West Virginia University
Office of Human Research Protections

New Initiatives and Continued Growth

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WVU Senior IRB Coordinator
Objectives

1) Demonstrate knowledge of the Human Research Protection Program, WVU IRB, and the WVU Office of Human Research Protection

2) Describe changes in the Office of Human Research Protections

3) Describe ongoing projects and growth

4) Describe upcoming projects and growth trajectory
Overview

➢ History and Terms
➢ Procedures, Processes, and Pitfalls
➢ Growth and New Initiatives
➢ Q & A
What is the purpose of an IRB?

The primary purpose of an IRB is to protect the rights and welfare of humans involved in research.

The IRB is tasked with compliance of the following federal regulations.

- Food and Drug Administration (FDA)—investigational drugs and devices
- Office of Human Research Protection (OHRP)—federally funded research
- Office of Civil Rights (OCR)—research involving PHI (HIPAA)
IRB Responsibility & Authority

Responsibility

Review of any “Human Subjects Research” conducted by or under the auspices of any WVU faculty, student, or staff
- Louis A. Johnson Veterans Affairs Medical Center
- WVU affiliate sites
- West Virginia University Health System (WVU Medicine)

Authority

- Require review and monitoring
  - Submissions can be made in the WVU+kc system
- Approve, disapprove, or require modifications for approval
- Conduct continuing reviews
- Observe/verify changes & methods
- Suspend or terminate approval
Who needs the IRB?

What events led to the creation of IRBs and the regulations as we know today?

➢ Nuremberg Trials and Code (1940s)
➢ Thalidomide (1950s)
➢ Tuskegee Syphilis Study (1932-1972)
➢ Declaration of Helsinki (1964)
➢ National Research Act (1974)
➢ THE BELMONT REPORT (1979)
➢ Common Rule adopted (1991)
Nuremberg Trial that led to the Code

1946
• Trial - December 9, 1946, an American military tribunal opened criminal proceedings against 23 leading German physicians and administrators for their willing participation in war crimes and crimes against humanity.

1948
• Nuremberg Code was established in 1948, stating that "The voluntary consent of the human subject is absolutely essential," making it clear that subjects should give consent and that the benefits of research must outweigh the risks.

Result: First international document which advocated voluntary participation and informed consent.

Resources: http://www.ors.umkc.edu/research-compliance/institutional-review-board-(irb)/history-of-research-ethics
Can you see a trend?

**Thalidomide Study**
- 1950s - Approved in Europe as a sedative but not United States by FDA
- Given to pregnant women – no informed consent
- Estimated that about 12,000 babies were born with severe deformities
- 1962 – “Kefauver Amendments” – drug manufacturers must prove effectiveness before marketing

**Tuskegee Syphilis Study**
- 1932-1972
- 600 low income African American males were monitored for 40 years.
- 400 infected with Syphilis
- Subjects were not told of their disease
- Cure for Syphilis – 1950s
- Subjects were denied treatment

Resources: [http://www.ors.umkc.edu/research-compliance/institutional-review-board-(irb)/history-of-research-ethics](http://www.ors.umkc.edu/research-compliance/institutional-review-board-(irb)/history-of-research-ethics)
Declaration of Helsinki

Overview

• 1964 – World Medical Association
• Guidelines for medical doctors in biomedical research
• Governs international research and provides rules for combined clinical care and research
• Basis for Good Clinical Practices (GCP)

Declaration of Helsinki includes:

• Human Research should be based on the results from laboratory and animal experimentation
• Research protocols should be reviewed by an independent committee prior to initiation (IRB)
• Informed consent from participants is necessary
• Research should be conducted by medically/scientifically qualified individuals
• Risks should not exceed benefits

Resources: http://www.ors.umkc.edu/research-compliance/institutional-review-board-(irb)/history-of-research-ethics
National Research Act (1974)

“The National Research Act created the National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research, which was charged to identify the basic ethical principles that should underlie the conduct of biomedical and behavioral research involving human subjects and to develop guidelines which should be followed to assure that such research is conducted in accordance with those principles.”

