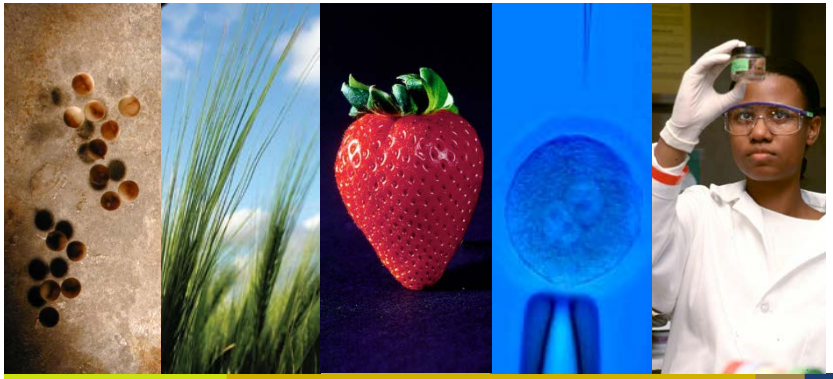


UC DAVIS OFFICE OF RESEARCH

AAHRPP Preparation
UC Davis Human Research
Part IV – Criteria for Review

Cindy Gates
IRB Administration

UCDAVIS
OFFICE OF RESEARCH

Tips for "Reviewer's Comments"

- Comments should be easily transferrable into the minutes and the formal letter of action;
- Comments should identify the issue and, if possible, suggest a corrective action;
- Comments should concentrate on the research and not include personal remarks about the sponsor or PI
- Comments should include a reference to the applicable criterion

Risks to subjects are minimized: (i) By using procedures which are consistent with sound research design and which do not unnecessarily expose subjects to risk, and (ii) whenever appropriate, by using procedures already being performed on the subjects for diagnostic or treatment purposes.

Risks to subjects are reasonable in relation to anticipated benefits, if any, to subjects, and the importance of the knowledge that may be expected to result. In evaluating risks and benefits, the IRB should consider only those risks and benefits that may result from the research (as distinguished from risks and benefits of therapies that subjects would receive even if not participating in the research). The IRB should not consider possible long-range effects of applying knowledge gained in the research (for example, the possible effects of the research on public policy) as among those research risks that fall within the purview of its responsibility.

Questions to ask

Is there any chance participants will suffer pain or injury if they enroll?

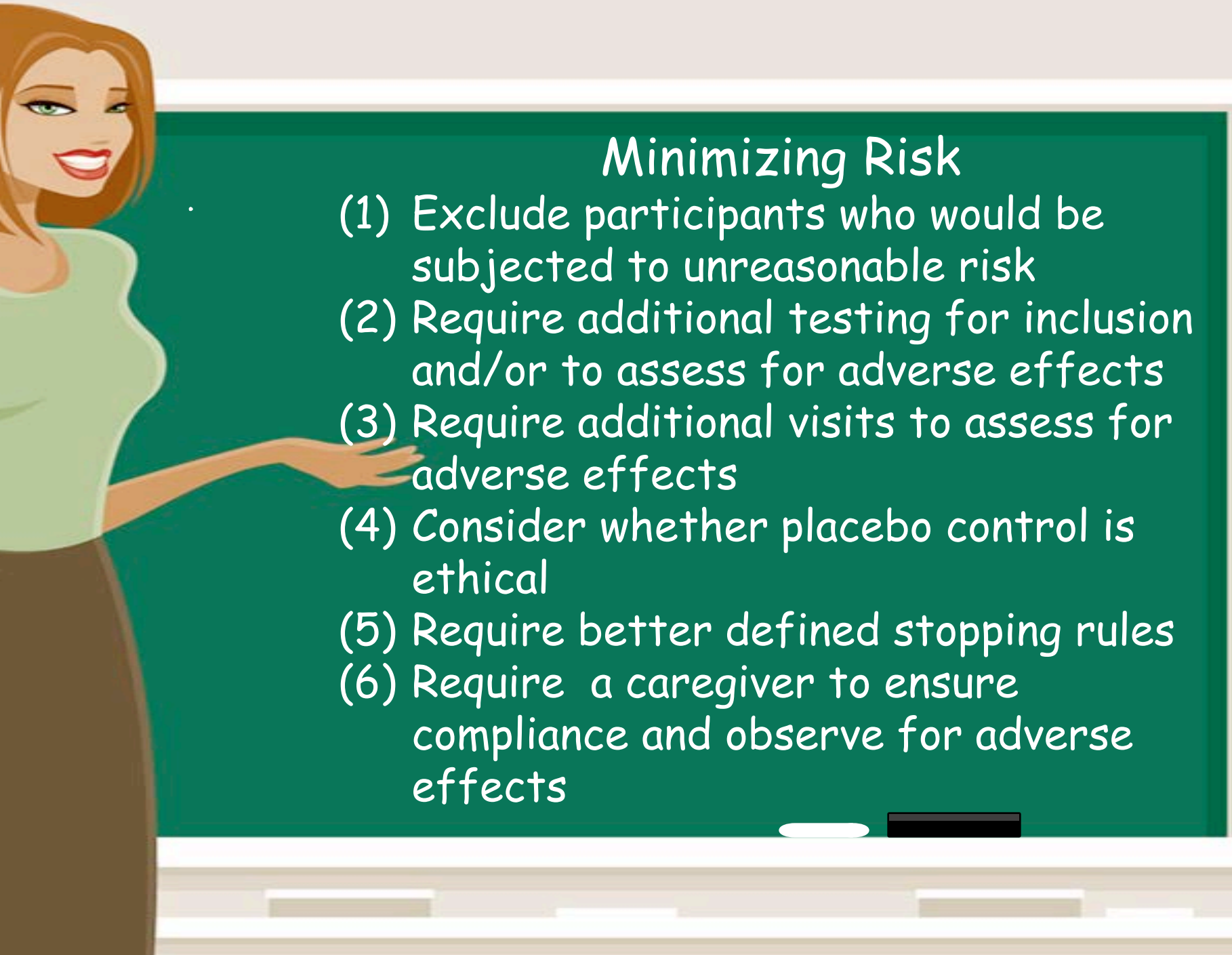
Could participants face a financial impact if they enroll?

