benefits. "Expected costs and harms" could be grounds for objecting to any study of action. For example, voting and speaking about a political issue can be considered costly, as can running for office, and so on. Every RCT (and most observational studies) could be said to have "expected costs and harms" and it seems dangerous to allow this unqualified statement be grounds for objecting to research as "too large". Finally, the guideline that "covert observation of anonymized public behavior does not require consent" should also be explicitly stated in the consent section.

Harm and Trauma

7. **Political scientists have a general obligation to consider the harms associated with their research.**
 - a. **Researchers should avoid harm when possible, minimize harm when avoidance is not possible, and not conduct research when harm is excessive.**
 - b. **When assessing possible harms, researchers should not limit their concern to physical or health-related risks to the participant. Researchers should also recognize psychological, social, and economic harms; harms to other parties affected by the research, and harms to research assistants and staff. (see guidance)**

When assessing possible harms, political scientists should not limit their concern to physical or health related risks to the participant. The researcher also should consider:

- psychological, social, and economic harms;
- harms to others as well as to direct participants that are caused by the research process; and harms to others as well as to direct participants that are caused by the dissemination of research findings, e.g., a breach of confidentiality that reveals the identity of a dissident or her associates who were not studied;
- these considerations of harm are irrespective of participants' behavior, i.e. whether it is immoral or criminal.

Importantly, a researcher's obligation to protect participants from harm sometimes extends beyond what might be required by an IRB or other regulatory bodies.

Political scientists recognize that there may be exceptions to this general principle, but exceptions require strong justification. For example, when the subject of study causes severe

harm to other people and when the study promises to stop, reverse, or reduce these harms, the researcher's obligations to the person may be outweighed by competing obligations to prevent harm to others.

Researchers should identify and justify potential and realized harms in scholarly publications and presentations of their work.

8. Political scientists have a general obligation to anticipate and protect participants from trauma stemming from participation in research.

- a. Researchers should avoid traumatization and re-traumatization when possible, minimize traumatization and re-traumatization when avoidance is not possible, and not conduct research when the potential for traumatization or re-traumatization is excessive.**
- b. Researchers should not intentionally induce traumatization and re-traumatization, and not expose participants to traumatization or re-traumatization without participants' informed consent. (see guidance)**

Research may generate painful emotional or psychological responses by participants, as they are exposed to or asked to discuss sensitive topics. In some instances, the research study itself could be a source of trauma. In other cases ("retraumatization"), the research may ask participants to recall past injuries, such as human rights abuses¹. Trauma may be more likely when research involves war or sexual violence, but trauma may emerge in a wide range of research settings. Political scientists should understand that not all research that asks participants to recollect past events – even traumatic ones – necessarily deepens trauma. Consenting participants may judge that their narration of past events is beneficial to themselves or others even though doing so may be painful or traumatic.

When designing a study, the researcher has an obligation to reasonably and realistically anticipate the potential for trauma and retraumatization. In scholarly publications and presentations of their work, researchers should disclose how they assessed and managed the risk of trauma to participants. Specifically, they should report the prospective steps they took to identify and manage the risk of trauma (for example, excluding certain participants, avoiding some themes, and renewing consent); report whether participants actually experience trauma; and report the steps they took to address trauma if and when it occurred.

¹ In the remainder of this item, "trauma" is used to refer to trauma that results directly from the researcher's project, as well as re-traumatization triggered by the researcher's efforts.

Political scientists who reasonably anticipate that participation in research might cause traumatization or re-traumatization have three additional obligations: (1) during the conduct of research, researchers should regularly renew consent by asking participants whether they wish to continue (particularly if signs of distress emerge); (2) researchers should identify local resources to which participants might feasibly turn to help them address resulting trauma and re-traumatization; and (3) researchers should report in scholarly publications and presentations of their work how they minimized the risk of trauma.

When identifying resources to which participants might feasibly turn for help, researchers should be aware that, in some research settings, the *de jure* existence of a resource may not guarantee its *de facto* availability.

Comments:

Something to consider here would be whether it is important to mention that ethical concerns about trauma and legality should extend beyond research subjects to research staff and assistants as well. Particularly, in sensitive subject areas or those of violence and conflict, we should to be explicit that we should take precautions on behalf of the research staff working with us as well.

Confidentiality

- 9. Political scientists have a general obligation to keep the identities of research participants confidential; when circumstances require, researchers should adopt the higher standard of ensuring anonymity.**
 - a. Researchers should clearly communicate assurances of confidentiality or anonymity to the participant during the consent process.**
 - b. When researchers do not promise confidentiality (for example, research on elites or oral histories in which the participants prefer to be identified) they should clearly communicate the lack of confidentiality to the participant during the consent process and acknowledge and justify their decisions in scholarly publications and presentations of their work.**
 - c. Even when researchers have not promised confidentiality or anonymity, they should assess possible risks and harms to participants and bystanders when deciding whether or not to identify participants and their responses in scholarly publications and presentations of their work.**

- d. When confidentiality or anonymity is promised, the researcher must remain attentive to these guarantees. If research materials are shared, researchers should ensure that the material is sufficiently redacted so that even well-informed parties cannot infer the identity of any person to whom specific statements or information can be attributed. In cases where the risks to participants are particularly high, researchers should decline to share any material. The researcher bears sole responsibility for the decision to share materials, and cannot transfer accountability for this decision to editors, reviewers, or any other party.**

- e. Researchers who determine that it would be unethical to share materials derived from human subjects should be prepared to justify their decision to journal editors, to reviewers, and in oral and written reports of their research findings. (see guidance)**

Political scientists must make a good faith effort to anticipate the ways in which research participants could be harmed by breaches of confidentiality, to anticipate the ways in which confidentiality can be breached, and to design their research projects accordingly. For example, some projects may require researchers to adopt the higher standard of ensuring anonymity, which means not collecting identifying information, including audio and video recordings. Other projects may require researchers to destroy certain identifying information after data collection and analysis. Threats to confidentiality can come in many forms, including carelessness, data sharing, cybersecurity failures, freedom of information (FOIA) requests, and subpoenas. Researchers should discuss the steps they took to protect participant confidentiality in scholarly publications and presentations of their work.