“In 1974, the National Institute of Health developed regulations to protect human subjects, promote ethical research and reduce research misconduct. With the passage of the National Research Act established the National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research. The Commission issued recommendations identifying the basic ethical principles that should underlie the conduct of both biomedical and social behavioral research involving human subjects and recommending guidelines to ensure that research is conducted in accordance with those principles. It also established the need for Institutional Review Boards (IRBs). The Commission’s report led to the Belmont Report.”

RESULT: IRBs and BELMONT

Resources:  http://www.ors.umkc.edu/research-compliance/institutional-review-board-(irb)/history-of-research-ethics  
https://www.solutionsirb.com/history-of-irbs/
## Applying Belmont

<table>
<thead>
<tr>
<th>Respect for Persons</th>
<th>Beneficence</th>
<th>Justice</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Subjects given the opportunity to consent – Informed Consent</td>
<td>• Risk/Benefit ratio assessment</td>
<td>• Equitable selection of study subjects</td>
</tr>
<tr>
<td>• Privacy and Confidentiality</td>
<td>• Maximize benefits/minimize harm</td>
<td>• Fair procedures and outcomes</td>
</tr>
<tr>
<td>• Additional protections - Vulnerable Populations</td>
<td>• Data monitoring and safety</td>
<td>• Shared burden</td>
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Resources: [http://www.ors.umkc.edu/research-compliance/institutional-review-board-(irb)/history-of-research-ethics](http://www.ors.umkc.edu/research-compliance/institutional-review-board-(irb)/history-of-research-ethics)
Summary of Historical Events

➢ Nazi atrocities in World War II drew attention to the lack of international standards in research with human subjects and led to the creation of the Nuremberg Code (1948).

➢ The thalidomide study (1950s) led to the adoption of the "Kefauver Amendments" (1962) to the Food, Drug and Cosmetic Act, requiring drug manufacturers to prove to the FDA the effectiveness of their products before marketing them.

➢ The Declaration of Helsinki is the basis for Good Clinical Practices (GCP) used today.

➢ The Tuskegee Syphilis Study is identified as one of the worst cases of unethical human subjects research in the history of the United States.

➢ The National Research Act codified the requirement that human subjects in research must be protected and set the stage for the issuance of the Belmont Report and IRBs.

Resources: http://www.ors.umkc.edu/research-compliance/institutional-review-board-(irb)/history-of-research-ethics
The Common Rule

The regulations found at 45 CFR part 46 are based in large part on the Belmont Report and were written to offer basic protections to human subjects involved in both biomedical and behavioral research conducted or supported by HHS.

In 1991, 14 other Federal departments and agencies joined HHS in adopting a uniform set of rules for the protection of human subjects, identical to subpart A of 45 CFR part 46 of the HHS regulations. This uniform set of regulations is the Federal Policy for the Protection of Human Subjects, informally known as the “Common Rule”.

Three (3) additional subparts

- Subpart B – pregnant women, fetuses, neonates
- Subpart C – prisoners
- Subpart D – children

“Throughout history, individuals and groups were sometimes targeted for unethical research and experimentation. The burden of research was borne by typically vulnerable populations such as children, prisoners, poor, uneducated, elderly, those with mental illness and minority groups.”


Office of Human Research Protections
What is “Human Subjects Research”?

**Definitions**
- Must be Research
  - Systematic investigation designed to contribute to generalizable knowledge
- Must involve living individual(s) about whom an investigator, conducting research:
  - Obtains information or biospecimens through intervention or interaction with the individual and uses, studies, analyzes the information or specimen
  - Obtains, uses, studies, analyzes, or generates identifiable private information or identifiable biospecimens

**Types of IRB Submissions**
- Not Human Subjects Research (NHSR)
- Exempt
- Expedited
- Full Board
- Central IRB (CIRB)
- WVU Flex Model
- IAAs, sIRBs, Reliance Agreements
- Tissue/Data Repositories
- Prep to Research
- Approval in Principle
Overview of Changes

• Office Personnel
• IRB Chairs and Board Members
• Procedural and Form Changes
• Internal Process Changes
• New Review Types
• Regulation Updates
Passing the Torch...

