UNIVERSITY of CALIFORNIA • IRVINE

Human Research Protection Program
News Brief

SUMMER 2009

Why Does the IRB Need to Conduct a Continuing Review?

Inside this issue:

Except for human research studies that have been granted Exempt registration, DHHS and FDA regulations require the IRB to continually review ongoing research at intervals appropriate to the potential risk to participants, but at least annually.

While initial IRB review is based on the researcher's best assessment of the anticipated benefits, risk, and procedures, the continuing review process is important because it is based on the conduct of the study. Actual risk can be evaluated and preliminary results can be used to assess the risk/benefit ratio.

Additionally, the risk/benefit ratio may change not only because of unexpected results and effects of the research intervention itself, but because new knowledge resulting from related research may affect the balance.

Taking the time to provide detailed information requested on the form will prevent delays in continuing review and approval of the study. It is important to be responsive to the questions on the continuing review application so that the IRB can conduct a meaningful and thorough review. The IRB recommends that you prepare the submission 90 days in advance for full committee protocols and 45 days in advance for expedited protocols.

Things to Consider:

Keep track of subject enrollment, screen failures, and withdrawals.

Provide specifics about the study's progress and any issues about the informed consent process.

Review any unanticipated problems and adverse events that have been reported to the IRB.

Multi-center studies: Is there any additional information from the Sponsor or Coordinating Center that should be reported ?

Have you provided the data safety monitoring report and/or any interim reports from sponsors and coordinating centers?

Reassess potential conflicts of financial interests. Has any study team member's financial interests in the study changed in the period year?

Review all modifications/amendments to the study over the last year. Determine if additional modifications need to be submitted for IRB review and approval.

Review the risks and benefits of the study. Has there been a change in the risk/benefit profile? Take into account information gathered during the past year such as interim results, reportable events/problems, and/or changes in scientific knowledge.

Submit the continuing application 60-90 days in advance (for full committee protocols); 30-45 days in advance (for expedited protocols).

Reminder: Please do not submit continuing protocol applications any earlier than these suggested timeframes.

Changes to the IRB & Conflict of Interest Process

As of June 1, 2009 there are changes to the Conflict of Interest Oversight Committee (COIOC) and Institutional Review Board (IRB) review process:

1. **Any potential conflicts of interest related to human subjects research must be reviewed by the COIOC prior to IRB review.**

2. **When applicable, the COIOC will develop informed consent language tailored to the specific disclosable financial interest. The generic disclosable financial interest statement currently provided in the consent form templates will no longer be used.**

When reporting a disclosable financial conflict of interest via submission of an IRB Application or a Continuing Protocol Application, the IRB will defer review pending COIOC review. IRB review will also be deferred when a modification request includes a report of disclosable financial interest.

To ensure that IRB submissions are reviewed in a timely manner, it is strongly recommended that Lead Researchers when reporting disclosable financial interests for themselves or other research personnel, submit their IRB documentation including the COI disclosure information to the Office of Research Administration by the COIOC deadline. COIOC and IRB deadlines are posted on the ORA Calendar.

Association for the Accreditation of Human Research Protection Programs, Inc. — Full Accreditation

Meet Dr. Mozaffar– Chair of IRB A!

Tahseen Mozaffar, M.D.

Tahseen Mozaffar, M.D., is director of the UC Irvine-MDA ALS and Neuromuscular Center.

As a nationally recognized expert in his field, Dr. Mozaffar serves as a principal investigator and co-investigator in clinical trials of novel therapeutic drugs for ALS, as well as other neuromuscular conditions. Dr. Mozaffar currently serves as the Chairman for IRB "A".

Why did you want to be an IRB Chair? How were you appointed?

I think it is an extremely important job, to regulate and oversee human research that goes on in the institution. I wanted to be involved with the IRB so that I could learn more about the human research protection issues related to clinical research. I became Chair after serving for about a year and a half as an IRB member. The Dean of the School of Medicine solicited applications for IRB Chair. I thought I would do a good job so I sent in my CV and asked that I be considered.