Assurances of confidentiality or anonymity are essential to informed consent; they therefore comprise a core ethical commitment. The researcher should clearly explain to research participants the meaning and implications of confidentiality (or anonymity) and how she will ensure the confidentiality (or anonymity) of the participant's identity.

The researcher is obliged to respect assurances given to participants. The researcher should not retroactively change the commitment to confidentiality; doing so would not only break the promise to the participant and the general obligation to confidentiality (or anonymity), but also could hinder the work of future scholars. If identities are revealed despite commitments to confidentiality or anonymity, research participants and their associates may fear exposure to harm or risk, and may be less inclined to participate in future research.

The researcher bears sole responsibility and accountability for the decision to share materials derived from research participants (if permitted in the informed consent process); accountability

for this decision does not reside with editors, reviewers, or any other party. Even if an editor requires data sharing as a condition of publication, this does not release the researcher from the ethical obligation to protect the confidentiality of their participants. In this case, the researcher must continue to decline, and if need be, pursue publication in another venue. When deciding not to share materials derived from research participants, researchers should be prepared to justify their decision to journal editors, reviewers, and in oral and written reports of their research findings.

Political scientists who feel they are being pressured by reviewers, editors, other scholars, or other parties to engage in practices that are disrespectful or potentially harmful to participants should contact the APSA Committee on Professional Ethics, Rights and Freedoms.

Comments:

Researchers who want to archive, and/or disseminate sensitive qualitative data, should consider consulting with staff at the Qualitative Data Repository (<https://qdr.syr.edu/>) prior to starting a study to think about designing consent forms in a way that would allow the sharing of qualitative data, as well as ways of collecting and archiving the data to preserve confidentiality. This may not directly go in the guidelines but is something that people should be aware of as a resource.

Power

10. When designing and conducting research, political scientists should be aware of power differentials between researcher and researched, and the ways in which such power differentials can affect the voluntariness of consent and the evaluation of risk and benefit.

- a. When conducting research with low-power or vulnerable participants and communities, researchers should be especially careful to respect their autonomy, protect them from harm, and treat them fairly.**
- b. When conducting research with powerful parties, including some public officials, other actors, institutions, and corporations, covert or deceptive research with more than minimal harm may sometimes be ethically permissible (see guidance).**

Public officials and powerful actors:

“Public officials” include elected, appointed, and “merit” public servants at the federal, state, and local levels of government. Appointed and merit public officials range from “street-level” bureaucrats who interact directly with the public (e.g., police officers, teachers, etc.) to cabinet-level appointees (bearing greater responsibility for public policy) and all administrative levels in

between. In their capacities as public officials, public servants have specific duties toward the public according to law, tradition, custom, and norms. Assessing their performance and their role in political systems is both a specific responsibility of political science and a public service.

Because public officials and other people who seek, hold, or wield power in the political sphere are accountable to the public in ways that are different from ordinary citizens, harms related to reputation and employability, and other economic harms (including but not limited to the individual and social costs associated with the research), may sometimes be permissible in the pursuit of the public interest. Accordingly, the need to protect unconsenting participants from these harms might not apply to some research on public officials and other powerful actors. The degree to which these harms may be permissible depends on:

- the public obligations and duties of the public officials;
- the person's role in designing, influencing or implementing public policy. (For example, a public school superintendent bears greater policy responsibility to the general public than the front-line teacher; a powerful political donor has a greater role in influencing policy than an ordinary citizen.)

These exceptions do not apply to their private lives or to other types of harm. Researchers conducting research in both domestic and foreign settings should be aware of how reputational harms could lead to other harms.

Researchers should also be aware that if their research is federally funded, or if they work at institutions that require IRB approval for all human subjects research, they will be expected to comply with their institutional IRB. In the past, researchers could request a public officials exemption in their IRB application, but this changed in January 2019. The new regulations will no longer offer an exemption for research on elected and public officials. Accordingly, researchers should understand that:

- APSA opposed deletion of the public officials exemption from the regulations and indicated so during the public comment period;
- whereas harms to reputation and employability were permissible under the public officials exemption, IRBs now have no regulatory basis to allow these harms for research studies;
- certain types of scholarly activities, such as an "oral history, journalism, biography, literary criticism, legal research, and historical scholarship" are not considered to be "research" and therefore not subject to IRB processes and regulations [Federal Register, § ll.102(1)(2), p. 7261].

Comments:

The statement on public officials having the flexibility to harm unconsenting participants in relation to reputation, employability, and other economic aspects, opens the door too wide for field experiments on elected officials.

Institutions and corporations:

Regarding research critical of institutions and corporations, the American Political Science Association endorses the position set forth in the Canadian Institutes of Health Research Tri-Council Policy Statement:

"Research in the form of critical inquiry, that is, the analysis of social structures or activities, public policies, or other social phenomena, requires an adjustment in the assessment of consent. ... Where social sciences or humanities researchers seek knowledge that critiques or challenges the policies and practices of institutions, governments, interest groups or corporations, researchers do not need to seek the organization's permission to proceed with the proposed research. If institutional approval were required, it is unlikely that research could be conducted effectively on such matters as institutional sexual abuse or a government's silencing of dissident scientists" (Canadian Institutes, 2014, pp.33-34).

