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Human Research Protection Program Training

Introduction to the Committee on Human Research

Melanie Mace, MA, CIP, CCRP
Education Coordinator, HRPP
Melanie.Mace@ucsf.edu
415-476-9839

UCSF University of California San Francisco

Outline

- **Today we will cover …**
  - What is CHR?
  - Does my projects require CHR review?
  - Levels of review
  - The submission and review process
  - Tips and tricks
  - Getting answers after class

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What Are IRBs and Why Do They Exist?

- **Abuse of research subjects' rights, such as:**
  - Nuremberg Trials in WWII
  - Tuskegee syphilis trial (1932-1972)

- **Institutional Review Boards (IRBs) are charged with protecting the rights and welfare of people involved in research.**
  - Regulations and IRBs formally defined in 1970s

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Committee on Human Research (CHR)

CHR = UCSF's IRB

- **Created in 1966**
- **4 equal panels, each meeting twice a month**
- **IO appoints members**
  - Most members are MDs, PhDs, RNs or PharmDs
  - At least one unaffiliated and at least one non-scientist

Approx. 5,500 Studies at UCSF

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Multiple Regulations and Guidelines

OHRP
OFFICE FOR HUMAN RESEARCH PROTECTIONS

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HIPAA
Health Insurance Portability
and Accountability Act

FDA

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What's at stake if there is no IRB review?

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Mandate of the CHR

Review and make decisions on all research involving human subjects performed by UCSF faculty, staff and students regardless of funding and location.

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Step 1: Are you conducting research?

Research = A systematic investigation that

- Involves development, testing and evaluation
- Designed to develop or contribute to generalizable knowledge

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Quality Improvement = Research?

- **Quality improvement (QI)**
  - Activities designed to evaluate and improve performance in a clinical area or department – not contribute to generalizable knowledge

- **QI projects do not require CHR review, as long as the activities do not**
  - pose significant risk to patients
  - include testing the safety and efficacy of a drug or device in a human subject
  - involve *research* funding

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Step 2: Does your research involve human subjects?

Human Subject = Living individual about whom an investigator conducting research obtains

- Data through intervention or interaction with the individual, or
- Identifiable private information

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Not Human Subjects Research

- **If the PI obtains de-identified or coded data or biological samples under these conditions:**
  1. The research is not regulated by the FDA; and
  2. The researcher never obtains identifiable information.

- **Confirm using the Self-Certification Form**

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Examples of Activities That Do Not Require CHR Approval

- You get de-identified specimens from a tissue bank that has approval to collect and disseminate tissue.

- You analyze coded data from Johns Hopkins. You never sees identifiable information, such as name or date of birth.

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Is CHR Approval Required?

- **You want to analyze tissue that is no longer needed for clinical purposes. Your study coordinator will remove the medical record labels from the specimens before you analyze them.**

- **You want to do secondary analysis on a data collected by your colleague in the School of Nursing. She will give you de-identified data.**

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Step 2: What level of review is needed?

- **Risk to the subject determines the level of review required**

- **"Minimal risk" =** The probability and magnitude of harm or discomfort you think the subject will experience in the research is not greater than the harm or discomfort the subject would normally encounter in
  - daily life or
  - during *routine* physical or psychological examination or tests.

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Exempt Certification

- **Exempt research involves human subjects, but CHR *approval* is not required.**

- **However, CHR must *review* the application and *certify* that the project qualifies for the exemption.**

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Exempt Certification

- **Exempt research must**
  - Be minimal risk and
  - Fit into one of four federal categories
- **1-2 CHR reviewers**

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Exempt Category 1

- **Category 1 – Established or commonly accepted educational settings, involving normal education practices, or the effectiveness of or the comparison of methods**

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Exempt Categories 2 and 3

- **Category 2 – Educational tests, surveys, interviews, or observations of public behavior, *except* if you collect identifiers <u>and</u> info that could place subjects at risk**

DOES NOT APPLY to research with inpatients, children (minors), or prisoners.