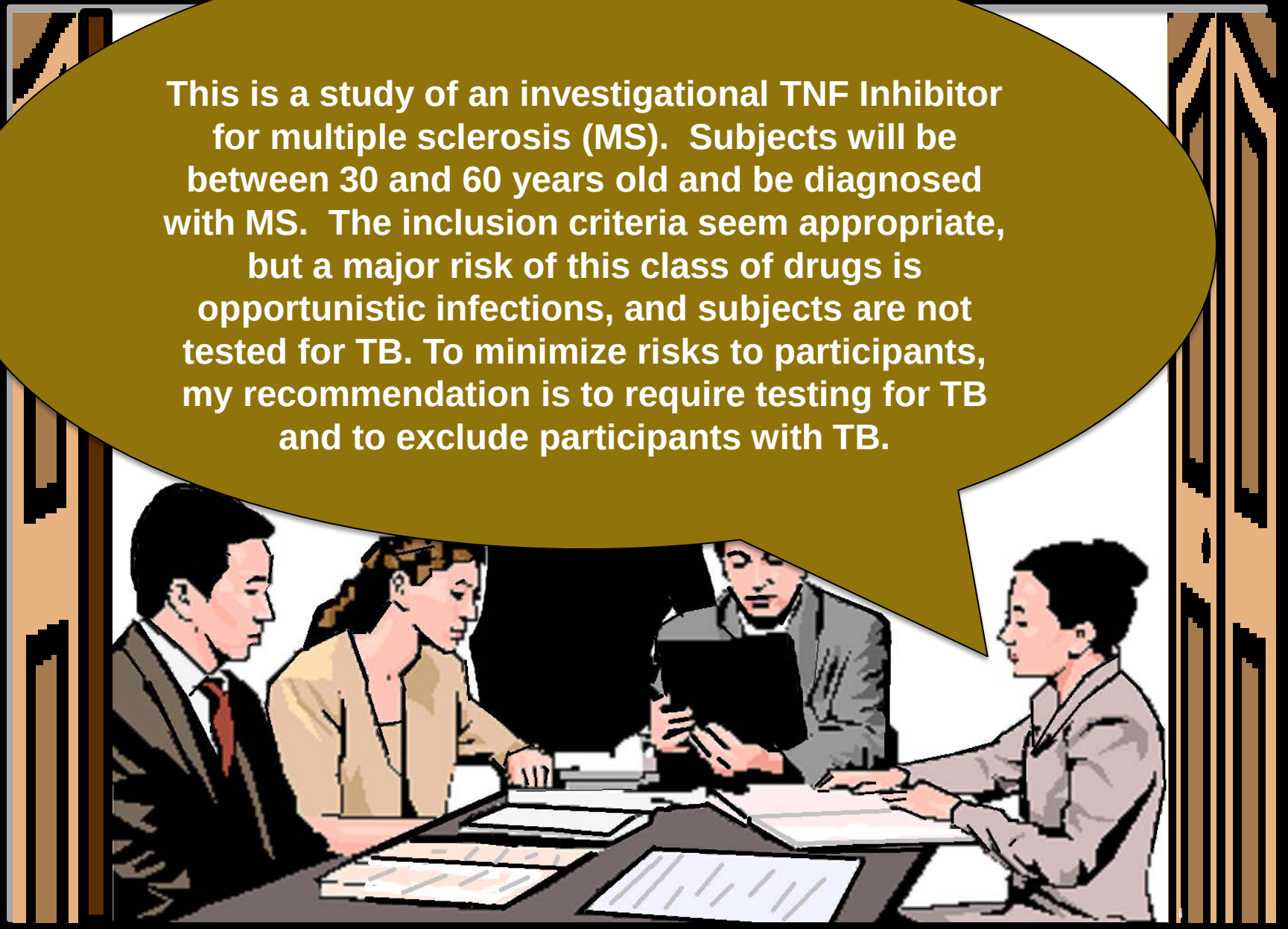
Could participation result in psychological or emotional harm?

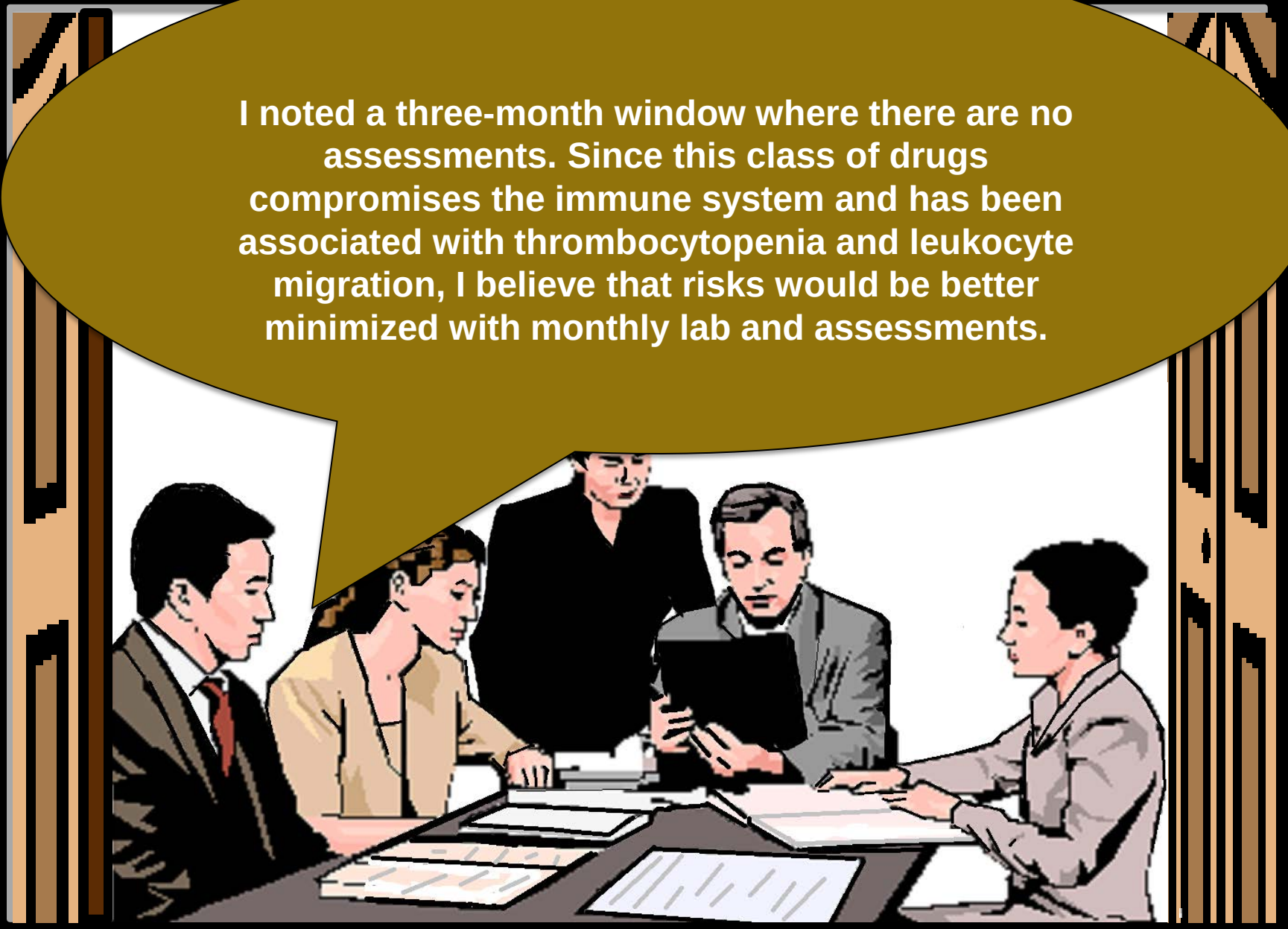
Is there any risk to the participant's privacy?