" ... some research, involving critical assessments of public, political or corporate institutions and associated public figures, for example, may be legitimately critical and/or opposed to the welfare of those individuals in a position of power, and may cause them some harm. There may be a compelling public interest in this research" (Canadian Institutes, 2014, p. 35).

Researchers designing and conducting research critical of institutions and corporations should be aware that they might still need permission from individuals with whom researchers are interacting. For more, see guidelines for deceptive and covert research (Principle 6).

Canadian Institutes of Health Research, Natural Sciences and Engineering Research Council of Canada, and Social Sciences and Humanities Research Council of Canada, Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans, December 2014. http://www.pre.ethics.gc.ca/pdf/eng/tcps2-2014/TCPS_2_FINAL_Web.pdf [Accessed: January 18, 2019].

Impact

11. Political scientists have an obligation to protect the integrity of democratic processes and institutions as well as the integrity of the profession. In general, researchers should not seek to manipulate political processes, especially elections, without the consent of directly affected parties. Any such engagement requires careful consideration of the potential direct, indirect, and diffuse impacts of research processes. (see guidance)

Research that intervenes in political processes requires particular justification. In such instances, the researcher's obligations to respect autonomy and avoid harm often will extend beyond what might be required by regulatory review bodies. The potential harm, though diffuse, may be significant enough that the research cannot be conducted ethically.²

Researchers who seek to carry out research that intervenes in a political process, especially elections, should respect the autonomy of participants and other people directly and indirectly affected by the research process. For instance, if a research study provides a citizen with information on how to complain against an official soliciting bribes, the citizen is directly affected; the official is possibly also affected, but indirectly through actions taken by the citizen. In such cases, researchers should consider whether consent of such indirectly affected parties is also needed, particularly if there are foreseeable adverse impacts for vulnerable populations.

In scholarly publications and presentations of their work, researchers should explain whether and from whom they sought consent and why consent from those parties was both meaningful and sufficient. Researchers who do not seek consent should acknowledge and justify that decision in scholarly publications and presentations of their work.

Researchers should also strive to: (1) make the intervention and implementation non-partisan; (2) ensure that any information provided is truthful; (3) not weaken democratic processes; (4) present no more than a minimal risk of negatively affecting individual experience; (5) present no more than a minimal risk of affecting social and political outcomes; and (6) be open about whether the intervention had an actual effect (positive or negative) on the individual experience or the aggregate social or political outcome. In scholarly publications and presentations of their work, researchers should explain whether they satisfied these and other relevant conditions, and if not, why not.

² Although participant observation is not usually considered to be an "intervention" (because it typically does not seek to measure the effect of an introduced variable but, rather, seeks to understand existing processes, culture, and meanings), when participant observers intervene and manipulate processes in order to study them, then the above conditions would apply.

Researchers may face difficult choices and competing considerations when conducting studies that intervene in political processes. A specific context may place some of these considerations in conflict with each other. For example, a corrupt electoral authority might only allow interventions that weaken democratic processes and support an incumbent power. In such cases, approval from electoral authorities might be neither necessary nor sufficient for ethical research. Researchers should carefully assess competing claims and explain their decisions. Researchers should also understand that manipulation of a political process that compromises autonomy and causes more than minimal harm cannot always be justified on the basis of the knowledge generated (or anticipated) by the research project.

In some partnerships, researchers work with third parties to learn about the effects of interventions implemented by these parties, for instance to understand the effects of election observers or anticorruption campaigns led by civil society organizations. Such partnerships might not constitute manipulations by researchers. However, third-party collaborations do not transfer all ethical responsibility to the third party. Researchers should be careful to not let a partnership compromise their integrity, the integrity of the research, or the dignity and wellbeing of research participants. A partnership should not be a vehicle to avoid the responsibilities attendant to ethical research. Finally, researchers should disclose the nature of collaborative relationships, including their role and contribution at each stage of the project as well as the nature of funding and/or privileged access granted by the third party to the researcher, in scholarly publications and presentations of their research.

Scholars engaged in commissioned research should strive to meet the criteria listed above. Regardless of whether they satisfy the criteria, they should be open about their design, their use of consent or deception; their sample size and power calculations; the individual, social, and political impact; and their efforts to prevent, minimize, or address any harm. Researchers should identify and discuss these issues in scholarly publications and presentations of their work and public discussions of their research.

These considerations and concerns for impact do not apply to the research outcome. For example, there is generally no concern or harm if a book reaches conclusions unfavorable to a policy or political actor, and these conclusions affect opinion and votes. In addition, if voluntary and informed participation in a laboratory experiment changes opinion, and however unlikely, this changes an election outcome, these considerations do not apply.

Comments (some of these comments concern more than one Principle, but overall views of the Principles and Guidance):

1. As Political Scientists and as Experimental Political Scientists, we need to engage with the ethical questions raised by the research that we conduct. In this spirit, these revised ethical

principles and guidelines are appreciated. Some of the 13 points outlined in the ad-hoc committee's report address important ethical questions in the discipline, including legality, harm and trauma, confidentiality, and power relationships between researchers and subjects of research. At the same time, the Impact principle raises a lot of concerns. Various component parts of this principle, and the enclosed guidance on how to interpret the principle, are at odds with our mission to learn about real-world democratic processes, potentially raising unduly high barriers for work, particularly of the most innovative kind, that has the potential to be beneficial in terms of its social and political impact.