Category 3 – Interviews/surveys with elected public officials

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Exempt Categories 3 and 4

- **Category 4 – Research involving the collection or study of existing data, documents, records, or specimens, *if***
  - these sources are publicly available *or*
  - you record the information in a way that subjects cannot be identified, directly or through links.

Important note: Cannot collect any identifiers, including dates.

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Expedited Review

Allowed for studies that are

- no more than minimal risk *and*
- fit into 1+ federal expedited review categories

- **1-3 CHR reviewers typically**

EXPEDITED = minimal risk
≠ fast (sometimes)

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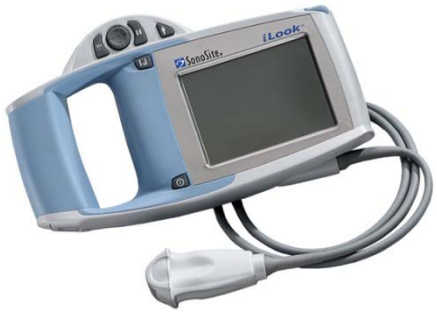
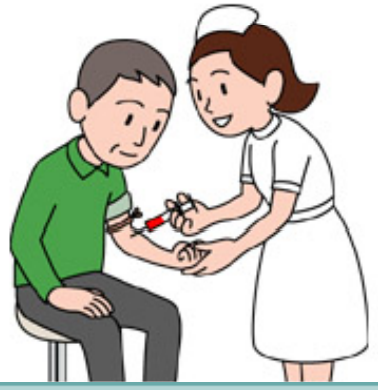
Expedited Review Categories

- **Category 1** - Approved drug or and device for its approved indication



- **Category 2** – Blood sampling
  - amounts cannot exceed 550 ml in an 8-week period
  - collection cannot occur more frequently than 2 x/week for healthy adults



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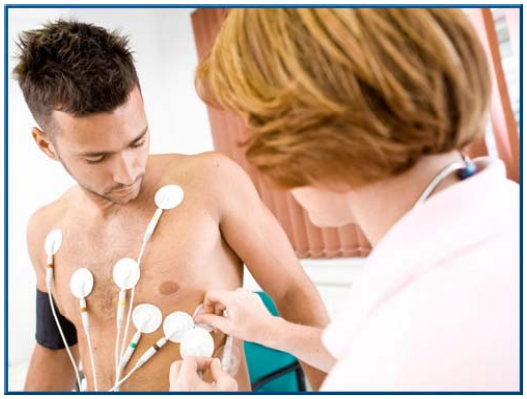
Expedited Review (cont'd)

- **Category 3** – Non-invasive specimen collection, such as cheek swabs, urine or hair samples

Category 4 – Non-invasive clinical procedures, such as MRI, EKG, ultrasound, moderate exercise testing – **NOT X-ray**



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Expedited Review (cont'd)

- **Category 5** – Use of data or specimens collected for non-research or research purposes (includes medical record reviews)

- **Category 6** – Collection of data from voice, video, digital, or image recordings

- **Category 7** – Low-risk behavioral research

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Full Committee Review

- **Required for studies that are**
  - Greater than minimal risk or
  - Are minimal risk, but do not fit in an expedited review category
- **Reviewed at CHR meeting**

Examples:

- Investigational drugs/devices
- X-rays
- Behavioral studies involving risky interventions, observations of illegal behavior, or very sensitive data/questions

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Quiz: What Level of Review is Required?

- You ask subjects with back pain to fill out a questionnaire about their symptoms. They also will have a 10-mL blood draw, and the researchers will review their medical records.

- Subjects with back pain will undergo an MRI and an x-ray to see which imaging technique (if either) is better at identifying the underlying problem.

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Quiz: What Level of Review is Required?

- You are analyzing cerebrospinal fluid specimens that were collected by a colleague at Stanford. The specimens are de-identified.
- You ask providers at holistic health centers to complete an online survey asking about their methods of treating back pain.
- Subjects with back pain will wear a device that periodically sends an electrical pulse through the spine for 7 days.

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What do CHR members consider when reviewing a new study?