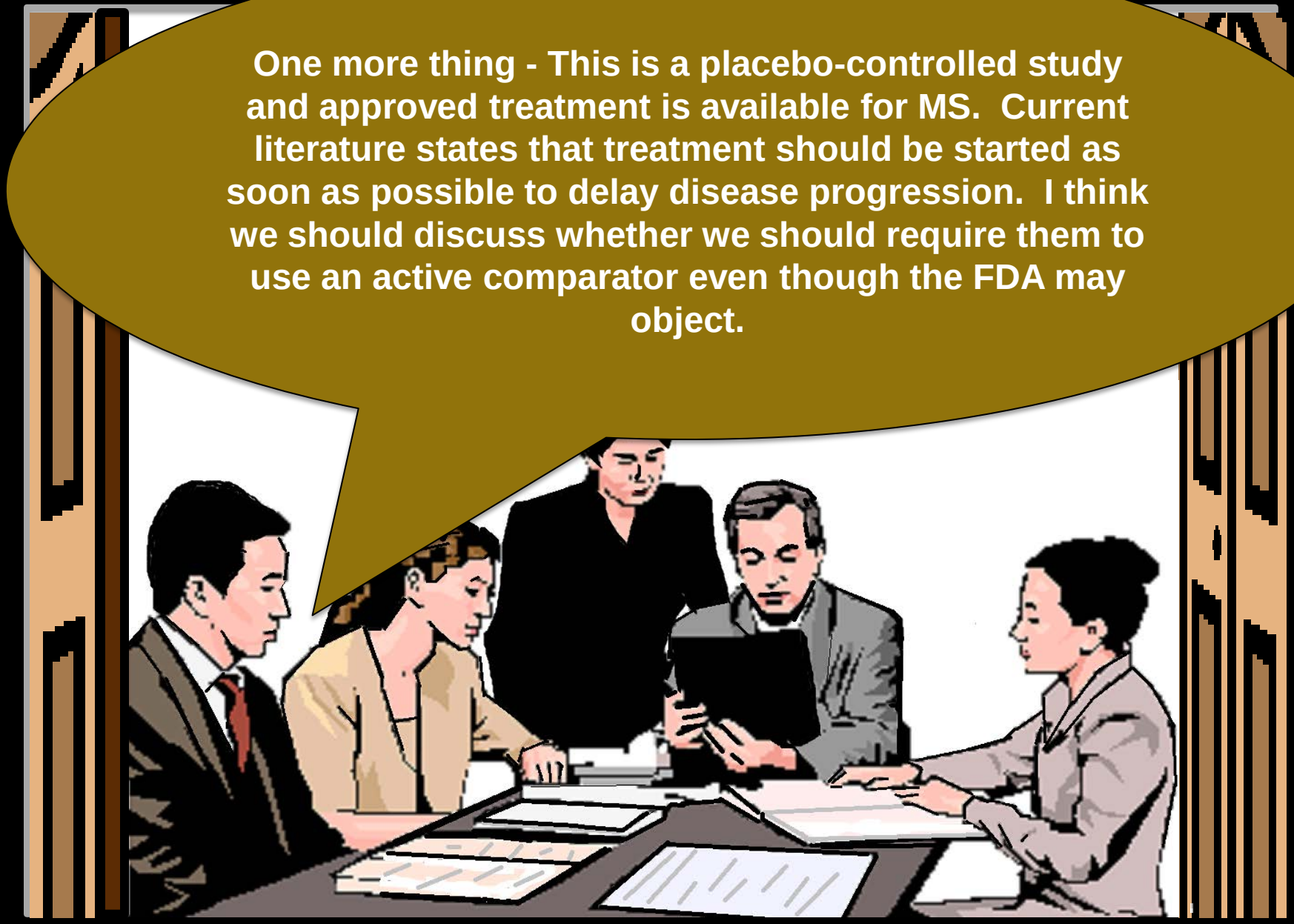
Could participation result in damage to the individual's reputation?

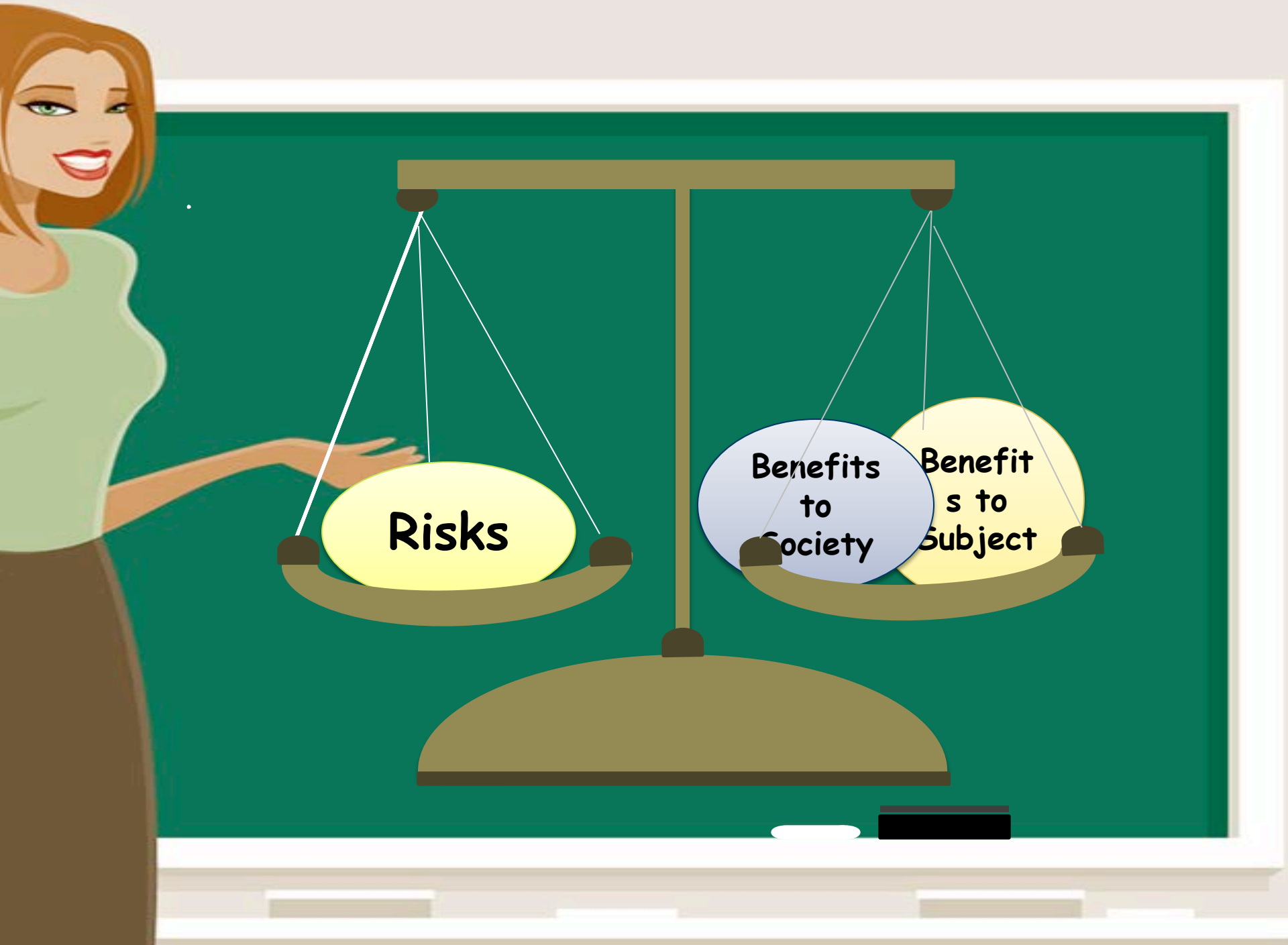
Are there any legal risks?