2. The statement "researchers who seek to carry out research that intervenes in a political process, especially elections, should respect the autonomy of participants and other people directly and indirectly affected by the research process" seems difficult to operationalize. In fact, the Committee itself notes this vagueness; in the "Issues for Future Consideration" section, the Committee notes that direct, indirect, individual, collective, and aggregate harm are not defined. Without these definitions, I am unsure how to operationalize these Principles.

3. The statement "researchers should not seek to manipulate political processes, especially elections, without the consent of directly affected parties" raises the question of whether researchers are only allowed to study the causal effects of Pareto improvements.

4. More specifically, the guideline on making "intervention and implementation non-partisan" raises the question of whether researchers are precluded from working with interest groups or political parties on designing more effective communication campaigns.

5. It also raises the troubling possibility that experiments with heterogeneous outcomes across partisanship may be condemned post-hoc - and this could encourage hiding these results by intentionally overlooking the possibility in pre-registration and/or omitting partisan implications in reporting outcomes.

6. Furthermore, given the importance of partisan interventions, it is unfair to be handicapped from testing their effects as long as researchers aren't violating any of the other ethical rules described here, such as making sure government processes or aggregate election outcomes aren't changed.

7. Within the same paragraph, the statement "researchers should strive to . . . present no more than a minimal risk of affecting social and political outcomes", seems to imply that "researchers" -- i.e., individuals -- should not try to affect political and social outcomes. APSA possibly does not have the view that it is unethical for individuals to try to affect political or social outcomes because they also are researchers. This, and the entire section, should be made narrower and apply only to university interventions conducted solely for the purpose of research.

8. The statement “be open about whether the intervention had an actual effect (positive or negative) on the individual experience or the aggregate social or political outcome”, poses some concerns. In nonrandomized studies, how might researchers estimate such effects? Even in randomized studies, assessing individual-level causal effects would require overcoming the fundamental problem of causal inference. Because there can be dispute about the causal effects of an intervention on individuals or aggregate outcomes, critics may have license to adopt the most negative belief about true causal effects. Experiments are especially vulnerable to this criticism, not (only) because they are interventions, but because their randomized designs yield credible estimates of causal effects. So, by design experimentalists get to know what their interventions do, whereas in other research settings, they have far less information about causal effects.

9. If interpreted to require informed consent from anyone who could potentially be impacted by a field experiment that took place in a democracy, and if “manipulation” was understood as a term of art, the assignment of subjects or units to experimental conditions, then the impact principle as cited above would be extremely restrictive. Random assignment or “manipulation” is often required in order to identify the causal effects of interventions into democratic processes. At the same time, there are very good reasons for why researchers who conduct randomized field experiments do not, or cannot, obtain informed consent from everyone who could potentially be impacted by an intervention. Besides feasibility constraints, and theoretical questions about who exactly should be asked for consent, the most important reason is that researchers are worried that obtaining informed consent will introduce bias, and that subjects will change their behavior as a function of informing them that they are part of a study. This phenomenon is widely known as the “Hawthorne effect”. If we want our research to generalize to real-world context, then putting subjects in a position where they know that they are being studied, will make many studies, i.e. related to discriminatory behaviors in the political process, entirely unfeasible, and might severely bias the estimates we receive from studies on other topics. The problem is that in the absence of randomly assigning informed consent, we will have no means of knowing the direction or the magnitude of the induced bias.

Hence, to ignore the potential benefits of “manipulation” and of withholding informed consent in the attempt to identify the causal effects of such interventions is to focus solely on the potential costs of the research, important as they might be, while ignoring all potential social and political benefits. I think one of the major issues with the impact principle as stated in the report of the ad-hoc committee is that any principles relating to the conduct of rigorous and accurate research are absent from the document. But the principles of rigorous and accurate research are often in tension with principles 5 and 11, as outlined in the document. Principles of conducting rigorous and accurate research should be key to any conception of any research ethics, including traditional guidelines for conducting human subjects research, which consider the benefits of a

study as a key aspect of the ethical trade-off involved in conducting research that researchers must navigate.

Therefore, the Experimental Research Section should encourage APSA to assemble a team of researchers with different priors on how obtaining informed consent from all relevant parties would impact the findings of field experiments that could potentially impact on political or social outcomes, and to conduct a large series of field experiments to study if and how requiring “consent of directly affected parties” affects the feasibility and costs of such trials, and particularly, the results obtained from randomized field trials conducted on the major topics in which field experiments are used. These areas of research include GOTV studies, persuasion studies, studies on political activism, and audit studies of many kinds. To be clear, I am suggesting that we randomly assign whether subjects are asked for their informed consent, and to trial different means of doing so. These trials should be designed and conducted in collaboration with members of the Experimental Research Section. While we wait for the results of these trials, I would hope that the APSA can put a moratorium on the impact principle, replacing it with an obligation on researchers to state whether and how they expect their intervention to impact on the political process.

The next points pertain to the guidance issued to interpret the impact principle. The authors of the report state that Political Scientists should strive to: “(1) make the intervention and implementation nonpartisan; (2) ensure that any information provided is truthful; (3) not weaken democratic processes; (4) present no more than a minimal risk of negatively affecting individual experience; (5) present no more than a minimal risk of affecting social and political outcomes; and (6) be open about whether the intervention had an actual effect (positive or negative) on the individual experience or the aggregate social or political outcome. In scholarly publications and presentations of their work, researchers should explain whether they satisfied these and other relevant conditions, and if not, why not.”