What is your expertise as it relates to the protection of human research subjects?

As an active clinical researcher, I have had experience with issues relevant to human research protection. As an IRB member I certainly learned more about the regulations and UCI IRB policies and procedures. It is something that you learn on the job as well with the weekly meetings I have with IRB staff.

Do you have any advice for new researchers at UCI?

Become familiar with the applicable regulations. Delays often occur when researchers are not familiar with the critical human research protection issues.

As an IRB Chair, how much time is spent on IRB activities in any given month?

I spend on average 10-12 hours a month.

What is the hardest part of being an IRB Chair?

When actions must be taken against colleagues who may have violated applicable regulations just because they were not familiar with the regulations. It is also difficult at times to see colleagues spending so much time and effort on research activities outside the university. These activities often results in potential conflicts of interest.

Another challenge of the Chair is to provide guidance to the Committee to help them make their regulatory determinations, particularly when there may not initially be a consensus as to the issue being discussed.

What is the most rewarding part of being an IRB Chair?

To know that I am affecting the research at UCI- that I am contributing to this process. It is reassuring to see the dedication of IRB staff and the IRB members who are dedicated to human subjects protections and facilitation of human subjects research.

Is there anything you want the UCI Researchers to know about the IRB?

We are sincerely here to help – to work with the research community to improve and facilitate the research. If there are issues that come up they are requirements that must be addressed.

Is the IRB looking for new members?

Absolutely! We would love to get more faculty who are experienced in clinical research, who are tenured or close to getting tenured. We also want to include those who are not on the tenure track. You can also make a case for involving young research investigator, just starting out- they can learn how to do clinical research with a sound perspective on human research protection matters.

Thanks Dr. Mozaffar!

Who May Serve as a Witness to the Consent Process?

The Protection of Human Subjects in Medical Experimentation Act requires that a witness be included in the informed consent process for medical experimentation studies.

- The witness must sign and date the consent form attesting that the requirements for informed consent have been satisfied; that consent is voluntary and freely given by the subject, guardian, or surrogate, without any element of force, fraud, deceit, duress, coercion, or undue influence.
- **The witness must be impartial; an adult who is not a member of the study team** (i.e., is not listed on the protocol narrative) **and who is not a family member of the subject.**
- A witness signature is also required for consenting subjects who are unable to read and write and for studies where the IRB has approved the use of short form consent.
- For more information about the informed consent process, check out the ORA webpage at: http://www.research.uci.edu/ora/hrpp/informedconsentprocess.htm

Preparing for a Routine Clinical Research Audit:

Essential Documentation

Essential Documents are those that individually and collectively permit evaluation of the conduct of a trial and the quality of the data produced. These documents serve to demonstrate the compliance of the investigator, sponsor, and monitor with the standards of GCP and with all applicable regulatory requirements.

These documents are also the ones that are usually audited by the sponsor's independent audit function and inspected by the regulatory authority(ies) as part of the process to confirm the validity of the trial conduct and the integrity of data collected.

Filing essential documents at the investigator/research and hospital/clinic sites in a timely manner can greatly assist in the successful management of the research by the investigator, sponsor, CRO, or institution.

The list of essential documents is coordinated according to the state of the trial during which they will normally be generated: (1) Before the clinical phase of the trial commences, (2) during the clinical conduct of the trial, and (3) after the completion or termination of the trial.