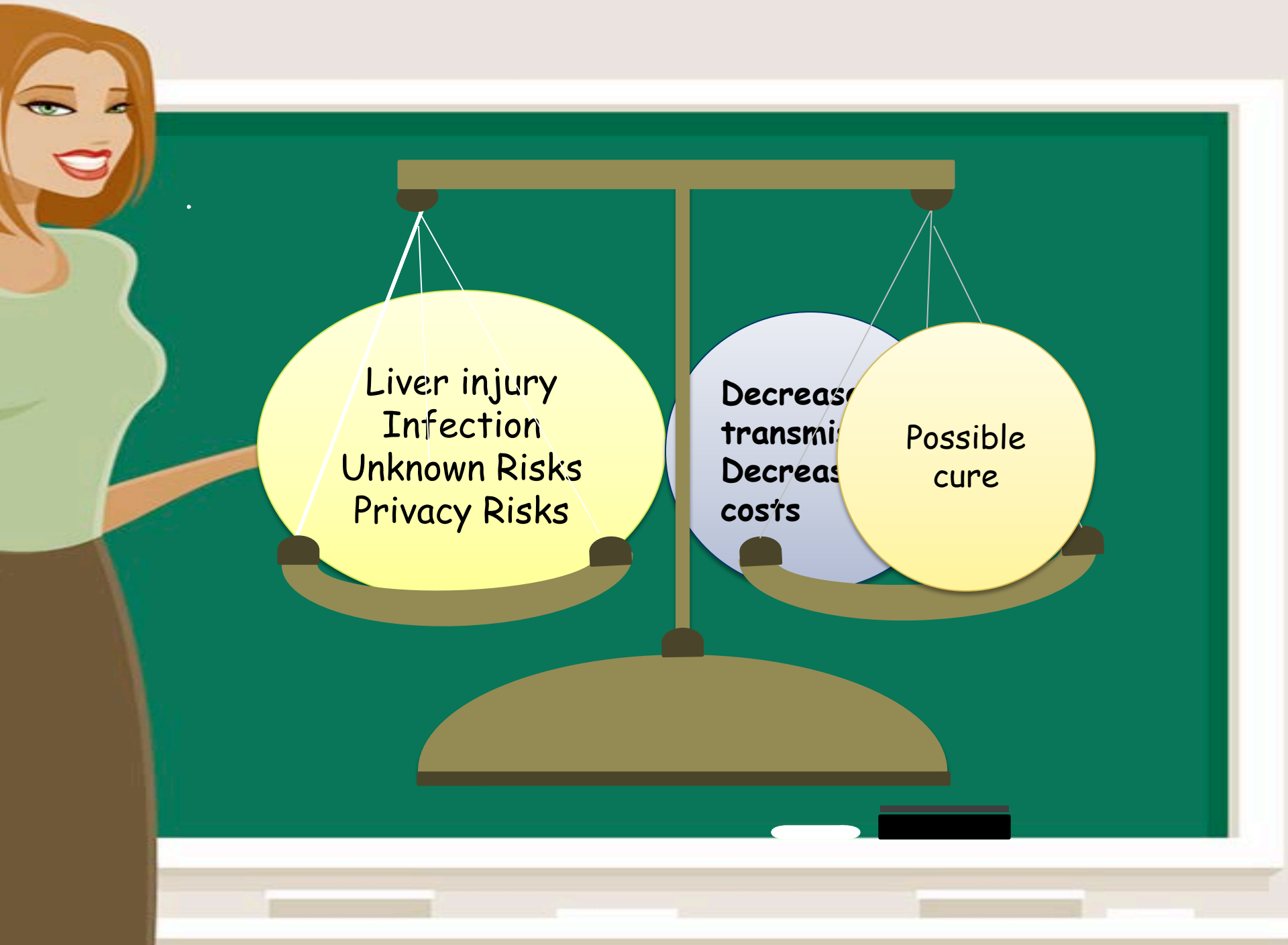

Minimizing Risk
(1) Exclude participants who would be subjected to unreasonable risk
(2) Require additional testing for inclusion and/or to assess for adverse effects
(3) Require additional visits to assess for adverse effects
(4) Consider whether placebo control is ethical
(5) Require better defined stopping rules
(6) Require a caregiver to ensure compliance and observe for adverse effects


This is a study of an investigational TNF Inhibitor for multiple sclerosis (MS). Subjects will be between 30 and 60 years old and be diagnosed with MS. The inclusion criteria seem appropriate, but a major risk of this class of drugs is opportunistic infections, and subjects are not tested for TB. To minimize risks to participants, my recommendation is to require testing for TB and to exclude participants with TB.


I noted a three-month window where there are no assessments. Since this class of drugs compromises the immune system and has been associated with thrombocytopenia and leukocyte migration, I believe that risks would be better minimized with monthly lab and assessments.

