



Completing a First-Rate Review:
Your Responsibilities as an

IRB Reviewer

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The IRB Mission

- To protect the rights and welfare of research participants



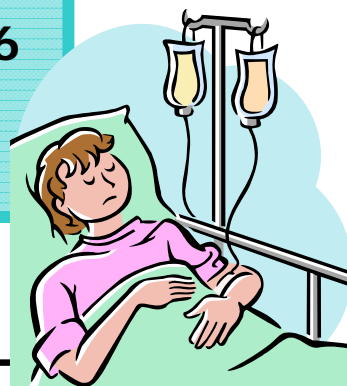
The IRB Mission

- The IRB is charged with the responsibility of reviewing and overseeing human subject research.
- The IRB review process is designed to protect the rights and welfare of human subjects by:
 - Ensuring equitable subject selection
 - Requiring adequate informed consent
 - Assessing and minimizing risks
 - Maintaining privacy and confidentiality

Title 45 Code of Federal Regulations, Part 46



45 CFR 46



Sub-Part A

"The Common Rule"

Sub-Part B

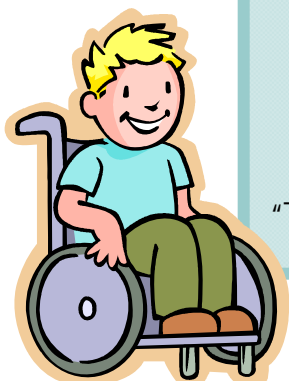
Additional protections
related to research
involving
fetuses/neonates
& pregnant women

Sub-Part C

Additional protections
related to research
involving prisoners

Sub-Part D

Additional protections
related to research
involving children





Criteria for Approval of Research

- Risks are minimized
- Risk-Benefit Ratio is reasonable
 - **Risk-Benefit Ratio:** *The comparison of the risk to its related benefits. "Benefit" includes direct benefit to participants, and anticipated benefit to society.*
- Selection of participants is equitable
- Informed consent is obtained as appropriate
- Consent is documented as required
- Data is monitored to ensure safety
- Participant privacy *and* confidentiality is protected
- Vulnerable populations are protected



Key Points to Consider

- **Risk:** Is the risk minimized?
- **Validity:** Will the study yield results that matter?
 - *This doesn't necessarily mean the results matter to the reviewer personally...*
- **Consent:** Is the consent process clear & easy to understand? Is it appropriate for the population being studied?



Minimizing Risk

(45 CFR 46.111)

- How do we ensure the risks to participants are minimized?
 1. The study must use procedures consistent with sound research design and which do not unnecessarily expose participants to risk.
 2. Whenever appropriate, the study must use procedures already being performed on the participants for diagnostic or treatment purposes.



Assessing Risk

- **Minimal Risk:**

- The probability and magnitude of harm and discomfort anticipated in research are not greater than those ordinarily encountered in daily life or during the performance of routine physical or psychological tests.

- **Greater than Minimal Risk**

Validity

- **True or False:**

“The job of the IRB is to evaluate ethics. It has no business commenting on the science of a research study.”



Validity

(45 CFR 46.111)



○ Answer: **False.**

○ In fact, the IRB is obligated to evaluate scientific quality if it is to function in compliance with ethical codes and Federal regulations.

○ If the study will yield no meaningful results, can we justify exposing participants to *any* level of risk?



Validity

(45 CFR 46.111)

Ethical science = Good science

○ **Declaration of Helsinki (2000):**

- Human research must conform to accepted scientific principles and be based on thorough knowledge of literature
- Should only be done if the importance of the objective outweighs risks and burdens to participants



Validity

When is it appropriate to require the study team to change the design of the study?

- If the reviewer knows a change to the design will meaningfully decrease the risk without compromising the study results, a change should at least be considered
 - If a low risk study design is flawed, but not fatally, there is no real ethical justification for the IRB to ask for mandatory revisions (e.g. student research).

Privacy and Confidentiality

○ *Similar, but not the same...*



○ **Privacy**

- Persons and their interest in controlling access to themselves

○ **Confidentiality**



- Ways that identifiable information will be stored and shared

Privacy and Confidentiality

- Both elements must be evaluated separately:



Privacy = People

“We will conduct the interviews in a closed office, and all exercise testing will be conducted in a private room.”



Confidentiality = Data about people

“We will keep research records on an encrypted, password-protected computer.”

Conducting a Review for the IRB: Reviewer's Monthly To Do List

- Pre-Board Preparation
- Minutes Check
- Assignments Once-Over
- Systematic Review
- Writing a Review Summary
- Requesting Revisions
- Presenting a Review



Conducting a Review for the IRB: Pre-Board Preparation

- Check your assignments immediately for conflicts
 - If you have a conflict of interest with a study you are assigned, contact your Coordinator immediately
- Review your studies as soon as you get them
- Get your questions answered before the meeting
- Consult with the IRB staff, the study team, and other members of the panel if you have concerns





Conducting a Review for the IRB: Minutes Check

- Read the minutes from the last meeting
 - Carefully look over the minutes from studies you reviewed, or discussions that had controverted issues
- Let the IRB Coordinator know before the meeting if there are errors in the minutes
- Mention at the beginning of the meeting that you suggested revisions to the minutes



Conducting a Review for the IRB: Assignments Once-Over

- Note the number of assignments you have and the position(s) of your assignments on the Agenda
- Primary or secondary reviewer?
- Consider expertise level needed for effective review
- Overwhelmed? Don't wait until it's too late! Notify your IRB Coordinator...
- Look over other agenda items that are from your department – can you offer anything to the discussion for those items?