Points (1), (4), (5), and (6) are particularly worrying. The guidance that researchers should thrive “to make the intervention and implementation non-partisan” ignores that existing democratic processes and democratic actors are imperfect. Researchers would usually want to study democratic innovations that have the potential to improve democratic processes such as interventions to improve the democratic representation of women and ethnic minority citizens or social groups that have faced institutional discrimination. Examples of such “manipulations” include interventions that encourage women to run for office, or interventions that aim to increase voter registration and turnout of ethnic minority citizens. These are not hypothetical interventions, but very real research projects that might be prevented from happening if the APSA decides to implement the impact principle as given. To give a concrete example, one researcher has recently been approached by a private fund that would like researchers to evaluate innovative methods to register marginalised groups in the UK, including ethnic-minority

citizens, young people, and private renters who move housing a lot. There are well known issues in registering these groups to vote. Few Political Scientists would think that researchers intervening in the democratic process via randomized trials to test methods and messages to help these groups register to vote, would be unethical; quite the contrary. But such studies would clearly conflict with the guidance as stated in this document. All of these interventions might have, in effect, partisan consequences since ethnic minority voters, young people, and private renters are more likely to vote for left-of centre parties.

Yet, as Political Scientists, we should know that democratic processes are imperfect, and intervening in the democratic process to test interventions that could potentially improve these processes should not be avoided, no matter whether they also could have partisan consequences, but encouraged. Of course, it is preferable to collaborate with legitimate actors such as political parties, interest groups, and governments to design and implement these interventions. However, often, methodological advances originate outside of practical politics, and democratic actors, especially governments, want to see evidence in order to adapt those innovations, even if they have the potential to improve democratic processes. A good example of this knowledge transfer between academia and political practice would be the GOTV studies of the late 1990s and early 2000s that were originally conducted without the collaboration of political parties or interest groups, but later adapted at a large scale by a multitude of democratic actors. Clearly, politics in the United States and in many other countries around the globe would not be the same had academics acted in accordance with the impact principle as outlined in this report. It is particularly concerning that for the most innovative interventions, our priors of whether and how those interventions will affect social and political outcomes, will be very weak. The very fact that we do not know, beyond a reasonable doubt, whether and how these interventions affect outcomes, requires a randomized trial. Therefore, points (4) and (5) in the guidance render innovative research into democratic processes impossible.

10. Concerns about vagueness apply to many other recommendations in the document. For example, Section 11 on "Impact" states that "(1) make the intervention and implementation non-partisan; (2) ensure that any information provided is truthful; (3) not weaken democratic processes; (4) present no more than a minimal risk of negatively affecting individual experience; (5) present no more than a minimal risk of affecting social and political outcomes; and (6) be open about whether the intervention had an actual effect (positive or negative) on the individual experience or the aggregate social or political outcome." The term "individual experience" is never defined in this document. It is difficult to avoid "negatively affecting individual experience" without understanding the meaning of this phrase. The Committee may hope that this document will spur researchers to wrestle with these issues, but there will be another set of more pernicious consequences when the report offers vague prescriptions such as these. In particular, vague prescriptions that are open to interpretation may have a disproportionate negative impact on junior scholars and under-represented minorities. More senior scholars will

likely have the clout to assert that their interpretations are proper while junior scholars may be hesitant to conduct research that could be open to various ethical interpretations. Vague regulatory language could thus produce a chilling effect that is most pronounced among scholars who are not in positions of power. Until specific and operational definitions can be articulated and then thoroughly discussed by the APSA membership, the Committee is urged to reconsider making vague prescriptions about how researchers should behave -- consistent with what most legal systems recognize, that vague laws are no laws at all. In the words of U.S. Supreme Court Justice George Sutherland in *Connally v. General Construction Co.*, a statute "so vague that men of common intelligence must guess at its meaning and differ as to its application lacks the first essential of due process of law.

11. Further clarifications are suggested for this principle, as follows:

1. Changing "Researchers should also strive to:" to "When intervening in democratic processes solely for research purposes, researchers should also strive to:"
2. Specifying that the definition of "research" the report employs mirrors the definition of "research" used in the general human subjects guidelines. In particular, I would encourage the report to define explicitly research as "systematic investigation designed to develop or contribute to generalizable scientific knowledge". (Here, per some correspondence with Macartan Humphreys, I have added the word "scientific", since I do not think our guidelines are meant to apply to political actors' attempts at non-scientific (i.e., marketing) research even if it is meant to be generalizable in some senses of the term. E.g., a politician releasing a "trial balloon" to gauge public reaction to an idea is an effort to create general knowledge in a certain sense of general, but not scientific knowledge).

There are good reasons supporting the guidelines on making interventions and implementation non-partisan, and presenting no more than a minimal risk of affecting social and political outcomes. in the context of interventions in political processes conducted solely for the purpose of contributing to scientific knowledge. However, there is a danger that the report's guidelines about striving to make interventions non-partisan or have minimal risk of affecting outcomes could be misinterpreted so as to label as unethical all democratic participation by researchers (or all researchers' attempts to study democratic participation by others) unless this participation is nonpartisan and minimal scale. In particular, the report might be misinterpreted so as to endorse the view that there is something inherently unethical about attempting to affect political outcomes through vigorous participation in democracy. The report does not intend to endorse the view that it is unethical for individuals to participate in democracy, including in a partisan manner or in a way that seeks to change outcomes, such as participation by researchers or participation by organizations that researchers study. Is there something inherently unethical about running for office as a political party's candidate, for example? Or about APSA members

doing so? It doesn't seem like anyone thinks so or that this is what the Committee is trying to say. More generally, APSA may not want to endorse the view that it is inherently unethical to participate in democratic processes, such as by volunteering for campaigns or advocating for preferred candidates, including by researchers when not acting in their university capacities or for APSA members that work as researchers for non-university institutions (e.g., as staff for political parties). To the contrary, through many of its activities, APSA seems to rightly embrace the view that vigorous contestation of democratic outcomes is a positive ethical good that researchers should encourage their students and other members of their societies to participate in.

