Research with Human Subjects and the IRB

Human Subjects Protection Program
Office of Research Compliance and Biosafety

Presented by:
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HSPP/IRB Manager
Historical Ethical Atrocities

Tuskegee Syphilis Study (1932-1972)
Nuremberg (Nazi War Crimes) Trials (1945-1946)
Wichita Jury Study (1955)
Thalidomide Experience (1962)
World Medical Assn. of Helsinki (1964)
Ethics of Clinical Research NEJM (1966)
San Antonio Contraception Study (1971)
Belmont Report (1978)

1930s
1940s
1950s
1960s
1970s

The Monster Study (1939)
Nuremberg Code (1948)
Willowbrook Hepatitis Studies (1956-1971)
Milgram Studies of Obedience to Authority (Early 1960s)
NIH Ethics Commission (1964)
Jewish Chronic Disease Hospital Studies (1960s)
Congressional Hearing on the Quality of Health Care and Human Experimentation (1973)
Tearoom Trade Study (1970s)

Resulting Key Concepts

Voluntary consent
Freedom from coercion
Comprehension of risks/benefits
Minimization of risk and harm
Qualified investigators
Appropriate research design
Freedom of subjects to withdraw
Favorable risk/benefit ratio
Basic Ethical Principles

• Respect for Persons
  ▪ autonomy of subject

• Beneficence
  ▪ benefits outweigh risks

• Justice
  ▪ selection of subjects is equitable
Where We Are Today

• Federal Regulations
  ▪ “The Common Rule” – June 18, 1991
  ▪ 45 CFR 46 – Basic Department of Health and Human Services Policy for Protections of Human Research Subjects
    • Definitions of Research and of Human Subjects
    • Criteria for review of Human Subjects Research
Is it Research?

• The federal regulations define research as:
  ▪ “a systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge” (45CFR46.102(d)).

• As described in the Belmont Report:
  ▪ “...the term ‘research’ designates an activity designed to test a hypothesis [and] permit conclusions to be drawn... Research is usually described in a formal protocol that sets forth an objective and a set of procedures to reach that objective.”
  ▪ Data must be generated and analysis of the data should occur.
Is It a Human Subject?

- A human subject is defined by Federal Regulations as "a living individual about whom an investigator (whether professional or student) conducting research obtains (1) data through intervention or interaction with the individual, or (2) identifiable private information." (45 CFR 46.102(f)(1),(2))
  - Intervention includes physical/psychological procedures, manipulations of the subject, or manipulations of the subject's environment for research purposes.
Where We Are Today

• System Regulation
  – 15.99.01 Use of Human Subjects in Research
    • Administrative Requirements
    • General Guidelines
Who Are We?

- Human Subjects Protection Program – The people, offices, and programs that work together to conduct the human subjects research.

- Institutional Review Board – The board approves (and disapproves) research involving human participants, while enforcing the laws and regulations that protect the rights and welfare of those who volunteer to participate in research.
15.99.01.M1 Human Subjects in Research
Stipulates Texas A&M University rules that extend beyond the scope of the federal regulations
Most recent update developed by the HSPP Task Force:
  - A student is considered Protocol Director not PI or co-investigator. The student’s mentor is considered the Faculty Sponsor in the PI slot on the application.
  - The IRB application includes separate attestations for PI, Faculty Sponsor, and Protocol Director. The responsibilities in the PI attestation are shared among the Faculty Sponsor and Protocol Director as specified in the University Rule.
  - In iRIS, the Protocol Director must also be listed as the Study Contact to receive notifications about the study.
Where We Are Today

- **Institutional Role**
  - Institutions that “engage” in human subjects research conducted or supported by HHS must sign a written assurance committing them to compliance with HHS regulations.
  - TAMU HSPP involves all human subjects research.
  - We do not defer IRB approval to other institutions but work collaboratively with other IRBs.
Training

- **CITI Training**
  - Must be renewed every three years
  - Web-based ethics course
  - All study personnel must complete CITI training with a minimum score of 90 percent.

- **Alternative Training**
  - Possible for special circumstances
  - Guidance available on the website
Submission Process for Research with Human Subjects

1. Submit Required Documentation
2. Pre-review
3. Review by Committee
4. Communicate Outcome
5. Conduct Research
The Submission Process

• Purpose: To gain approval to conduct research involving human subjects
• Goal: To protect the rights and welfare of research subjects
• Perspective: From the viewpoint of the human subject
How to Submit Your Project

• Online system – iRIS
  http://imedris.tamu.edu

• Training
  – Step-by-step online instructions
  – HELP button
  – FAQs on the website
  – Help line (979.845.4969)
  – iRIS computer help sessions
Application Sections

- Study Personnel
- Conflict of Interest
- Consent and Waivers
- Recruitment materials
- Advertising materials
- Data collection instruments
- Letters of support
- Site authorization
- Other IRB approvals
- Proposal
- Translations
- Letter of cultural evaluation
Submission Process for Research with Human Subjects