**Turnover**
- Directors (< 5 years)
- Retired Senior IRB Coordinator
  - Almost 30 years at the WVU IRB
- 5 IRB Coordinators
- Blue Board Chair and Vice Chair
- IRB Members

**Additions**
- New Director – WVU OHRP
- New Staff and Positions
  - Senior IRB Coordinator
  - 3 New IRB Coordinators
  - Quality Improvement Manager
- New Blue Chair and Vice Chair
- IRB Members
Changes Along the Way...

**HRPP Procedures**
- Common Rule Update
- Approval In Principle
- Continuing Review Cycles
- ICF Template Changes
- HUD Review
- New SOPs
- Submission Deadlines

**WVU OHRP**
- WVU Flex Model
- IRB Fees
- Forms and Guidance
- Call Management
- Quality Improvement Program
- Data Use Agreements
- CIRB/Collaborative Research
WVU Flex Model

Key Information

// Designed for NON-federally funded

// Minimal risk studies

// Streamlines research submissions

// Reduces burden on Investigators

// Launched October 15, 2018
WVU OHRP

IRB Fees

- Expedited Protocols and Expedited Category 8 reviews – 04/01/2018
- Increased and added fees – 07/01/2019

Training and Education

- Complete restructure of the Quality Improvement Program (QIP)
- QIP - One (1) consultant to five (5)
- QIP - piloted January 2020
- Research Community Forum
Event Reporting

**SOP**
- New SOP developed combining all Research Related Events
- Change in Limited Event Reporting - following IRB of Record
- CIRB Limited Event Reporting clarified in Determination Letter

**Guidance**
- Event Reporting Requirements Chart - New Resource
- CIRB Workflow Chart - New Resource
- AE Reporting Flow Chart - New Resource
- Definitions - New Resource

**Forms**
- Research Related Event Form - New Form (AE/SAE, Deviation, and UPIRTSO)
- Complaint Form - Updated Form
- Deviation Tracking Log Template - New Form/Resource
- AE/SAE Tracking Log Template - New Form/Resource
Submission Information:
When an external IRB is determined to be the IRB of Record, the WVU IRB requires that an Administrative Review of the study, by the WVU IRB, is conducted following study and/or site approval by the IRB of Record. This serves as a registration of the study at WVU and allows for the appropriate signature signoffs as well as ensuring local considerations are accounted for in the Informed Consent and training requirements for study personnel are met.

WVU has standing agreements with NCI CIRB, WIRB-Copernicus, and Advarra. For other CIRBs or Institutions, an IAA will be required.

Private/Industry-sponsored clinical trials that are reviewed through private, for-profit IRBs, must pay an initial administrative fee of $1500 for each protocol to the WVU IRB.

Central IRB use applies only to Phase II through IV studies. Phase I studies must be reviewed by the WVU IRB.

Investigator-initiated and single site studies must be reviewed by the WVU IRB.

Note: At this time, no director sponsor submissions, on behalf of WVU, are permitted.
CIRB Event Reporting

Limited Event Reporting

➢ Unanticipated, serious adverse events and/or side effect(s) encountered at WVU or an affiliate site that are found to be related to the research, must be reported to the WVU IRB within five (5) days, using the Notify IRB action in WVU+kc, following receipt of a determination from the IRB of Record.

➢ Any Unanticipated Problem or UPIRTSO or other research related event resulting in new or increased risk of harm to study subjects reported to the IRB of Record and occurring at WVU or an affiliate site, must be reported to the WVU IRB within five (5) days, using the Notify IRB action in WVU+kc, following receipt of a determination from the IRB of Record.
### Resources and Templates

#### Consent Forms
- New Consent Form templates due to updated Common Rule
- New Consent Template for Combined Parental/Assent
- Updated language for Financial Considerations and HIPAA
- Removal of requirements for Co-Investigators, initial and date, etc.