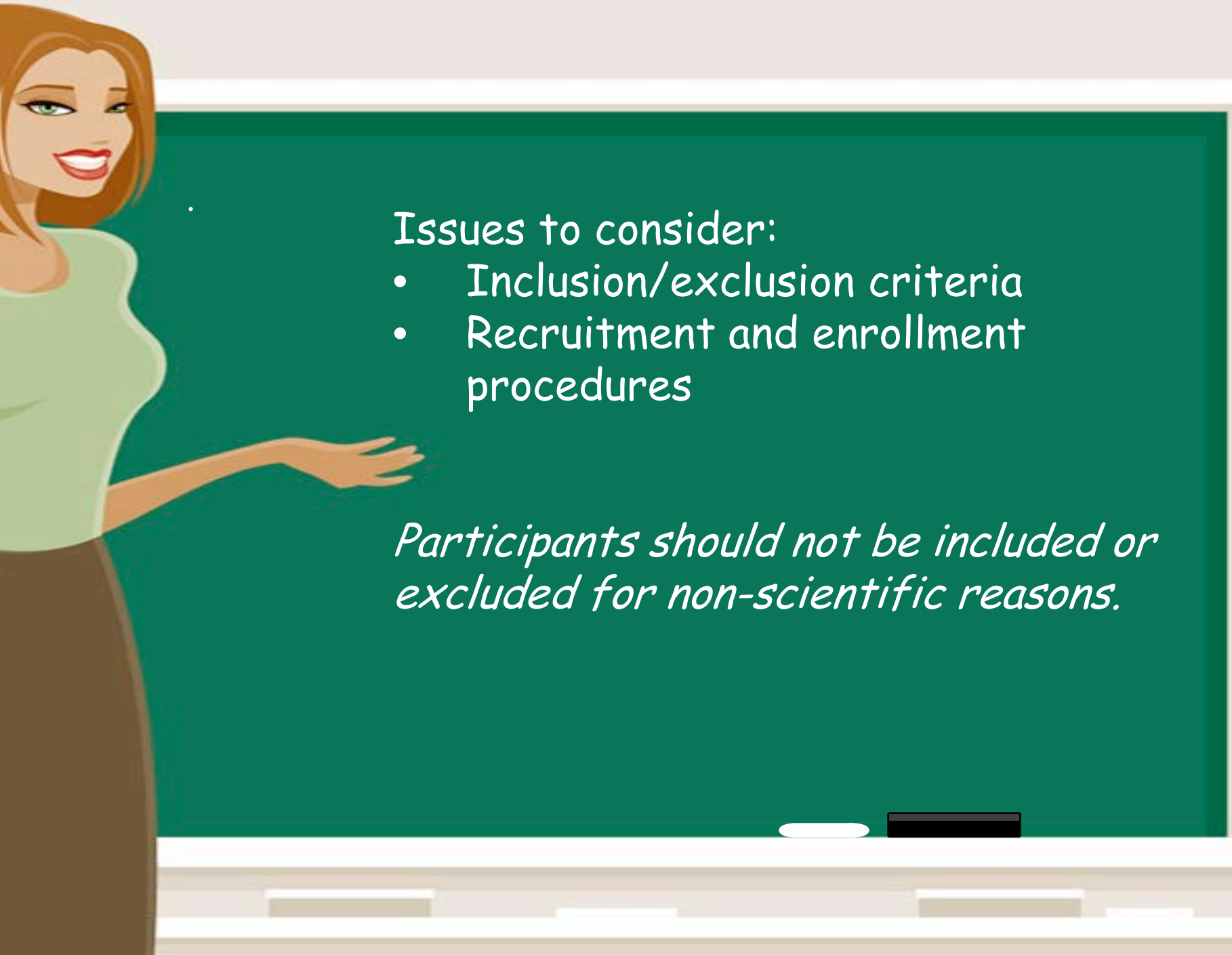

One more thing - This is a placebo-controlled study and approved treatment is available for MS. Current literature states that treatment should be started as soon as possible to delay disease progression. I think we should discuss whether we should require them to use an active comparator even though the FDA may object.