Conducting a Review for the IRB: Systematic Review

- Read the Application first
- Skim the Consent Document
 - Tip: If there's an Assent or Parental Permission Document, read those first!
- Read the Protocol Summary
- Read the supporting documents
 - Company Protocol, recruitment materials, Investigator's Brochure, etc.
- Re-read the Consent Document carefully



Conducting a Review for the IRB: Writing a Review Summary

○ **Tips:**

- A review should take 2-3 minutes to present to the Board...
 - ...unless there are issues that require discussion, of course.
- Additional discussion may occur after the summary is presented.
- The reviewer should conclude their review by making a motion to the board (approve, changes, table, etc.)



Writing a Review Summary: New Study

- **Main Summary:**
 - Purpose, design, procedures
 - Significant risks
 - Recruitment
 - Consent Process & Documentation
 - Data Safety & Monitoring (if applicable)
 - Privacy & Confidentiality
 - Concerns
- **Additional Considerations:**
 - Vulnerable populations (children, cognitively-impaired individuals, etc.)
 - Waivers
 - Placebo



Writing a Review Summary: Continuing Review

- **Main Summary:**

- Purpose
- Enrollment status
- Events, problems, reports since last approval
- DSMB findings since last approval (if applicable)

- **Amendments:**

- Brief summary of proposed change(s)
- State whether or not the risk-benefit ratio has changed as a result
- State whether or not the change is appropriate and approvable



Writing a Review Summary: Amendment

○ **Main Summary:**

- Purpose of study
- Brief summary of proposed change(s)
- State whether or not the risk-benefit ratio has changed as a result
- State whether or not the change is appropriate and approvable

Writing a Review Summary: *Tips from the Pros...*

- “Draft your reviews in a Word Document, *then* insert them into ERICA when you’re done.”
- “Save your work often. Obsessively clicking that button may save your sanity.”





Conducting a Review for the IRB: Requesting Revisions

○ **Points to Consider:**

- Will the change I'm requesting be likely to improve the welfare of research participants to a meaningful degree?
- The difference between "Approved with Changes" and "Tabled" is how specific my revisions are.
- I have identified a problem with this study. Do I have a solution to suggest?



Conducting a Review for the IRB: Requesting Revisions

How do I write my revisions so the IRB Staff can write the post-board letter?

- Specify the document where change should be made
- Suggest specific text
- Familiarize yourself with your Coordinator's letter-writing style
 - How will the Coordinator interpret my requests? Did I leave room for interpretation?

Conducting a Review for the IRB: Requesting Revisions

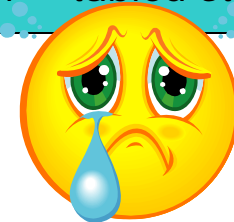
- *The consent document is a mess. They don't tell the patient how much blood they're taking, they just say that they're taking a lot. This needs to be changed.*

The study can still be approved with this change because the Board knows **exactly** what the Consent Document will say.



This revision = tabled study.

Or...



Consent Document, Study Procedures Section:
Please revise, "We will take a lot of your blood to run tests," to read, "We will draw up to four Tablespoons of blood for tests to see if the study drug is working."

Conducting a Review for the IRB: Requesting Revisions

Don't sweat the small stuff!

- Don't worry about correcting typos, formatting, etc. unless the errors are significant, persistent, or change the meaning of the document.



The Board Meeting

- A place to make decisions, not gather information
- Prepare, prepare, prepare!
 - Ask questions before the meeting
 - Discuss issues with the PI
 - Collegial interactions facilitate the review process and promote respect for the IRB
 - Decide if the PI should attend the meeting
 - Come with your revisions ready and in writing
- Keep your IRB Coordinator in the loop



Presenting a Review: New Study

○ Primary Reviewer:

- 2-3 minute summary of study
- Suggest **precise** changes
- Motion for a vote (pending the secondary reviewer's comments)

○ Secondary Reviewer:

- Focus on areas of disagreement with the primary reviewer
- Discuss the consent documents and process
- Suggest **precise** changes
- Motion for a vote



Know exactly what you are approving: Any significant changes **must** be approved by the Convened Board!



Presenting a Review: Continuing Review

- 1-2 minute summary of study
- Enrollment status
- Events, problems, reports since last approval
- DSMB findings since last approval (if applicable)
- Amendments (if applicable)



Presenting a Review: Amendment

- 1-2 minute summary of study
- Brief summary of proposed change(s)
- State whether or not the risk-benefit ratio has changed as a result
- State whether or not the change is appropriate and approvable

The Board Meeting: The Vote

- **Approved as submitted**
- **Approved with changes**
- **Tabled**



- IRB must clearly articulate what information it requires to re-consider the study
- The reviewer should plan on being present at the next board meeting to re-present the study and recommend another vote



- **Disapproved**
- **Abstain**

- Entered the room after the discussion but before the vote
- Insufficient information to make an informed decision
- Counts as a "No" in close votes



Conducting a Review for the IRB: Reviewer's Monthly To Do List

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- ✔ Assignments Once-Over
- ✔ Systematic Review
- ✔ Write a Review Summary
- ✔ Request Revisions
- ✔ Present the Review





Expedited Reviews

- **Expedited studies:**
 - Minimal risk
 - Research falls into one of the Expedited Categories
 - Research will not place participants at risk for civil liability or damage to their financial standing, employability, reputation, etc.
 - Research is not classified

Questions?



The IRB staff and your fellow board members are here to help you!

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