- **Risks to subjects are minimized**
  - Procedures consistent with sound research design
  - Do not unnecessarily expose subjects to risk
  - Utilize procedures already done for treatment
- **Risk/benefit ratio**
- **Equitable subject selection and fair recruitment**
- **Consent sought and documented appropriately**
- **Protection of privacy and confidentiality**

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Confidentiality and Privacy

- **Confidentiality = Data**
  - **Physical Security :** Locked cabinets/offices/suites, physically secure computers/servers
  - **Electronic Security:** Follow UCSF minimum electronic security standards:
    - Encrypt portable devices,
    - Do not store identifiers on unencrypted portable devices,
    - Use password-protected files and secure networks

- **Privacy = Individuals**
  - Is there a private area to interview participants?

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Obtaining Informed Consent

- **Subjects must be informed about a study and voluntarily agree to participate**

- **Generally, if you interact with subjects, some sort of consent should be obtained.**

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Signed Consent

- Consent forms, parental consent forms, assent forms
- Required for greater than minimal risk research
- Use UCSF templates

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Waiver of Signed Consent

- **Information sheet and/or verbal script**
  - May be electronic
- **Allowed in circumstances for minimal risk research in which:**
  - confidentiality is main risk or
  - signed consent is not usually required

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Waiving Informed Consent

- **CHR can waive consent if all of these points are true:**
  - The research is minimal risk,
  - The waiver will not adversely affect subjects,
  - It's impracticable to obtain consent, and
  - Subjects will be provided with add'l pertinent information after participation (when applicable).

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HIPAA Requirements

- **HIPAA =** law to protect patients from inappropriate disclosures of their Protected Health Information (PHI) that could harm to their insurability, employability and/or their privacy

- **PHI =** info in the medical record that can be used to identify an individual and that was created, used, or disclosed when providing a health care service
  - Examples: names, dates, medical record #s

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How Does HIPAA Affect Your Research?

- **Must obtain approval to use and disclose PHI from research subjects:**
  - **Subject Authorization** – sign in addition to the consent form
  - **Waiver of Authorization** – for the entire study or just for recruitment purposes

- **Check your initial review and continuing review CHR approval letters**

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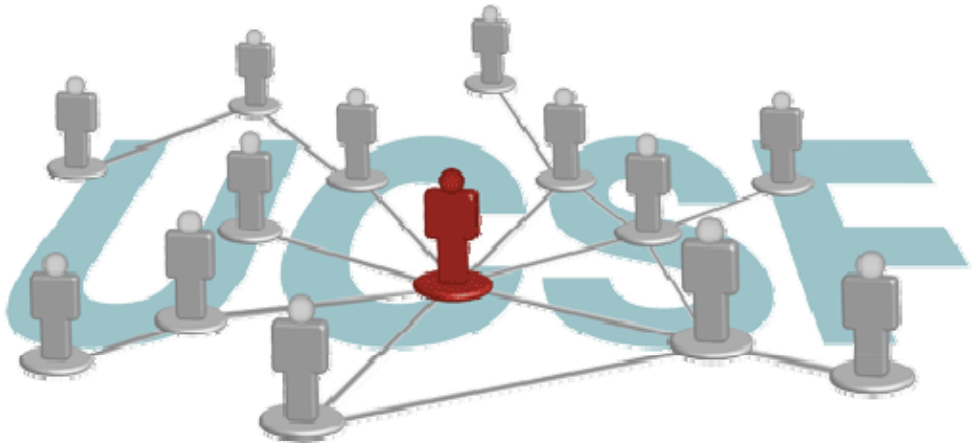
Who Can Serve as Principal Investigator?

- **The PI must be a** UCSF faculty member **who meets the eligibility requirements for PI status on grant applications**

- **UCSF Postdoctoral Fellow** – only with eligible Co-PI



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Who Needs Human Subjects Training?