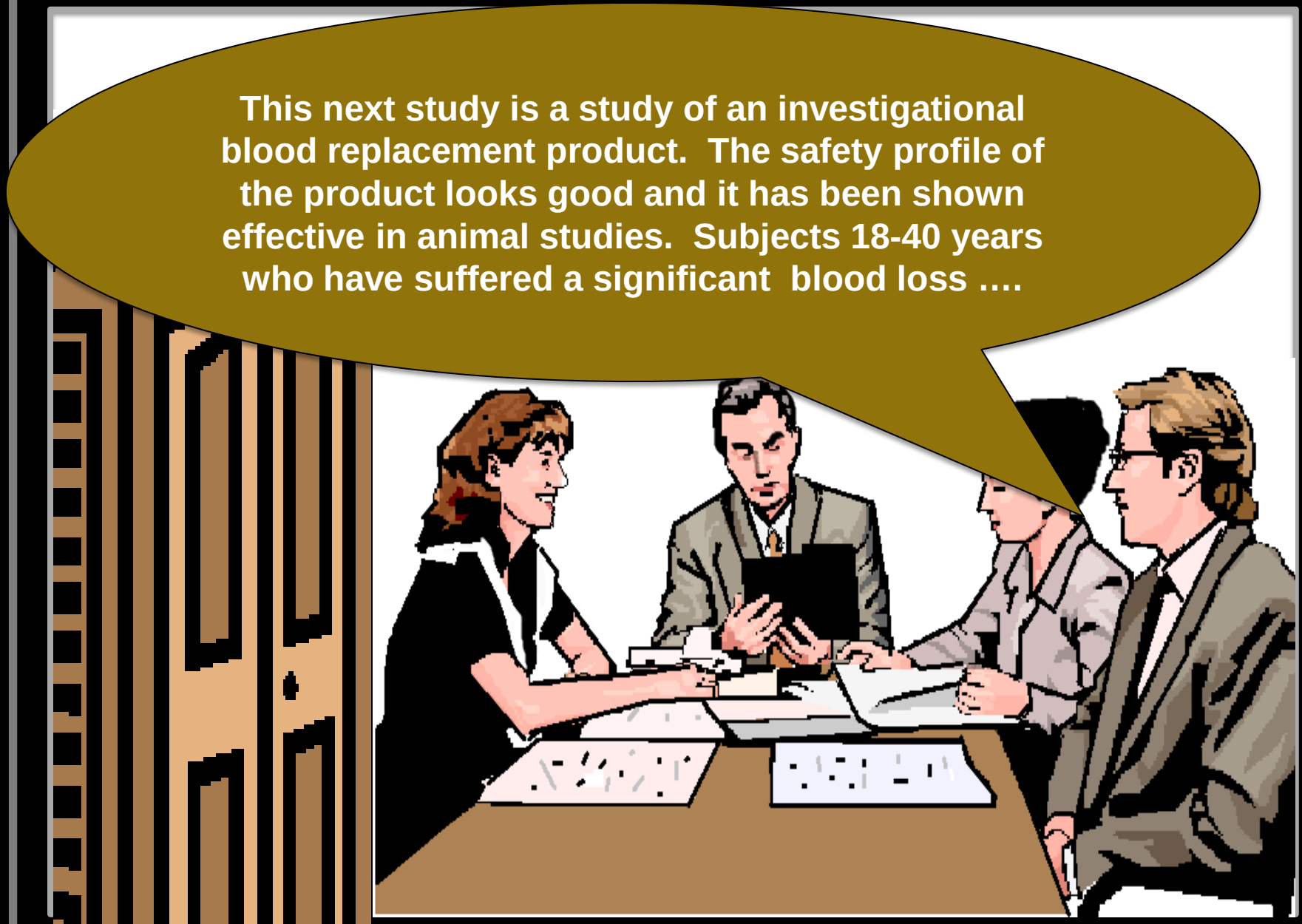

Risks
Benefits to Society
Benefits to Subject

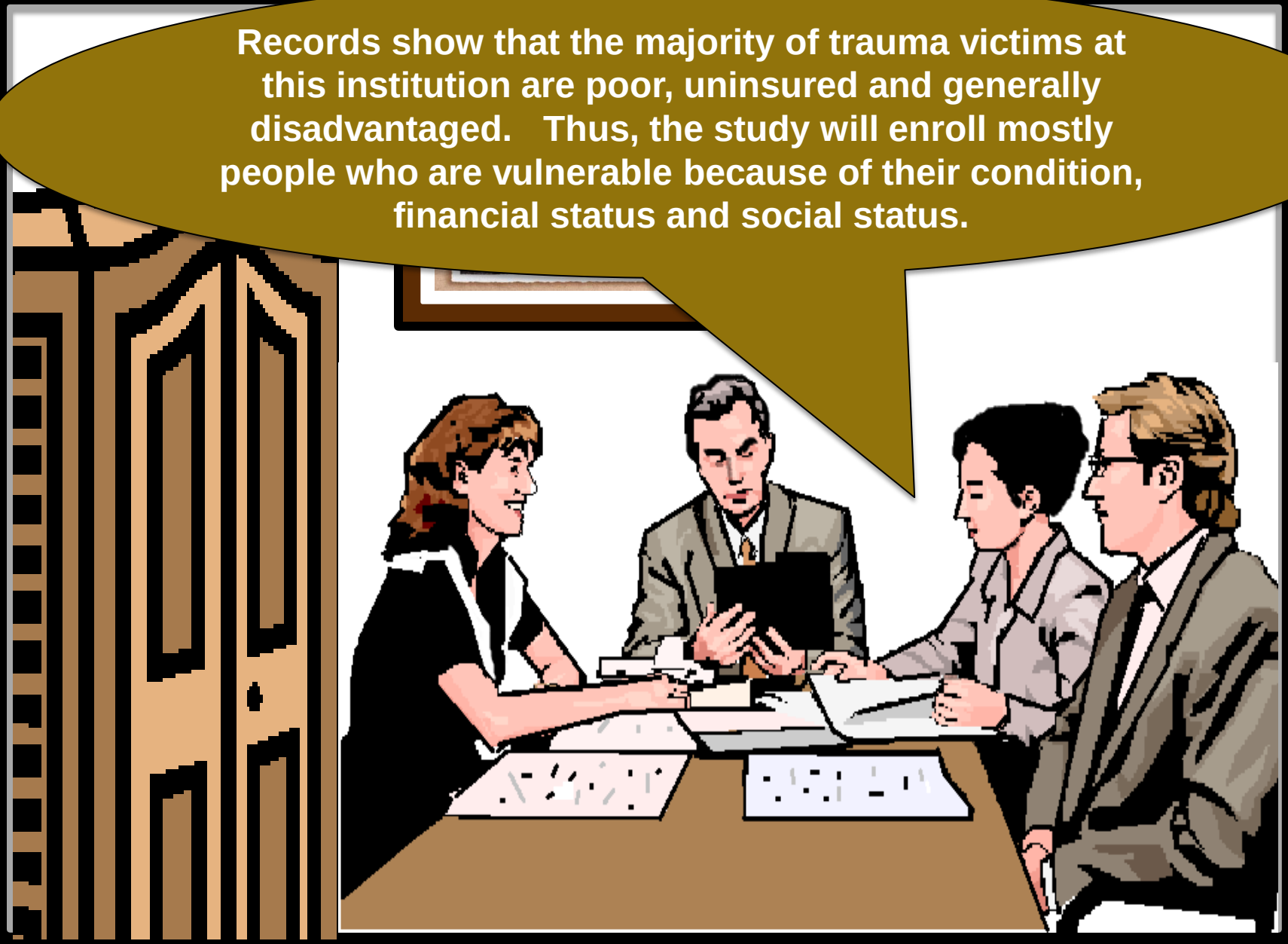

Liver injury
Infection
Unknown Risks
Privacy Risks
Decreas
transmi
Decreas
costs
Possible
cure

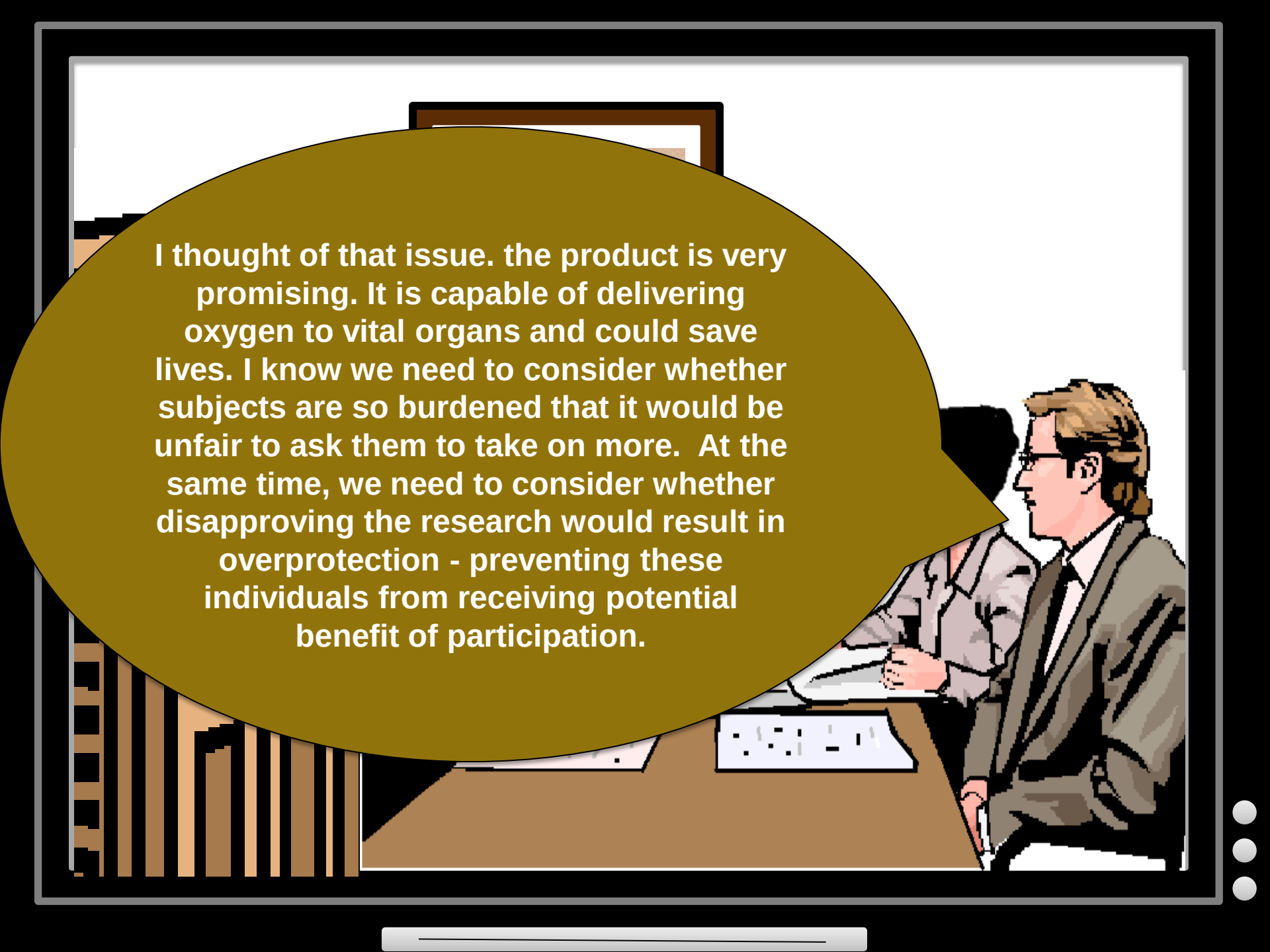
Potential Risks	Potential Benefits to Society	Potential Benefit to Participants
Liver injury Anaphylaxis Infection Unknown Risks Privacy Risks	If safe and effective, test article may reduce incidence of transmission of a disease	If safe and effective, test article may cure the individual

Selection of subjects is equitable. In making this assessment the IRB should take into account the purposes of the research and the setting in which the research will be conducted and should be particularly cognizant of the special problems of research involving vulnerable populations, such as children, prisoners, pregnant women, handicapped, or mentally disabled persons, or economically or educationally disadvantaged persons.