Submit Required Documentation → Pre-review → Review by Committee → Communicate Outcome → Conduct Research
Pre-Review

• Completeness
• Consistency
• Accuracy
• Logistics make sense
• Timeline
• Benefit/Risk
• Consent elements
• RCB website resources
• Recruitment contact information
• Waivers
# Liaison Assignments

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<th>Liaison</th>
<th>Email</th>
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<tbody>
<tr>
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<td>College of Architecture</td>
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<td>College of Liberal Arts</td>
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<tr>
<td>Alternate: Mr. Brian Nyquist</td>
<td><a href="mailto:brian.nyquist@tamu.edu">brian.nyquist@tamu.edu</a></td>
<td>979-862-4681</td>
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Submission Process for Research with Human Subjects

1. Submit Required Documentation
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Eight Ethical Assessment Criteria

- Risks are minimized
- Risks are reasonable vs. benefits
- Selection is equitable
- Informed Consent is obtained
- Participation is voluntary
- Data and Safety are protected/monitored
- Privacy and confidentiality are upheld
- Vulnerable population protections are enhanced
Types of Risks

- Harm
- Discomfort
- Inconvenience

- Physical
- Psychological
- Social
- Economic
- Legal
Vulnerable Populations

• Additional safeguards must be implemented for populations in which research may pose additional and/or unknown risks.

• For example
  – Pregnant Women, Human Fetuses, and Neonates
  – Prisoners
  – Children
  – Economically disadvantaged
  – Socially disadvantaged
  – Educationally disadvantaged
  – Cognitively impaired
  – Disabled
## Categories of IRB Review

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<thead>
<tr>
<th>EXEMPT</th>
<th>EXPEDITED</th>
<th>FULL BOARD</th>
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<tr>
<td>• No risk</td>
<td>• Minimal risk</td>
<td>• Greater than minimal risk</td>
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<tr>
<td>• Existing data</td>
<td>• Prospective data</td>
<td>• Annual continuing review</td>
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<td>• 3-year continuing</td>
<td>• Annual continuing review</td>
<td>• Primary/secondary review then IRB meeting</td>
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<td>review</td>
<td>• Single IRB member</td>
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<td>• HSPP manager</td>
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How Is the Category Determined?

- The IRB chair or designated reviewer will make the regulatory determination.
- Your project methodology and administration can play a role in determining the category.
  - Choices can raise/lower risk to subjects
  - But...if your specific choices are important to your project, don’t change your research just to fit what you think the IRB wants to see.
Full Board Operations

• Meetings first Wednesday of the month
• Protocols must be through pre-review a week prior to meeting
• Meetings are closed, but PI or study personnel should be available
  – Phone
  – In-person
• Communicate outcome by Friday after meeting
Submission Process for Research with Human Subjects

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Possible Outcomes

• Can be expected by the end of business the Friday after an IRB meeting

• Additional Revisions
  – Reviewers may request additional revisions.
  – Revisions may breed the need for more revisions or clarification.

• Review Status
  – The review status available in submission tracking in iRIS. Your liaison rarely knows more about the review status than iRIS knows.
  – Reviewers are allowed at least two weeks to review.
  – Deferred, pending, disapproved

• Approval
Submission Process for Research with Human Subjects

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Approval

- How will I know when I can begin?
  - Official approval letter sent through iRIS
  - Use stamped recruitment documents
  - Keep careful track of participation as appropriate for your study
Am I Done?

• Not quite!
  – Keep HSPP informed and study documents current
    • Submit any desired project changes as Amendments
    • Submit any new documents (such as grant approval) or provisions
    • Yearly Continuing Review for Expedited and Full Board projects (exempt – three years)
    • Report any adverse events or deviations
    • Submit a completion report when all study procedures and data analysis are complete
Potential Consequences of Noncompliance

• Suspend and/or terminate study

• Loss of funding

• Letter of apology

• Re-training
Post Approval Monitoring

- Pre-initiation meeting
- Maintain study documents
- Readily available upon request
- Prepare for potential audits by sponsor
- Anticipate each study being monitored every three years
- Maintain compliance
- Educational process
- Assist in responsible conduct of research
Key Tip

- Communicate early in your process with the IRB liaison assigned to your area
  - “Thank you so much for your help and quick response.”
  - “Thank you for trying to get in touch with me.”
  - “I truly believe you are great asset to the IRB team and I look forward to working with you in the future. Thanks again for all your hard work. It was greatly appreciated!”
  - “Thank you again – you have been nothing less than super!”
  - “Fantastic! Thank you for the immediate response. I was expecting this to take a couple weeks because I know IRB is really busy right now. I am impressed you did this in only five minutes. Wow, thank you again and have a nice day!”
  - “Can’t thank you enough for your assistance and quick turnaround! Kudos!”
  - “Thanks so much!! You rock!”
  - “Wow! Thanks for doing that extra work.”
Human Subjects in Research

- Website:
  - http://rcb.tamu.edu/humansubjects

- Email:
  - irb@tamu.edu

- Phone:
  - 979.458.4067