There should not be an "objection to working with campaigns or third parties that are conducting partisan work. Particularly when that intervention will take place anyway, learning from it is purely pareto improving".

12. To ensure the report is not misinterpreted so as to imply negative ethical judgments about many legitimate forms of democratic participation, these suggestions would make clearer that the ethical guidelines in the "Research that intervenes in political processes requires particular justification. In such instances, the researcher's obligations to respect autonomy and avoid harm often will extend beyond what might be required by regulatory review bodies. The potential harm, though diffuse, may be significant enough that the research cannot be conducted ethically" section, and the "Researchers should strive to: (1) make the intervention and implementation non-partisan; (2) ensure that any information provided is truthful; (3) not weaken democratic processes; (4) present no more than a minimal risk of negatively affecting individual experience; (5) present no more than a minimal risk of affecting social and political outcomes; and (6) be open about whether the intervention had an actual effect (positive or negative) on the individual experience or the aggregate social or political outcome." paragraph, are specific to interventions conducted solely in order to contribute to generalizable scientific knowledge and not to all interventions researchers might conduct or participate in (e.g., running a voter registration drive on a college campus that succeeds in getting students elected to a city council).

An alternative way to make this distinction would be to make the guidelines specific to university research interventions. The involvement of the university captured much of what was found ethically objectionable about the Montana intervention. In particular, universities enjoy a special status in society legally and socially; and these legal and social purposes are broadly inconsistent with conducting partisan campaigns. First, legally speaking, universities in the United States and many other countries are nonpartisan institutions (e.g., in the US, they are 501(c)(3) organizations). Partisan electioneering would therefore violate the law. Second, in most parts of the world, universities enjoy a special public status and credibility. As a result, partisan campaigning by universities would be unfair to the candidates and organizations contesting elections, who do not enjoy universities' special credibility and so who may be unable to respond to our interventions as they would interventions from others (e.g., opposing

candidates). It is not the place of universities in society to be conducting partisan campaigns, as US law recognizes. Due to these considerations, university interventions should not be partisan in nature or seek to manipulate political outcomes. These considerations are what made the 2014 intervention in Montana judicial elections particularly objectionable, in addition to potential violations of other laws. For example, note how we would react by contrast if a political actor such as the ACLU that sought to change outcomes in judicial elections engaged in this intervention for its own research purposes in order to learn how to win judicial elections. This may not be considered unethical behavior by the ACLU, as it is generally considered acceptable for actors like the ACLU to intervene in elections -- even if its purpose when doing so in some instances is to build their own knowledge about marketing (but not to build scientific knowledge). Nor, by extension, would it be unethical for a researcher to study their campaign and write about it.

The report appropriately makes a distinction between interventions conducted solely in order to contribute to generalizable scientific knowledge and interventions conducted for other purposes, such as those that political actors implement to advance their political and social goals. However, by using the noun “researchers” in some key sentences, the report may be incorrectly read much more broadly, to imply that all APSA members as individuals have ethical responsibilities not to participate in democracy or collaborate with or study those who do. I do not think APSA intends to take the stance that it is unethical for its members to participate in democracy or to study democratic participation, and I believe these clarifications would make that clearer. As is, the report implies that practitioners' partisan interventions in elections at scale are somehow inherently ethically questionable, which should be clarified.

13. The reference to “individual experiences” in the guidance document, particularly about the wording that researchers should be open about “whether the intervention had an actual effect (positive or negative) on the individual experience”. The reference to individual experience in the latter sentence should be removed from the guidance because the individual level treatment effect is impossible to identify. The fact that we cannot observe a subject's treated and untreated potential outcomes at the same time, constitutes the fundamental problem of causal inference (Holland 1986). It is therefore impossible for researchers to say whether and how the intervention affected the individual experiences of the subjects included in the experiment.

Particularly, but not exclusively, in non-US contexts it will be very difficult, if not impossible, to define what “the aggregate social or political outcome” referred to under point (6) actually consists of. In multi-party systems, and more proportional electoral systems, even small changes in vote shares or turnout can potentially affect who gets elected. Who wins or loses a seat is sometimes extremely difficult to predict before an actual election took place. Hence, this requirement will be especially difficult to address for comparative Political Scientists working in

non-US contexts. I would hope that the committee considers the disproportional burden imposed on Political Scientists studying countries other than the United States.

None of these considerations absolve Political Scientists from carefully considering, and addressing the ethical challenges that their proposed studies entail. But fear that endorsing the impact principle as stated in the report of the ad-hoc committee, which disregards the potential costs of not randomly assigning interventions into political processes, could do more harm than good.

14. In general, Principle 11 on impact ignores the responsible role that research plays in moderating academic influence on political outcomes. Far from raising ethical concerns, the research process, the ethical considerations and constraints that guide it, is an essential aspect of responsible public engagement and influence. To place restrictions on research may not lead to academics impacting public life less, but may lead to less ethical and transparent impacts.

These considerations and concerns for impact do not apply to the research outcome. For example, there is generally no concern or harm if a book reaches conclusions unfavorable to a policy or political actor, and these conclusions affect opinion and votes. In addition, if voluntary and informed participation in a laboratory experiment changes opinion, and however unlikely, this changes an election outcome, these considerations do not apply.