The records requested, but not limited to, for the audit are (as applicable):

- Master Protocol
- Investigator's Brochure
- IRB-approved Protocol Narrative
- Current IRB approval
- Signed IRB-approved informed consent documents
- Subject enrollment records
- Subject case history
- Subject Medical Records
- Case Report Forms
- Sponsor Correspondence
- IRB Correspondence
- Adverse Events reported to the IRB and sponsor
- Contractual agreement between UCI and study sponsor approved by Sponsored Projects Administration
- Investigational article (drug, device, radio-isotopes, etc.) records
- Investigational drug dispensing records
- Conflict of Interest Disclosure form
- Regulatory reports/recommendations from external agencies
- Department BioSci 199 student files

Thanks especially to Sherry Reece, Regulatory Affairs Specialist & Andrew Walton, Research Compliance Officer in the Office of Research Oversight for contributing this second article.

DATABASES & REGISTRIES

Are you thinking about establishing a data registry for research purposes?

Did you know that IRB review is required prior to establishing a research related database or registry?

Establishing a database for research purposes that may also be used for future researchers and even shared with other researchers (as part of an IRB-approved study) is a HUMAN RESEARCH activity that requires prior IRB review and approval.

If you have a database or other registry that is being used for research purposes (even possible recruitment), or if you are thinking of establishing a research database, feel free to contact the IRB staff regarding the human subject research study requirements.

Announcements

SUMMER OFFICE HOURS

Meet with IRB Staff !!

- Are you transferring your existing research projects to UCI?
- Do you want to learn more about the IRB submission process?
- Do you need some quick tips on how to develop your IRB documents or how to draft your response to the IRB?
- Ask questions, make suggestions!

Schedule time to meet with IRB Staff at the ORA!!

30 minute appointments available — email Beverley at besparza@uci.edu

Please include "IRB Office Hours" in your email subject line.

WHAT IS THE 'EQUIP' PROGRAM?

Human Research Protections (HRP) in the Office of Research Administration is pilot testing the Education and Quality and Improvement Program (EQUIP).

Through EQUIP, HRP staff conduct periodic quality improvement reviews and educational outreach in an effort to ensure that human subject research activities are conducted in accordance with regulations and institutional policies regarding the protection of human subjects. This process is a requirement of our Federalwide Assurance and an expectation of AAHRPP, the accrediting body for human research protection programs.

As the Office of Research Oversight is responsible for the routine review of those studies that fall under the School of Medicine, *EQUIP will primarily focus on social—behavioral research, particularly research that involves greater than minimal risk and/or vulnerable subject populations.*

Institutional Review Board "A"
Biomedical

Matt Kinder
Administrator
949-824-9819
mkinder@uci.edu

Valerie Sanchez
Analyst
949-824-7109
vmiran@uci.edu

Timothy Grigsby
Assistant
949-824-6068
Tim.grigsby@research.uci.edu

Institutional Review Board "B"
Biomedical

Samantha Pash
Administrator
949-824-2576
spash@uci.edu

Cheree DuBose
Analyst
949-824-5622
cheree.dubose@research.uci.edu

Theresa Sanchez
Assistant
949-824-2125
tmsanche@uci.edu

Institutional Review Board "C"
Social - Behavioral

Jessica Sheldon
Administrator
949-824-4779
jessica.sheldon@uci.edu

Alicia Tieman
Analyst
949-824-7114
ateiman@uci.edu

Matthew Alcala
Assistant
949-824-6662
Matthew.alcala@research.uci.edu

IRB Team "D"
Biomedical Expedited
and Exempt Submissions

Laverne Estanol
Administrator
949-824-3831
lestanol@uci.edu

Kristina Grimaldi
Analyst
949-824-6068
Kristina.grimaldi@research.uci.edu

Kin Hang
Assistant
949-824-0665
kkhang@uci.edu

Karen Allen
Director
Human Research Protections
949-824-1558
kallen@uci.edu

Beverley Esparza
Assistant Director
Human Research Protections
949-824-5746
besparza@uci.edu

U.S. Mail:
Human Research Protection Program
Office of Research Administration
University of California, Irvine
300 University Tower
Irvine, CA 92697-7600

The Office is Open:

Monday—Friday
8am—5pm

We're on the Web!

http://www.research.uci.edu/ora/hrpp/index.htm