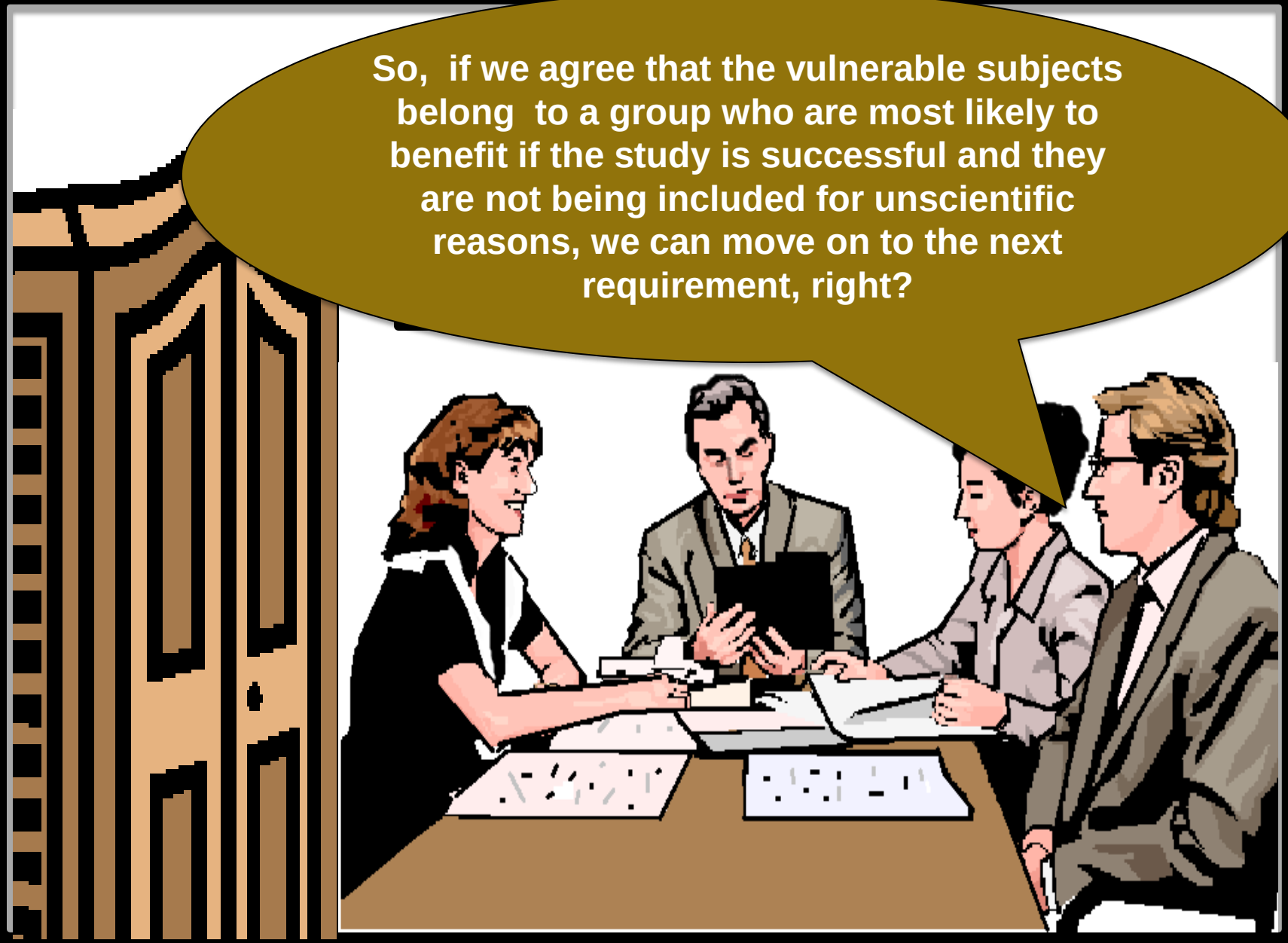

Issues to consider:
• Inclusion/exclusion criteria
• Recruitment and enrollment procedures
Participants should not be included or excluded for non-scientific reasons.


This next study is a study of an investigational blood replacement product. The safety profile of the product looks good and it has been shown effective in animal studies. Subjects 18-40 years who have suffered a significant blood loss ….


Records show that the majority of trauma victims at this institution are poor, uninsured and generally disadvantaged. Thus, the study will enroll mostly people who are vulnerable because of their condition, financial status and social status.


I thought of that issue. the product is very promising. It is capable of delivering oxygen to vital organs and could save lives. I know we need to consider whether subjects are so burdened that it would be unfair to ask them to take on more. At the same time, we need to consider whether disapproving the research would result in overprotection - preventing these individuals from receiving potential benefit of participation.


The sponsor need to conduct the study at a regional trauma centers, which we are. So the vulnerable subjects are not being selected for non-scientific reasons. Besides, these vulnerable subjects are the most likely to benefit if the product is effective.

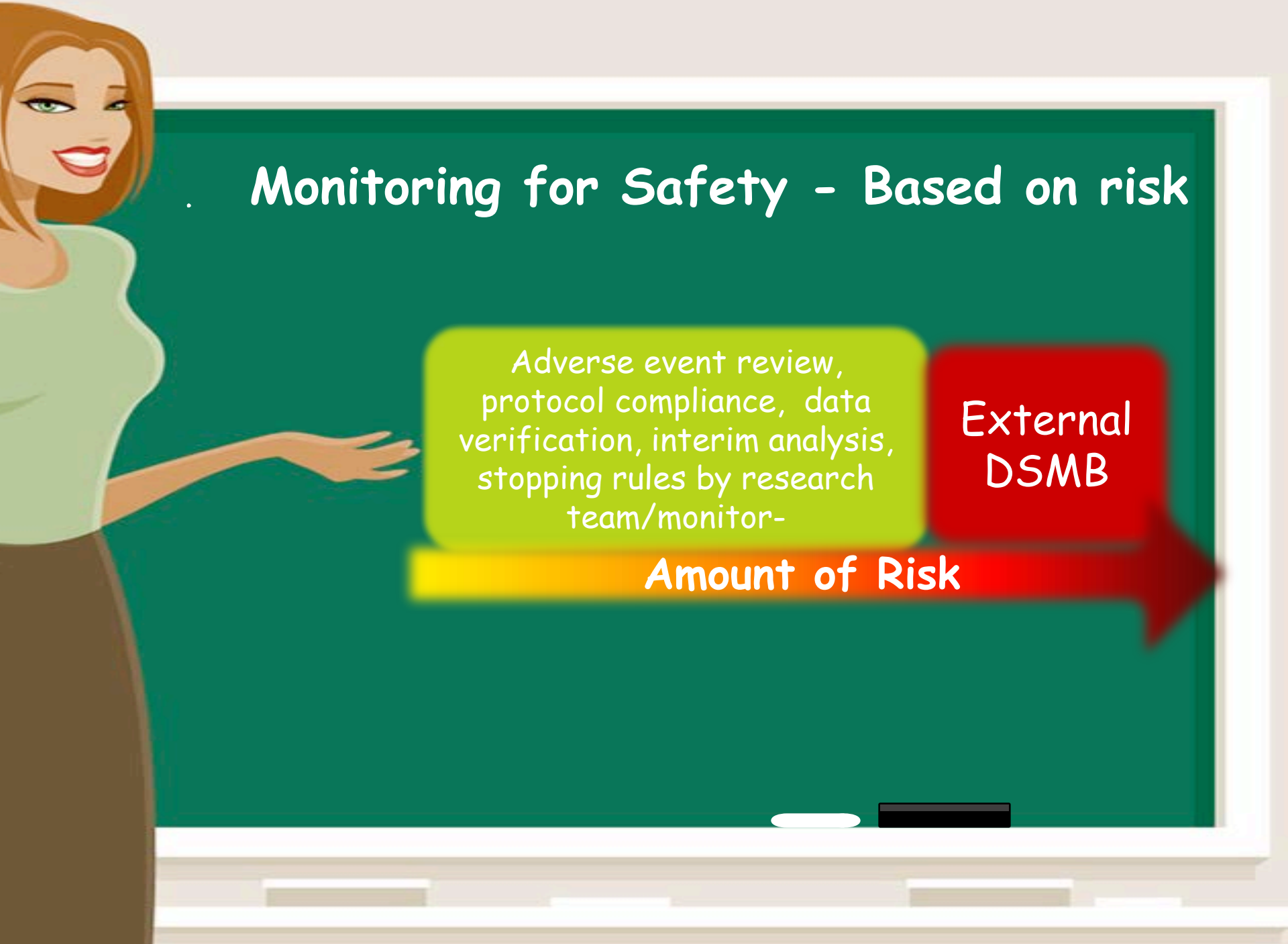

So, if we agree that the vulnerable subjects belong to a group who are most likely to benefit if the study is successful and they are not being included for unscientific reasons, we can move on to the next requirement, right?