#### Templates
- Change of PI Letter - New Resource
- Patient Letter - New Resource (pending approval)
- Delegation of Authority Log - New Resource

#### IRB Forms
- HIPAA Waiver Form
- All forms updated with New Letterhead and uniform style
- Tissue/Data Repository Form
- Approval In Principle Application
## Process Changes

### Continuing Reviews
- Elimination of one year wait period following closure to enrollment
- Approval Periods extended based on Updated Common Rule

### Special Topics
- Deception
- Suicide and Suicide Ideation
- Genetic Research
- Vulnerable Populations

### Submission Changes
- HUD Reviews – Expedited following Initial Approval
- Approval in Principle
- Submission Deadline (Approved - 02/19/20) - 10 business days
- Approval In Principle Application
### Continuing Review Cycles

<table>
<thead>
<tr>
<th>Protocol Type</th>
<th>Review Cycle</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full Board</td>
<td>1 year</td>
<td>No change</td>
</tr>
<tr>
<td>Expedited</td>
<td>2 years</td>
<td>Extended from 1 year to 2 years</td>
</tr>
<tr>
<td>Exempt</td>
<td>5 years</td>
<td>Extended from 3 years to 5 years</td>
</tr>
<tr>
<td>Flex</td>
<td>5 years</td>
<td>New category of review</td>
</tr>
<tr>
<td>NHSR</td>
<td>5 years</td>
<td>No change</td>
</tr>
<tr>
<td>CIRB</td>
<td>10 years</td>
<td>No change</td>
</tr>
</tbody>
</table>

*Note: These continuing review cycles only apply to those protocols under the Updated Common Rule.*
and...more changes

| WVU+kc                          | • Clarified questions regarding reconsent in amendments and CRs  
|                                | • HIPAA questions updated  
|                                | • New Letters and notifications in the system  
|                                | • UA node - no longer requires a signature  

| Collaborative Research         | • IAAs – More than Minimal Risk IAAs must be submitted in WVU+kc  
|                                | • SMART IRB  
|                                | • IRB Exchange  
|                                | • CIRB Process Updates  

| Submission Changes             | • HUD Reviews – Expedited following Initial Approval  
|                                | • Approval in Principle – application, letter, and SOP  
|                                | • Submission Deadline (Approved - 02/19/20) - 10 business days  
|                                | • CITI Administrator Agreement and Information Requests  

West Virginia University
Office of Human Research Protections
Growth in Research

![Bar chart showing growth in Active IRB Protocols from December 2019 to February 2020.](chart.png)
Growth in Research

IRB Protocol Reviews

- Initial Approvals
- Continuing Reviews
- Amendments
- Expirations
- Closures

- February 2018
- February 2019
- February 2020 - to date
New Projects

KC in the Cloud
- Removing Protocol Types
- One “Smart” Form
- New tracking capabilities for IRB Members and Research Teams
- Less manual processes for IRB staff

Website
- Complete overhaul of the website with new URL (name change)
- ADA compliance
- New forms
- User friendly

AAHRPP
- WVU IRB has been accredited since 2008
- Application for Reaccreditation due June 2020
- Preparation is currently underway
Staff Contact Information:

- **Gretchen McMasters**
  WVU OHRP Director

- **Rosemary Casteel**
  Continuous Improvement Manager

- **Sarah Stutler**
  Senior IRB Coordinator
  - Full Board, Research Related Events,
  - Notify IRBs, Protocol Builder, Prep to Research, Approval in Principle, Admin Reviews, HUDs, Emergency Use

- **Valerie Phillips**
  IRB Coordinator
  - Expedited, CIRB, IAAs, sIRB, Notify IRBs, QIPs

- **Lilo Ast**
  IRB Coordinator (Part Time)
  - Expedited, Exempt, Closures, QIPs

- **Joseph Malcolm**
  IRB Coordinator
  - NHSR/Flex, DUAs

- **Melissa Himes**
  IRB Coordinator
  - Tissue/Data Repositories, NHSR/Flex, Complaints

Office of Human Research Protections