- **Key Study Personnel – take UCSF's human subjects training through the CITI Program (www.citiprogram.org)**

- **Key Study Personnel** = contribute in a substantive way to the execution and monitoring of the study, which includes obtaining consent

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How to Submit?

iRIS at UCSF

- **All submissions come through iRIS, the CHR's online submission system.**

- **iRIS sits behind MyAccess (https://myaccess.ucsf.edu).**

CHR - iRIS (iMedRIS)	**VPN required when accessed remotely.** Committee on Human Research submission and review

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Review Process

- **PI submits the study**
  - CHR administrative pre-review screening ⇆
  - ↓
  - Review by Committee, CHR member(s) or Chair ⇆
  - ↓
  - Post-review correspondence ⇆
  - ↓

This process takes time, so plan accordingly!

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IMPORTANT:

CHR review is required before initiating, modifying, or extending your research project.

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Other CHR Submissions

- **Modifications**
- **Continuing Reviews**
- **Post-Approval Event Reporting** – Adverse Events, Protocol Violations and Incidents, and Safety Information
- **Study Closeout Reports**

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Modifications to Approved Studies

- **Full Committee and Expedited Studies: All changes to a study, even minor ones, must receive CHR approval before they are implemented.**
  - Exception: Implementing a change to "eliminate apparent immediate hazards to the subject.
  - Notify CHR within 5 days.

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Modifications to Approved Studies

- **Describe requested changes on a Modification Form**
- **Attach documents or forms that are being revised**

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Types of Modifications

- **Administrative: Changes that do not affect participants**
- **Minor: Very minimal or no increased risk to subject**
- **Major: Changes that are more than a minimal increase in risk or require re-evaluation of the risk/benefit ratio**

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Modifications for Exempt Studies

- **OK to make *minor* changes to the study without notifying CHR.**

- **Significant changes must be submitted to the CHR, such as:**
  - Adding a new subject population or new procedures
  - Adding a new funding source
  - Adding sensitive questions to surveys or interviews
  - Other change that makes the study not exempt

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Continuing Review

- **Approval is granted for up to 1 or 3 years**
- **Submit a Continuing Review Form approx. 6 weeks prior to expiration**
- **Work CANNOT continue on an expired study unless it is for subject safety**

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Adverse Event Reports, Protocol Violations or Incidents, and Safety Info

- **CHR must review to determine if**
  - the risk/benefit ratio is still acceptable
  - changes need to be made to the study procedures or design
  - new or enrolled subjects need to be given any new risk information
- **Review reporting guidelines on our website:**

  http://www.research.ucsf.edu/chr/Apply/Post-Approval_Reporting.pdf

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Closeout Report

- **Submit when study is complete**
- **Do not submit if subject follow-up is ongoing or identifiable data or specimens are still being analyzed**

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Tip #1 – Comprehensive CHR Application

- **The Committee members don't know your research project, so …**
  - Formulate careful responses to all questions – don't overlook providing a discussion of risk, privacy and confidentiality, even if just doing interviews
  - Thoroughly discuss the background and goal of study
  - Describe procedures so they can be reproduced
  - Experimental versus standard of care?
  - Submit all attachments (see Initial Submission Checklist)

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Tip #2: CONSISTENCY IS 

- All documents (consent forms, questionnaires, ads) and sections of the application should be internally consistent

- Define groups with clear labels and use consistent terminology throughout

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Tip #3: Explain What Is Different or Sensitive

- Explain special precautions to protect vulnerable populations
- Carefully address and discuss any issues that may raise ethical concerns or may be uncomfortable

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Tip #4: Ask Questions

- **Call or email the CHR and ask for the Analyst of the Day**
- **Main CHR Line:** 415-476-1814
- **Main CHR Email:** chr@ucsf.edu

- **The HUB:** http://hub.ucsf.edu – lots of research resources for investigators and study staff

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Tip #4: Ask Questions (con't)

- **Website:** www.research.ucsf.edu/chr
- **Sections for submission help:**
  - Help and Information for iRIS,
  - Applying and Reporting to the CHR, and
  - UCSF Guidance on Research Topics and Issues

- **Quick guides and additional resources – click the Help button in iRIS.**

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Questions and Thank You!

Thanks for coming! Any more questions?

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