Informed consent will be sought from each prospective subject or the subject's legally authorized representative, in accordance with and to the extent required by (the regulations)

Informed consent will be appropriately documented, in accordance with and to the extent required by (the regulations)..

Where appropriate, the research plan makes adequate provision for monitoring the data collected to ensure the safety of subjects.

adverse event reporting and monitoring, data verification, interim analyses and stopping points, or protocol compliance monitoring



Where appropriate, there are adequate provisions to protect the privacy of subjects and to maintain the confidentiality of data.

Privacy:

- Time and place where participants provide information
- Individuals who obtain information from participants
- Nature of the information participants provide
- Types of experience participants will participate in

Confidentiality:

- Is access to research data protected
- Are plans to secure data adequate
- Is a certificate of confidentiality needed for sensitive information?

When some or all of the subjects, such as children, prisoners, pregnant women, handicapped, or mentally disabled persons, or economically or educationally disadvantaged persons, are likely to be vulnerable to coercion or undue influence additional safeguards have been included in the study to protect the rights and welfare of these subjects.

Coercion - Individuals believe they may suffer harm if they do not agree

Undue Influence - Individuals believe they may be rewarded if they agree

Example of Coercion

Recruitment or consent processes or done by a person with authority over the prospective participant – and participant believes (correctly or incorrectly) that she will suffer adverse consequences if he/she refused to enroll.

Examples of Undue Influence

- Recruitment or consent process includes information that promises benefits that could unduly influence individual
- Recruitment incentive is such that individual might not consider the risks of the research
- Compensation is conditioned on participant completing all or part of the study


This is an ad and compensation plan for a study of an investigational drug for depression we approved last month. The expedited reviewer referred it to us because the reviewer believes it is unduly influential. He recommends disapproval of the advertisement and compensation plan.

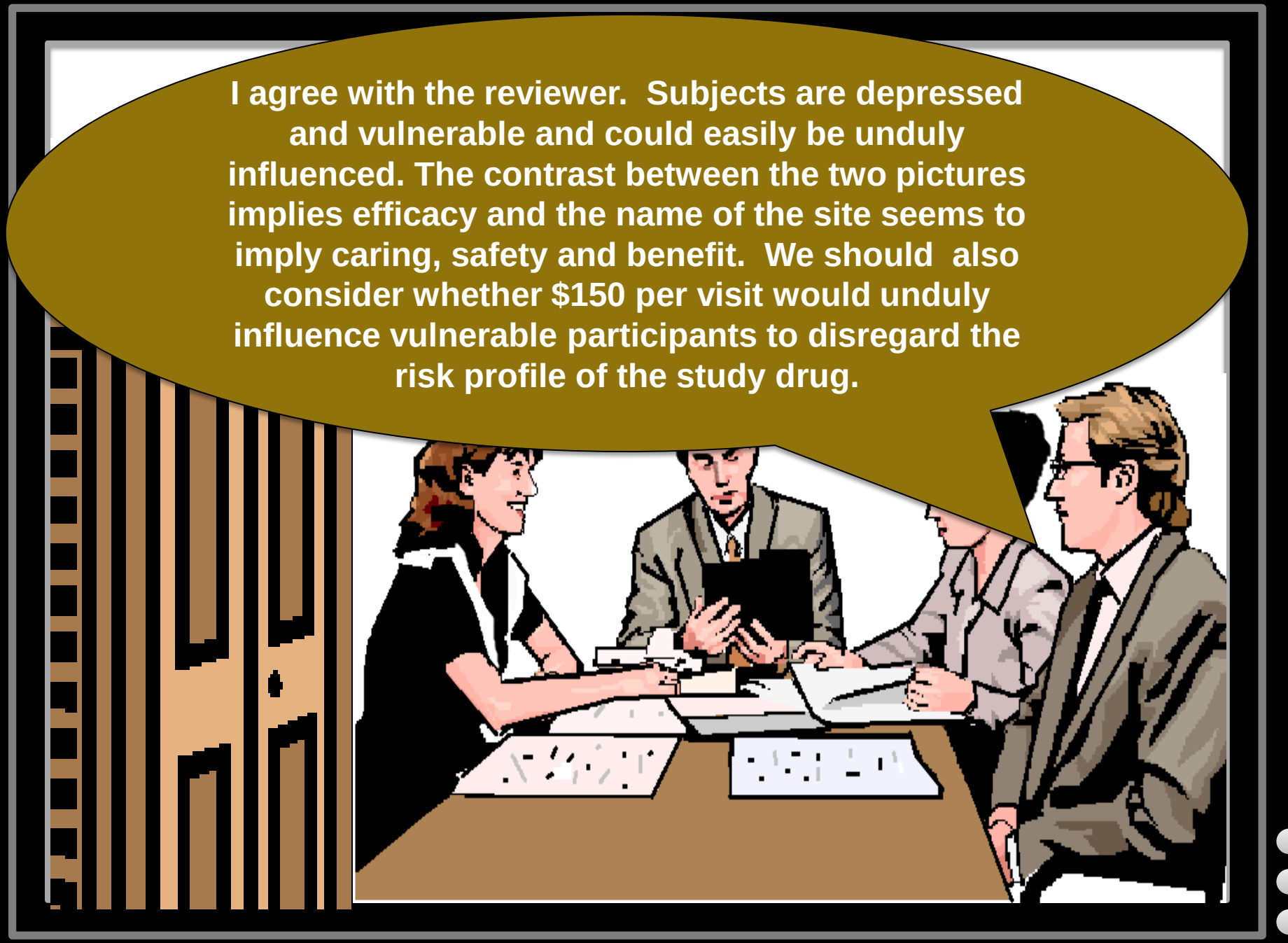

I agree with the reviewer. This study will enroll severely depressed individuals who will be paid $150 for each study visit. Let's look at the advertisement.

Join the Fight Against Depression

Come to the WeCareClinic to participate in a research study on an investigational treatment for severe depression. See if this new drug will relieve your symptoms and help you lead a normal, happy life.

All treatment is free and you can earn $150 for each completed study visit.

Call Today!
1.800.WeCare2
You will be glad you called


I agree with the reviewer. Subjects are depressed and vulnerable and could easily be unduly influenced. The contrast between the two pictures implies efficacy and the name of the site seems to imply caring, safety and benefit. We should also consider whether $150 per visit would unduly influence vulnerable participants to disregard the risk profile of the study drug.


I also agree and make a motion to disapprove the advertisement.

Thank you!