The report “fails to properly recognize that it is not just conducting research, but also reaching conclusions, that has effects on society. While experimentation is not the only way to learn about the world, it provides a particularly useful tool for resolving some heretofore intractable debates. Research that leads to wrong conclusions has consequences for society”.

15. Principle 11 on impact suggests that research should not influence political processes. Yet, this paragraph allows for research outcomes to influence political processes. Exempting the “impact” of research “outcomes” but not “research” itself, implies that academics can influence policy outcomes, but only if such influence is not studied as part of the research process. Academics should pursue the opposite approach: to subject all possibly influential activities to the transparency, rigor, and peer review associated with research processes.

There is widespread agreement in the discipline that political science should both contribute to knowledge and engage with matters of public importance. Numerous APSA presidents, from Charles Merriam to Robert Putnam to Rogers Smith, have emphasized in their APSA presidential addresses the necessity of academics influencing political outcomes. Therefore, it may be given that academics will be influencing political outcomes and processes.

The proposed guidelines consider whether research should occur with or without an impact on society. Given the academic's role is necessarily to impact society, the proper question is whether impact should occur with or without an associated research program. If we believe political scientists can or should influence matters of public importance, the latter approach is more ethical, responsible, and conservative. Otherwise, academics are free to influence political processes - with the reputational and partisan concerns that may be associated with such activities - free from IRB oversight, peer review, or the constraints of the proposed ethical guidelines.

The agenda is not to bring scrutiny to political scientists' public engagement and impact, whether through expert testimony in courts or in legislatures, through op-eds, or through direct public service. Nor is it to claim that since public engagement is excluded from this document, that it is wrong to place ethical guidelines on research. The committee is right to suggest researchers think through the proposed principles and decide whether research is ethical and advisable. Research tends to face unique, and often more serious, ethical questions than public engagement (informed consent, for example, is almost always satisfied more easily in public engagement than in research).

One view of the research lifecycle, consistent with the quoted paragraph above, is of an academic who conducts a study of the world, without influencing it, and then releases scholarship to the world where it will have an impact. It might be that the academic herself promotes and publicizes the relevance of her work to matters of public importance, or it might be that political activists do that for her. Either way, it is expected that our scholarship speak to, and influence, public matters.

In some ways, that approach fails to incorporate standards of scientific rigor and ethics. Often, academic recommendations for political reform lead to universal and permanent impacts, and any negative side effects are ignored. For example, in my field of legislative studies, in the 1940s APSA convened a Committee on Congress tasked with reforming Congress. The Committee stated that its goal was to "to find ways of reinforcing parliamentary processes and of revising legislative methods so as to expedite the work of Congress and enable it to grapple more effectively with the problems of the positive state" (via Matthews 1981, 96). Their 1945 report made many recommendations, including changing congressional staffing, committees, and registration of lobbyists. All of these reforms were enacted shortly thereafter by the Legislative Reorganization Act of 1946, which should be little surprise since the Chairman of the APSA committee, George Galloway, was also staff director of the Joint Committee on the Organization of Congress that was responsible for the LRA. Under the quoted paragraph, the activities of APSA's committee, and the political scientists on it, would not be constrained by the proposed ethical guidelines, despite the report clearly impacting political processes in ways that might influence the well-being of members of Congress and their constituents.

One problem with the implementation of the LRA of 1946, as well as many legislative reforms, is that it was not accompanied by a research program to evaluate its effects. If reducing the number of committees or increasing staff exacerbated polarization, we would have no way of knowing it. Public engagement by the APSA committee operated separately from, and in fact free of, the type of research that could have determined whether the reforms achieved their intended goals, raised unanticipated side effects, or imposed harm on individuals. Yet the proposed guidelines imply that some attempts to research the effects of the LRA of 1946 would face ethical concerns that advocacy for the LRA did not. This is backwards. And lest one think that this kind of APSA committee is relegated to history, in September 2019 APSA's Committee on Congressional Reform released suggestions to reform the appropriations process. Political scientists can recommend reforms, but, under the proposed ethical guidelines, studying these reforms as part of a research program is considered unethical.

The committee fails to acknowledge that intervention-based research methods, most notably field experiments, support both a rigorous and ethical engagement in public matters. Field experiments are typically limited in scope and temporary in implementation. Rather than recommending that Congress increase funding for staff on an ongoing basis, a researcher might suggest a study to a legislative leader of what happens when staff for a single committee is expanded or better paid. That intervention would likely be limited in scope - the researcher can implement the minimum intervention necessary to detect effects - and time - research projects typically have well-defined timeframes for evaluating the effects of interventions.

The most important contribution of a research program designed around an intervention is that it evaluates the effects of the intervention in a transparent manner. Negative consequences can be identified and publicized. Knowledge will be publicly-available for discussion and criticism. It can be done in a non-partisan, or at least bipartisan, manner. The committee's ethics proposals, to be transparent, nonpartisan, and more, would be facilitated by, rather than conflict with, a research program on legislative reform. Experiments, and intervention-based research, can make public engagement more ethical.

No blanket assertion about experiments or research always playing a responsible role in influencing public matters can be made. Some types of public engagement might be clearly unethical, and research does not make them so. We cannot justify any research intervention just because somewhere a political scientist may be intervening in the same manner as part of her public engagement. To this point, most of the committee's proposed guidelines are a necessary and helpful framework for thinking about ethics. Yet, the hope is that the committee may reconsider or eliminate its suggestion that "researchers should not seek to manipulate political processes" to acknowledge the positive role research can play in facilitating our engagement with matters of public concern.

16. Furthermore, “the notion of third-party consent as a requirement should operate only in conjunction with some notion of harm beyond merely affecting who holds office. If the goal is to prevent experiments that knowingly lead to violence, for example, it is unclear why the IRB process is insufficient to fix this.”

Prospective Review

12. Political scientists have an obligation to be aware of the prospective review and permitting requirements of their funding source, employer, and field site.

- a. Researchers should understand that approval by a review or permitting body is not always sufficient for ethical research, and that the requirements for ethical research may go beyond what IRB's, US regulatory criteria, and other regulatory bodies may require. Researchers should understand that they are responsible for the ethicality of their research. (see guidance)**

Individual researchers and the Association should:

- promote learning *within* campus communities *and across* universities about the actual ethical dilemmas involved in social science research with human research participants; and
- provide guidance to researchers who encounter ethical issues not captured by the IRB charge and regulatory framework.

When researchers think that IRB review requirements are increasing risks to their participants or inappropriately restricting their academic freedom they may appeal to the APSA Committee on Professional Ethics, Rights and Freedoms. For example, when review may be inconsistent with protection of research participants; when there is reason to believe that review bodies do not fairly represent the interests of the people under study; or when political elites try to use those approval processes to prevent research on topics that might jeopardize their power.

Researchers conducting research in both foreign and domestic settings should be sensitive to contextual and cultural differences. Research that seems harmless in one context may be harmful or traumatizing in another. Locally-sensitive prospective review (formal or informal) can help avoid unanticipated harms or problems.

- b. Researchers should be aware that in some cases prospective review or regulatory bodies, journal editors, or other parties might require researchers**

to engage in practices that are disrespectful or potentially harmful to their participants or otherwise unethical. In these cases, researchers should not proceed with the research project or dissemination activity and should contact the APSA Committee on Professional Ethics, Rights and Freedoms. (see guidance)

Individual members and the Association should:

- Help IRBs and other regulatory bodies develop a better understanding of political science research, and the way in which the regulatory criteria and the values of respect for persons, beneficence, and justice should apply to political science research; e.g. the way in which respect for persons should apply to research on corruption, or the way in which beneficence should apply to research on public officials.
 - Assist individual scholars in contesting unfair and unreasonable IRB decisions and other review or permitting bodies, in this way promoting some form of appeals process and, over time, professional learning about research ethics particular to political science.
 - Encourage researchers to share their experiences in working with IRBs and other review and permitting bodies in an effort to improve those processes, promote community capacity building and human participants protections, and help the APSA code evolve. For example, ad hoc and systematic evidence identifying exceptional practices, both desirable and undesirable, would facilitate constructive dialogue on the ethical issues for political science research.
 - Work with US institutions of higher learning, both individually and nationally, to evolve their review systems in ways that promote transparency, evidence-based decision making, and respect for researcher expertise in methodology, methods and, as relevant, knowledge of field site norms and culture.
- c. Researchers should be open about whether they sought and received IRB (or other) approval for their studies and explain their decisions in scholarly publications and presentations of their research. Researchers conducting research in a foreign country should be open about whether their field site had local review or permitting requirements, whether they complied with the process, and explain their decisions in scholarly publications and presentations of their research. (see guidance)**

As stated in guidance for Principle 4 (Legality), researchers who are conducting research in a foreign country should generally comply with local review and permitting requirements. When researchers think that local review requirements are inappropriate, they should be prepared to

justify why they did not comply with local approval processes. For example, when local review may be inconsistent with protection of research participants; when there is reason to believe that review bodies do not fairly represent the interests of the people under study; when political elites try to use those approval processes to prevent research on topics that might jeopardize their power; or when researchers make a good faith effort and discover that the review or permitting system is non-functioning. In these cases, researchers should seek some form of review by area specialists.

Researchers who feel that an IRB or other prospective review or regulatory body is inappropriately restricting their academic freedom should contact the APSA Committee on Professional Ethics, Rights and Freedoms.

Shared Responsibility

13. The responsibility to promote ethical research goes beyond the individual researcher or research team.

- a. Mentors, advisors, dissertation committee members, and instructors should help students and subordinates identify and address ethical issues related to research;**
- b. Graduate programs in political science should include ethics instruction in their formal and informal graduate curricula;**
- c. Editors and reviewers should encourage researchers to be open about the ethical decisions they made in conducting their research; encourage research on research ethics; and provide editorial expressions of concern or solicit independent commentaries when publishing ethically troubling research; and**
- d. Journals, departments, and associations should incorporate ethical commitments into their mission, bylaws, instruction, practices, and procedures.**

Comments:

1. In general, there is a suggestion that this code of ethics should clearly build on and augment the established code of ethics that governs all human subjects research (Belmont Report), respect the diversity of human subjects research done by political scientists, and be actionable. As

currently stated, the ethics guidelines from the Committee do not seem to meet these. In particular,

- 1) It is not clear how these ethical guidelines add to or improve upon the Belmont Report. The Belmont Report goes into deeper detail about how one should consider benefits and risks, for instance. It also does not provide an absolute requirement for informed consent, since this is not always necessary for ethical research (e.g., minimal harm and minimal costs to the participant).
- 2) This document does not respect the diversity of research done by political scientists. Field experimental research, for instance, is often conducted in consultation with groups that have rights to political expression. These rights do not seem to be respected in this document.
- 3) It is not clear how these ethics guidelines are actionable. Is this something that sits on top of IRB approval? How should journals implement these guidelines? These issues are not addressed in the document. As a result, it is not clear how these will be enforced in a uniform way and whether they will be used by gatekeepers to block research on "ethical" grounds. It also potentially opens political scientists up to legal liability that would not be protected by receiving IRB approval, and thus, may not be defended by their universities.